**REPUBLIC OF ALBANIA**
**MINISTRY OF DEFENSE**

# INTEGRITY PLAN OF THE MINISTRY OF DEFENSE

# 2022-2025

April 2022

## ACTION PLAN

### 1. Area of policies and mechanismsof democratic oversight

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* "

| RISK | THE MEASURE TO BE TAKEN | RESPONSIBLE UNIT | DEADLINE | EVENTS | SOURCES |
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| 1. Lack of a specific anti-corruption policy for the defense sector, except for the obligations deriving from the cross-sectoral anti-corruption strategy and the drafting of an integrity plan in the process. | Inclusion in the policy documents of the MoD of a guiding framework for anti-corruption activity in the defense sector. | General Directorate of Defense Policy | January 2023 | Inclusion of information in the Defense Directive. | General Directorate of Defense Policy |
| 2. Carrying out the integrity / corruption risk reassessment in the MoD. | Corruption risk assessment and drafting of the MoD Integrity Plan  Coordination and monitoring of the corruption risk assessment process, and measures to | Directorate of Defense Policy  Working group for drafting the Integrity Plan in the MoD and the Armed Forces | December 2023 | Setting up a working group in the MoD.  Setting up a working group in the Armed Forces.  Training of working groups.  Risk identification and | Working groups for drafting the integrity plan in the MoD and the Armed Forces of the Republic of Albania with the support of CIDS |

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| | address them in the subordinate structures of the MoDand the Armed Forces | | | assessment. Drafting the Integrity Plan | |
| 3. Lack of conducting integrity / corruption risk assessment in the GS. | Corruption risk assessment and drafting of the Integrity Plan of the GS Coordination and monitoring of the corruption risk assessment process, and measures to address them in the subordinate structures of the Armed Forces. | Working group for drafting the Integrity Plan in GS | December 2022 | Establishment of the working group in GS of AF. Training of working groups. Risk identification and assessment. Drafting an Integrity Plan. | Working group for drafting the Integrity Plan at GS with the support of CIDS |
| 4. Lack of harmonization of strategic documents in the defense sector. | Drafting an internal document on the planning process in the MoD and the Armed Forces. | General Directorate of Defense Policy | June 2023 | Establishment of the working group Drafting the material in collaboration with experts. | Working Group with CIDS Support |
| 5. The consultation process in drafting and approving defense policies tends to be very short and not | Drafting a framework document for the process of engagement with stakeholders and the public during the | General Directorate of Regulatory and Compliance in the | April 2023 | Drafting the periodic report on the involvement of stakeholders in drafting | MoD staff with CIDS support |

| comprehensive. | drafting of defense policy documents. | Field of Defense<br><br>General Directorate of Defense Policy<br><br>Work group | | policy documents.<br><br>Publication and discussion of reports. | |
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| 6. Lack of an engagement program with NGOs, especially in terms of anti-corruption. | Drafting and publishing an engagement program with NGOs, which contains scope and modalities of cooperation. | General Directorate of Regulatory and Compliance in the Field of Defense<br><br>General Directorate of Defense Policy<br><br>Work group | December 2022 | Drafting an annual program for NGO engagement.<br><br>Organizing meetings with NGOs. | Working Group with CIDS Support |
| 7. Lack of needs assessment for drafting an integrity plan in the subordinate structures of the MoD | Integrity risk assessment in subordinate structures. | General Directorate of Defense Policy<br><br>Subordinate structures MoD and GS | March 2023 | Identify the subordinate structures of the MoD and the GS which meet the criteria to have an integrity plan. | General Directorate of Defense Policy in cooperation with CIDS<br><br>Subordinate structures MoD and GS |

## 2. Field of human resource management

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

| RISK | THE MEASURE TO BE TAKEN | RESPONSIBLE UNIT | DEAD LINE | EVENTS | SOURCES |
|---|---|---|---|---|---|
| 1. Lack of standard operating procedures. | Drafting and approval of standard operating procedures for each work process in the MoD. | Directorate of Good Administration of Human Resources and Services<br><br>Relevant directorates | December 2023 | Review of existing procedures.<br><br>Draft standard operating procedures for missing units. | MoD staff with CIDS support |
| 2. Lack of information regarding privacy policies. | Cycle of training for all staff of the Ministry regarding privacy policies. | Directorate of Good Administration of Human Resources and Services<br><br>Other directorates | December 2022 | Inclusion of training on privacy policies in the annual training calendar of the MoD.<br><br>Organizing trainings on privacy policies. | MoD staff<br><br>KDIMDP |
| 3. Lack of training needs assessment to be performed by the human resources unit. | Development of Training Needs (TN) methodology.<br><br>Compilation of the electronic questionnaire | Directorate of Good Administration of Human Resources and Services | December 2023 | Drafting the methodology for TN.<br><br>The human resources unit conducts a training needs assessment for | Directorate of Human Resources and Services Administration with the support of CIDS |

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| for Training Needs. | | | | MoD staff once a year . | |
| 4. Lack of an annual training plan which stems from the training needs assessment. | Drafting the annual training plan. | Directorate of Good Administration of Human Resources and Services | December 2023 | The human resources unit finalizes the annual training plan. | Directorate of Good Administration of Human Resources and Services |
| 5. Lack of training for all staff of the Ministry regarding conflict of interest. | Participation of all MoD staff in trainings on conflict of interest. | Directorate of Good Administration of Human Resources and Services Other Directorates | December 2023 | Include conflict of interest training in the annual training plan. Organizing trainings on conflict of interest. | MoD staff and Cabinet of the Minister with the support of CIDS and ASPA |
| 6. Lack of a gift register, confidentiality statement, dual employment statement. | Review of internal regulations. Drafting the gift code which will include the gift register, as well as the statement for receiving a gift. Drafting the standard declaration of confidentiality and dual | Directorate of Good Administration of Human Resources and Services Other directorates | June 2022 | Approval of internal regulations. Drafting the gift register. Drafting a statement on confidentiality and dual employment. | Directorate of Human Resources and Services Administration with the support of CIDS |

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| | employment. | | | | |
| 7. Duties arising from such laws as the law on the right to information, the law on personal data protection, the law on conflict of interest are not provided in the job description of the employees performing these duties. | Inclusion, in job descriptions, of duties arising from other laws . | Directorate of Good Administration of Human Resources and Services Respective directorates | June 2023 | Review job descriptions and reflect on tasks arising from other laws. | Directorate of Human Resources and Services Administration with the support of CIDS |
| 8. Change of coordinator for the right to information, lack of training on information classified as "state secret". | Designing a dedicated training program for information classified as "state secret" Draft a standard action procedure regarding the handling of classified information cases. | Directorate of Good Administration Human Resources and Services MoDstaff | December 2023 | Standard operating procedure for classified information. Organizing trainings on the right to information and classified information. | MoD staff and Cabinet of the Minister with the support of CIDS AISM GS CISD |
| 9. Lack of training for the process of public notification and consultation. | Development of a training curriculum and training of staff of directorates that draft laws and bylaws related to the public consultation process. | Directorate of Good Administration of Human Resources and Services Coordinator for public | April 2023 | Ongoing training of the notification and public consultation coordinator. | Coordinator for public notification and consultation with the support of CIDS |

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| | | notification and consultation. | | | |
| 10. Lack of regular anti-corruption and integrity training for all staff. | Include anti-corruption and integrity training in the annual training plan. | Directorate of Good Administration of Human Resources and Services | June 2023 | Design an anti-corruption / integrity training curriculum. | MoD staff, Cabinet of the Minister, GS with the support of CIDS |

### 3. Area of internal audit and control.

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 the MoD staff"

| RISK | THE MEASURE TO BE TAKEN | RESPONSIBLE UNIT | DEADLINE | EVENTS | SOURCES |
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| 1. Lack of publication of internal and external audit reports. | Publication of audit reports and monitoring of the website. | Audit Directorate<br><br>Web Sector | December 2022 | Publication of external audit reports and annual internal audit report in the transparency program (in accordance with the law on personal data protection). | Audit Directorate |
| 2. Lack of training on the performance audit process for the staff of the Internal Audit Directorate. | Include performance audit training in the annual training plan. | Audit Directorate | December 2023 | Organizing and participating in specific trainings related to performance audits. | Audit Directorate<br><br>Directorate of Good AdministrationHuman Resources and Services |
| 3. The anti-corruption contact point is not designated. | Sending the official letter to the KKK, regarding the appointment of the anti-corruption contact point. | Secretary General | June 2022 | Designation of anti-corruption contact point. | Secretary General |

## 4. Area of financial management and public procurement.

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

| RISK | THE MEASURE TO BE TAKEN | RESPONSIBLE UNIT | DEADLINE | EVENTS | SOURCES |
|---|---|---|---|---|---|
| 1. Lack of training for the risk coordinator. | Participation in risk coordinator trainings. | Risk coordinator | April 2023 | Risk coordinator training. | Risk coordinator<br><br>Directorate of Good Administration of Human Resources and Services |
| 2. Frequent change of personnel covering finances in military structures. | Coordination of DMBNJSH of MoD and GS for setting quotas for financial staff. | Directorate of Good Administration of Human Resources and Services | December 2023 | Setting quotas by the Directorate of Good Administration of Human Resources and Services, in cooperation with SHFA for financial staff. | Directorate of Good Administration of Human Resources and Services GS |
| 3. Lack of special rules for staff in sensitive sectors, where frequent rotation is needed (procurement). | Inclusion of rules for staff rotation in the internal regulations of the institution. | Directorate of Good Administration of Human Resources and Services | December 2023 | Drafting special rules for staff rotation during risky procedures such as public procurement, etc. | Directorate of Good Administration Human Resources and Services with the support of CIDS (depending on the process initiated by PPA) |
| 4. Lack of transparency for | Update the transparency | Directorate of Procurement and | December | Publication in the transparency program of | Directorate of Procurement and |

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| all documentation drafted for the public procurement process. | program. | Auctions<br><br>Web Sector | 2022 | the register of estimates and the register of public procurements. | Auctions<br><br>IT sector |
| 5. Contracts concluded by the Ministry of Defense are not public. | Update the transparency program. | Directorate of Procurement and Auctions<br><br>Web Sector | December 2022 | Publication in the transparency program of contracts concluded with different operators, as well as publication of donations (if any). | Directorate of Procurement and Auctions<br><br>IT sector |

**5. Field of international missions and operations.**

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 .*"

| RISK | THE MEASURE TO BE TAKEN | RESPONSIBLE UNIT | DEADLINE | EVENTS | SOURCES |
|---|---|---|---|---|---|
| 1. The Military Doctrine of the Armed Forces does not analyze how the Armed Forces plan to handle and address risks of integrity and corruption in operations. | Drafting a comprehensive document which addresses corruption risks in operations in country as well as in peacekeeping operations and missions at the strategic, operational and tactical levels. | General Directorate of Defense Policy | June 2023 | Document drafted to address corruption risks in operations. | GS and the General Directorate of Defense Policy with the support of CIDS |
| 2. Lack of guidance on accelerated procurement during operations or missions. | Drafting a regulation on procurement in international missions and operations. | GS<br><br>Directorate of Programming, Standardization and Harmonization of Regulatory Acts<br><br>Directorate of Procurement and | June 2023 | Establishment of a working group for drafting the regulation.<br><br>Setting deadlines for finalizing the regulation. | MoD and GS staff with CIDS support |

| | | Auctions | | | |
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| 3. The MoD is the controlling institution of the executive, while the Oversight Assembly, but because such reports are not produced, the oversight mechanisms are not activated. | Inclusion in policy documents the general regulatoryfor reporting and accountability for the implementation of integrity policy in operations . | General Directorate of Defense Policy | April 2023 | The policy document is reviewed and published. | Staff of the MoD, Armed Forces with the support of CIDS |