

POLICY
DOCUMENT:

BUILDING AN INTEGRITY SYSTEM IN THE LOCAL SELF-GOVERNMENT UNITS



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**BUILDING AN INTEGRITY
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SELF-GOVERNMENT UNITS**

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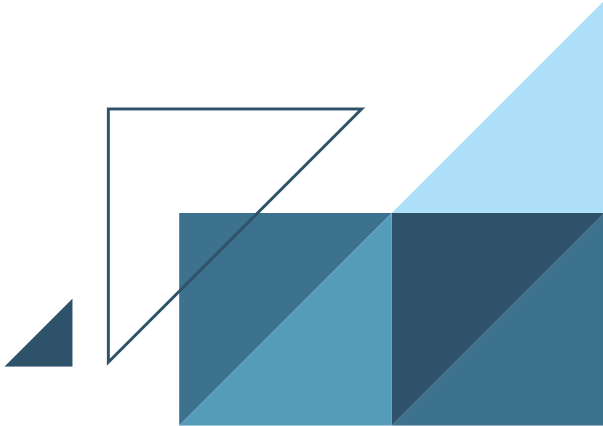
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1. Background: why are institutional integrity and the integrity system important?

The etymology of the term '*integrity*' comes from the Latin words *integras* or *integer*, which mean something untouched, complete, full, harmonious, consistent¹.

In (lat.)
=
No

+

Tangere (lat.)
=
To touch

=

Integer (lat.)
=
Untouched

¹ See: L.W.J.C. Huberts (2018). Integrity: What it is and Why it is Important, *Public Integrity* 20(sup1), available at: <https://www.tandfonline.com/doi/full/10.1080/10999922.2018.1477404> (accessed on 13.11.2024).

Today the term '*integrity*' is used in its original meaning, but it also has other derivative meanings. For example, if we talk about the bodily integrity of an individual, we use the word '*integrity*' in its original meaning – we denote that the body of an individual is untouched, unharmed, i.e. that physical health is not impaired. We can talk about integrity in a different connotation, that is to say as the relation between an individual and moral: a person with integrity is one whose moral values are undamaged, i.e. a person who knows what is right and what is wrong, what is good and what bad. Also, a person with integrity is one who is wise and brave, that is to say a person in whose everyday actions these qualities can be seen². When talking about prevention from corruption, a person's integrity is considered important because it is assumed that a person with integrity will not allow their behaviour to constitute corruption. The fact that integrity in a person is important as regards prevention of corruption is also evident in the fact that the term '*integrity*' is regulated in the Law for Prevention of Corruption and Conflict of Interest in the Republic of North Macedonia³.

In the last decades, the term '*integrity*' is used not only when talking about individuals, but also when talking about institutions, i.e. institutional integrity is mentioned in numerous scientific articles, in documents of international organizations and the civil sector. The question that arises is: What is institutional integrity, if personal integrity is defined as the relation between the individual and the moral reflected in their actions? An additional question is: Why is institutional integrity important? We answer these questions accordingly.

Firstly, it is clear that the institution, unlike the individual, cannot have moral, that is to say strong moral values. Yet in the everyday operation of the institution, the fact that the people that constitute it⁴ possess the abovementioned values and virtues can be reflected. Hence, institutional integrity exists when the institution is fully dedicated to achieving its own lawfully set goals and not others⁵. What does this specifically mean?

2 Similarly: Gabriele Taylor, Raimond Gaita (1981). Integrity, Proceedings of the Aristotelian Society, Supplementary Volumes, vol. 55, pp. 143 – 176, available at: <https://www.jstor.org/stable/4106856> (accessed on 13.11.2024).

3 The Law is published in the Official Gazette no. 12/2019. In legal sense, the term '*integrity*' means "lawful, independent, impartial, ethical, responsible and transparent performance of duties by which officers preserve their reputation and the reputation of the institution in which they are responsible, i.e. employees eliminate risks and remove doubts about the possibility of the occurrence and development of corruption and thus ensure the trust of citizens in the performance of public functions and in the work of public institutions".

4 We consciously use the term "people who constitute" and not the term "employees" or the term "management" i.e. "functionaries" since it is important to emphasize that in order for institutional integrity to exist, appropriate behaviour from everyone is necessary: all functionaries within the institution, but also all employees, irrespective of the position they hold.

5 See: Nikolas Kirby (2022) Institutional Integrity: Its Meaning and Value, Ethical Theory and Moral Practice vol. 25, pp. 809 – 834, available at: <https://link.springer.com/article/10.1007/s10677-022-10330-8> (accessed on 13.11.2024).

If we say that a lawful goal (actually, even constitutional goal) of the local self-government units is to enable the citizens to immediately participate in decision making of local interest, but also satisfy the daily citizens' needs – to provide quality communal services, local road infrastructure, clean local environment, adequate space for recreation and sports etc. A local self-government unit will have institutional integrity (for example a municipality or the City of Skopje) if it works towards these goal with full dedication. If from the daily operations of a local self-government unit it is noticeable that some of the people working in it work on other goals (for example, maximizing personal wealth in an unlawful manner), then we cannot speak of institutional integrity.

Secondly, the importance of existence of institutional integrity is evident. There are negative occurrences when there is no institutional integrity – public resources are used inappropriately and irrationally, service quality drops, operation is ineffective, human resources remain unused or underutilized, and ultimately, citizens' trust in institutions declines.

Institutions need to establish and integrity system to provide their own institutional integrity. An integrity system entails a set of rules and measures whose primary goal is to provide institutional integrity, that is to say rules and measures set to:

- » minimize the risk of occurrence of corruption;
- » enable greater efficiency in decision making and operation, and at the same time not neglect the rules for preventing conflict of interest;
- » minimize the risk of unprofessional conduct, i.e. unprofessional practices (inappropriate direct communication with citizens, late responses, losing documents, etc.);
- » make decisions based on evidence and strengthen citizens' trust⁶.

⁶ Similarly in: <https://www.kas.de/mk/web/nordmazedonien/einzeltitel/-/content/creating-a-european-municipality-integrity-policy-for-zero-corruption-1> (accessed on 13.11.2024).

2. Integrity system of local self-government units in the Republic of North Macedonia

Local self-government is one of the core values of the Constitution of the Republic of North Macedonia⁷. This is stipulated in Article 8 of the Constitution, i.e. at the very beginning of the Constitution. In this sense, the founder of the Constitution considered that it was necessary for a local self-government to exist in the country as a democratic achievement that enables citizens themselves to decide on issues of their interest from a certain area within the state, i.e. to directly participate in the performance of public affairs of local interest. In that sense, the founder of our Constitution accepts the understanding of the Council of Europe expressed in the European Charter of Local Self-Government from 1985 that “local authorities constitute the foundations of any democratic order”⁸.

In the Constitution of the Republic of North Macedonia, there is also a chapter dedicated to local self-government (Chapter V which contains Articles 114-117). Among other things, these provisions stipulate that:

- » citizens are guaranteed the right to local self-government;
- » municipalities are units of local self-government (apart from the City of Skopje which is a separate unit);
- » in local self-government units, citizens directly and through representatives, participate in decision making on issues of local importance, especially in areas regarding public services, urbanism and rural planning, environmental protection, local economic development, local financing, communal activities, culture, sport, social and child protection, education, health protection and other areas determined by law.

7 Constitution of the Republic of Macedonia (Official Gazette no. 52/1991 ... 6/2019).

8 See: Preamble of the European Charter on Local Self-Government. Article 3 of the Charter defines local self-government as “[...] right and ability of local authorities, within legal boundaries, to regulate and govern a significant part of public services for which they are responsible and which are of interest to local population”. The European Charter on Local Self-Government is available at: <https://rm.coe.int/the-congress-booklet-european-charter-of-local-self-government-macedon/168098bc69> (accessed on 14.11.2024).

Local self-government is additionally regulated with several other laws:

Law	What it regulates
Law on Local Self-Government (Official Gazette no. 5/2002 and 202/2024)	Jurisdictions of municipalities, direct participation of citizens in decision-making, organization and work, municipal bodies, municipal administration, acts, etc.
Law on the City of Skopje (Official Gazette no. 22/2004, 158/2011)	Organization of the City of Skopje, as a separate local self-government unit, jurisdictions and financing of the City of Skopje and the municipalities in the City of Skopje, and other issues (the provisions from the Law on Local Self-Government have subsidiary application)
Law on the Territorial Organization of Local Self-Government in the Republic of North Macedonia (Official Gazette no.55/2004, 12/2005, 98/2008, 106/2008, 149/2014)	Areas of municipalities and the City of Skopje, names, seats and borders of municipalities, type and names of populated areas, and merger, division and change of borders of municipalities
Law on Financing Local Self-Government Units (Official Gazette no. 61/2004 ... 170/2024)	Manner in which local self-government units are financed
Other laws that further regulate jurisdictions of local self-government units	Other laws further regulate jurisdictions of local self-government units which are primarily set in the Law on Local Self-Government. Also, laws which regulate working relations of employees in municipalities are important, as well as the Law for Prevention of Corruption and Conflict of Interest which sets general rules for all public sector officials.

Of course, apart from the ones listed in the table, there are other laws that apply to the municipalities and the City of Skopje, among which the Law on Administrative Officers⁹ and the Law on Public Sector Employees¹⁰ (regarding municipal administration), the Law for Prevention of Corruption and Conflict of Interest¹¹ (in the area on prevention of corruption and conflict of interest among officials and employees in local self-government units), the Law on Public Procurements¹² (in the area on public procurements) and others.

The most important among the listed laws is the Law on Local Self-Government in which Articles 20, 21 and 22 regulate the jurisdictions of municipalities. Principally, according to Article 20, municipalities, in accordance with the subsidiary principle, have the right to perform public interest works of local importance in their area which are not excluded from their competence or are not within the competence of state government bodies¹³.

9 Official Gazette no. 27/2014; 199/2014; 48/2015; 154/2015; 5/2016; 80/2016; 127/2016; 142/2016; 2/2017; 16/2017; 11/2018; 275/2019; 14/2020; 215/2021; 99/2022; 208/2024; 210/2024.

10 Official Gazette no. 27/2014; 199/2014; 27/2016; 35/2018; 198/2018; 143/2019; 14/2020; 302/2020; 208/2024; 210/2024.

11 Official Gazette no. 12/2019. This law was already mentioned. See: footnote 3.

12 Official Gazette no. 24/2019 и 87/2021.

13 The same principle of subsidiarity is also provided for in Article 12 of the Law on the City of Skopje.

Additionally, according to Article 21, local self-government units individually, within the boundaries of the law, regulate and perform public interest works of local importance (whereby the competences determined by law may not be taken away or limited except in cases determined by law). Finally, Article 22 lists the competences of local self-government units in 12 lines total, and the thirteenth line states that they may also perform other tasks determined by law.

Municipalities are responsible for the following:

Urban (urban and rural) planning, issuing permits for construction of facilities of local importance

Environmental protection

Local economic development

Communal activities

Culture

Sports and recreation

Social protection and child protection

Education

Health protection

Conducting preparations and taking measures to protect and rescue citizens and material goods from military destruction, natural disasters and other accidents, and from consequences caused by them

Fire protection carried out by territorial fire units

Supervision over performance of tasks within its jurisdiction and

other tasks determined by law

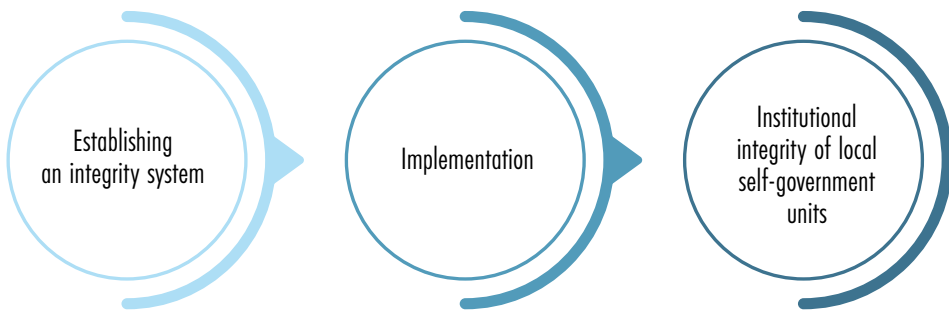
A whole chapter (Chapter IV, i.e. Articles 25-30) in the Law on Local Self-Government is dedicated to direct participation of citizens in municipal decision-making.

Meaning, we can summarize that local self-government units (municipalities and the City of Skopje) in the Republic of North Macedonia are extremely important for each individual in the country. They exist so that decisions and management of local interest works are carried out locally, i.e. to enable citizens to (more) directly participate in decision-making of local importance. Additionally, municipalities should provide citizens with quality public services, no matter if directly or through institutions which they have established (public institutions and public companies).¹⁴ Today, not a single citizen of the Republic of North Macedonia could imagine their everyday lives without the services that municipalities

¹⁴ In theory, public services are defined as actions whose interruption, even briefest, leads to social disorder, i.e. those services that aim to satisfy societal common needs. See: Borce Davitkovski, Ana Pavlovska-Daneva (2018). Administrative law – part one (material law), University “Ss. Cyril and Methodius” in Skopje, pp. 112 – 115, available at: https://www.ukim.edu.mk/e-izdanija/PRF/Administrativno_pravo_1.pdf (accessed on 19.11.2024).

provide (water supply, street lighting, public transport, communal hygiene, municipal schools and kindergartens), let alone imagine how all decisions in the country are made on central level, without the existence of locally elected functionaries and representatives of local environments who would take care of interests in their community. After all, the decline in public service quality provided by municipalities and decision-making without respecting the demands of local communities cause serious problems, as evidenced by numerous articles in the media¹⁵.

Hence, it is clear why it is important to build municipal institutional integrity, that is, why it is especially important that each municipality (irrespective of the size of its area or demographic picture) establishes an integrity system (or have an integrity policy).



In this text we have mentioned that the integrity system is a set of rules and measures aimed at building institutional integrity. More specifically, this would entail¹⁶:

- » establishing rules (norms) for individual and collective behaviour of officers within municipalities and political functionaries elected in local elections (the mayor and council members), that is to say those appointed by them (heads of public companies and public institutions) in which it would be clearly determined that the primary goal of all these people is that through their everyday work they fulfill the purpose of existence of the municipality and/or public company and public institution;
- » existence of codes of conduct;
- » leadership that involves personal example;
- » efficient and effective training for continuous professional development of officials, but also for strengthening knowledge in terms of integrity, prevention of conflict of interest, etc.;

¹⁵ It is enough to point to recent examples of dissatisfaction with public transport in Skopje, the justification of which is also evidenced by the negative findings of the State Audit Office in the public transport company. See: <https://novamakedonija.com.mk/makedonija/jsp-skopje-ne-e-vo-sostojba-da-obezbedi-kvalitetni-i-navremeni-uslugi-zakluchuva-dzr/> (accessed on 19.11.2024).

¹⁶ Taken from: Ana Pavlovska-Daneva, Konstantin Bitrakov (2022). Manuel integrity persons in local self-government units. Open Society Foundation – Macedonia, available at: <https://fosm.mk/wp-content/uploads/2022/11/priracnik-za-liczata-za-integritet.pdf> (accessed on 19.11.2024).

- » internal controls and continuous integrity review;
- » determining integrity persons;
- » adopting plans for prevention of corruption or integrity plans, in regular intervals, so that evidence-based measures and activities are planned;
- » implementing a merit system in recruiting, assessing and promoting personnel;
- » creating conditions for free expression of opinions and ideas, and free registering of unethical situations and behaviours, even more so criminal offences.

2.1. Rules (or norms) for individual and collective behaviour and codes of conduct

Norms of conduct are not legally binding. In fact, they do not even arise from a legal act as such, although they translate and/or reflect legally binding norms. It is to do with developing guides, guidelines, manuals, and instructions for behaviour of people in municipalities in different situations. Of course, the municipality (the City of Skopje) does not have to prepare or adopt their own guide/manual, they can use already developed ones from other organizations if they are deemed adequate (from other municipalities, from the State Commission for Prevention of Corruption, from non-governmental organisations, etc.)¹⁷. However, if it is decided that guides/manuals from other organizations will be applied, special attention should be paid for these to be presented to all employees in the municipal administration, but also the functionaries. Also, in certain aspects, these guides and manuals should be adapted to the needs and real examples of the municipality.

In any case, it is important that every municipality owns and that all persons are presented with norms of conduct – simple guidelines on how they should behave in different everyday situations (irrespective of whether we are talking about behaviour during inspection supervision, issuing administrative acts such as permits, licenses, approvals, decisions or real acts, behaviour during a simple oral conversation with a client who wants to consult, etc.). Following are a few examples of such norms:

- » The officer is obligated to be present in their office during the time designated for receiving clients;
- » The officer will refuse any offer of a gift if the administrative procedure is ongoing and the party or their representative offers the gift (the same applies to persons close to the officer);
- » The officer should pay particular attention to the rules on exemption from the Law on General Administrative Procedure, as well as the rules for prevention of conflict of interest from the Law on Prevention of Corruption and Conflict of Interest;
- » Official vehicles of the municipality will be marked with the municipality's insignia, and their use for purposes other than official ones is strictly prohibited;
- » If the employee drives a municipal official vehicle for justified reasons after working hours, they will treat the vehicle with special care and will not commit any offense or irregularity that would violate the integrity of the municipality;
- » The officer will address the clients politely and answer all questions, and in case they are unable to answer a question, they will refer the clients to the appropriate officer and provide contact information;

- » During every regular supervision with the subject, the inspector will share the check list and allow reasonable time for the subject to read and understand the list;
- » All check lists of the municipal inspection service are published on the municipality's web-page;
- » At the entrances to municipalities there are lists for officer evaluation with short and simple questions that the clients fill and anonymously put in a closed box (the content of the box is checked and registered by a person or organizational unit from human resources and the integrity person) [...] ¹⁸

In order to continually strengthen institutional integrity on municipal level, it is necessary that there exist not only norms for conduct, but also conduct regular internal counseling on integrity on the whole municipal administration level, in one or more organizational units (sectors, departments) with the participation of persons in charge of human resources and the integrity person. This counseling does not have to and should not mean spending municipal money. They can be simple meetings with colleagues in available municipal offices where issues on integrity will be discussed: officers' relations to clients; clients' reactions to some officers noted in the evaluation lists or other ways; dress code; manner of addressing clients; possible conflict of interest in various processes and ways to eliminate it; how to attract young ambitious people to become part of the municipal administration, etc.

As we already mentioned, the norms of conduct do not only have to do with municipal administration, but also municipal functionaries. So for example, in the respective guides, manuals or similar guidelines for the mayor should also be stipulated:

- » The mayor will not appoint the same person for acting director more than once;
- » When appointing an acting director of a public company, the mayor will take all necessary measures in the appropriate period in order to publish a call and select a director of a public company with a determined mandate;
- » The mayor will appoint an acting director of public companies from the employees;
- » In cases when the public companies have financial losses, the mayor will request appropriate information from the director, and if there is no success in eliminating these losses, the mayor will dismiss the director;
- » The mayor will not meddle in decisions which, according to law, are made by directors of public companies and public institutions, i.e. issue illegal orders for processes inside public companies and public institutions, i.e. the mayor will only supervise the legality to the extent permitted by law;

18 More such examples in the manual are mentioned in footnote 16: <https://fosm.mk/wp-content/uploads/2022/11/priracnik-zaliczata-za-integritet.pdf>, p. 9.

- » When the mayor adopts discretionary acts (acts of free assessment), they will specifically be explained (if the nature of work allows it);
- » The mayor will delegate the authorities to decide in administrative procedures in accordance with the Law on General Administrative Procedures;
- » The mayor will not use the official vehicles of the municipality for their personal activities which are not related to their position (participation in political party activities, private obligations, etc.);
- » When communicating with journalists, the mayor will be respectful and address the office with dignity;
- » The mayor will organize public meetings with citizens at least once, every quarter;
- » When a municipal proposal budget is being created, the mayor will open a separate e-mail address, organize gatherings or in other ways organize meetings with citizens;
- » The mayor will not initiate procedures for temporary employment where there are conditions to employ a person for an indefinite period and for temporary employment; except in cases of emergency, private temporary employment agencies will not be used [...]

In this sense, within the municipality, in addition to creating guides and manuals, (legally non-binding) codes of conduct can also be adopted, which will generally regulate how officials and functionaries behave.

2.2. Leadership that involves personal example

It is necessary to bear in mind that a municipality's institutional integrity cannot exist if the mayor does not build it and maintain their own personal integrity, which will serve as an example for the municipal administration, but also other functionaries in local public companies and public institutions. Of course, the same applies to the Council members, but the importance of the mayor's personal integrity is greater considering that they are perceived as a leading figure within the municipality and that they directly manage the municipal administration. Hence, through their daily behaviour, the mayor is the one who can have the greatest impact on building a culture of ethical behaviour. Of course, this should not be misunderstood in the sense that the mayor's behaviour decreases the importance of norms of conduct. Both elements are necessary and complement one another when it comes to building institutional integrity¹⁹.

2.3. Trainings

The integrity trainings or conduct trainings are an exceptionally important segment in the integrity system. It should be considered that integrity is a relatively new category which is slowly being introduced in the Macedonian public sector, which is why it is necessary to continuously have trainings of public sector stakeholders which include how to align one's behaviour with integrity standards. Additionally, today's society notes frequent and rapid changes that also inevitably influence the manner in which people communicate, citizens' expectations from the officers, the mayor and other municipal stakeholders (even the municipality as such).

In this context, the people that comprise the municipality need:

- » trainings whose central theme is integrity, the importance of this word and the way in which to improve it, i.e. trainings on prevention of conflict of interest and corruption;
- » trainings on how to communicate with clients, how to use new technologies that will speed up the municipal processes;
- » trainings on the new laws and bylaws, etc.

19 In the work The Institutionalization of Integrity in Local Government (see: https://www.researchgate.net/publication/256040535_The_Institutionalization_of_Integrity_in_Local_Government/figures, accessed on 19.11.2024) Hoekstra and Kaptain cite a work from other authors (p. 11) according to which informal processes play a vital role in establishing and maintaining an ethical climate, which is also influenced by the activities of colleagues and superiors, but in order to ensure ethical behaviour there should also be formal systems and clear standards according to which employees can model their behaviour.

The first are trainings whose direct goal is to deepen knowledge concerning integrity and indirectly raise awareness of its meaning. These types of trainings do not have to be organized within the municipality itself, considering that they are often organized by other bodies, and the leading body among them is the State Commission for Prevention of Corruption itself. In this sense, the municipal representatives should attend these trainings. This, of course, does not mean that the municipality cannot organize their own trainings, if there is such an initiative. Trainings organized by the municipality should not require spending a lot of money or extraordinary effort. Several hours a week are enough to organize a training led by human resources or the integrity person regarding new integrity concepts and new mechanisms for prevention of corruption and conflict of interest, at both domestic and international level.

The others are trainings whose central theme is not integrity or prevention of conflict of interest and corruption, but rather trainings whose goal is to strengthen different kinds of knowledge and skills among employees. We highlight them as important since they indirectly influence the strengthening of institutional integrity. The speeding of processes and more efficient operation itself (which is in compliance with the law and in which errors are rarely observed) also implies strengthened integrity and favorable perception of the municipality among citizens. Also, if officers continuously upgrade their communication skills so that they can appropriately communicate with the elderly population, as well as the youth who have just become adults, they will indirectly influence the increase of citizens' trust in general²⁰. Furthermore, if municipal employees develop skills for working on opening municipal data (open data), citizens and the private sector will be able to use this data significantly more easily, which will in turn make them feel more close to their municipality. There are numerous such examples. These trainings can be organized by the municipality itself in cooperation with other stakeholders, such as scientific and educational institutions, non-governmental sector and foreign donors, and in case they get organized by a central state body for officer training (in the future) the municipal employees should attend.

20 It is not necessary to elaborate that with every new generation, there is a change in people's habits as well. If in the past it was acceptable for a client to wait for several hours in the municipal premises, today it is more likely that the client will resort to communicating with the municipality through social media, e-mail, etc., and they will expect an answer as soon as possible (and if they do not receive an answer soon, they feel lack of trust toward the municipality). Also, if a few decades ago it was acceptable for citizens to read municipal announcements and/or other addresses and notifications which were a few pages long, today's habit of individuals demand short and clear announcements that directly convey the necessary message.

2.4. Internal control and continuous integrity review, as well as nominating and integrity officer

Continuous integrity assessment means that there should be an established system which will enable monitoring and improvement of municipal officers' behaviour. Previously in the text we already mentioned that it is advisable to set up evaluation lists which will enable the citizens to provide their comments on officers' behaviour. But this is not the only mechanism. In order for continuous integrity assessment to exist, it is important to find another way to enable citizens to provide the municipality with suggestions which do not have to do with a specific individual from the municipal administration. Additionally, it is necessary to appoint an integrity person who will be in charge of monitoring situations regarding integrity and who will:

- » prepare reports with noted problems and present them to human resources and/or the municipal secretary;
- » prepare and hold regular integrity counseling on municipal level, in specifically determined intervals or as needed;
- » directly meet citizens when they have certain complaints, grievances or suggestions on how to improve operations within the municipality;
- » keep records of submitted complaints (which can be in a separate ledger) in order to monitor possible improvements/deteriorations in conditions, etc.;
- » advise certain officers, in the event of identified problems, on how to improve their communication with clients and operations;
- » inform clients that in a given case officers did everything necessary in accordance with the law, in cases where there will be reactions from citizens but in which officers behaved appropriately;
- » share with officers, the mayor and the Council materials on integrity, prevention of corruption and conflict of interest, etc., published by the State Commission for Prevention of Corruption, other bodies, non-governmental sector, etc., which may be useful to them in their work and/or actions, and
- » perform other tasks.

The integrity person may be an employed administrative officer (meaning that the existence of an integrity person does not entail spending money from the municipal budget). In such cases, considering the gravity of their role (which directly renders personal integrity and the integrity of the position necessary), it is advisable for the integrity person to be from level C (professional administrative officers), even more so level B (managerial officers). In the context of their work, this can be a person who works

in legal matters, human resources, etc. Although, at first glance, the above-mentioned tasks of the integrity person may seem burdensome, it should be noted that a significant part of the activities of the integrity person are carried out in close cooperation with other persons, so they will not be an extraordinary burden on the integrity person.

In order to better understand the role of the integrity person, their tasks can be divided into several groups²¹:

Designing (or creating) integrity policies	Design or redesign specific policies to strengthen integrity (i.e. form integrity plans, develop instruments and materials).
Implementing integrity policies	Advise people within the organization how to behave in order to increase integrity (organize trainings, i.e. coordinate trainings and counseling, guiding employees and other people about which materials to use and how to solve ethical dilemmas or dilemmas concerning conflicts of interest, etc.).
Monitoring	Regularly monitor the situation regarding integrity and prepare regular or extraordinary reports.
Reviewing	Investigate findings regarding behaviour contrary to binding and non-binding rules. ²²

²¹ Taken (and paraphrased) from: Alain Hoekstra, Muel Kaptein (2013). The Institutionalization of Integrity in Local Government, Public Integrity, p. 19, available at: https://www.researchgate.net/publication/256040535_The_Institutionalization_of_Integrity_in_Local_Government/figures (accessed on 19.11.2024).

²² This final task is limited considering that one administrative officer cannot go beyond their authorizations and conduct an investigation. However, an investigation can be meeting citizens in order to familiarize themselves with findings, talking to the officers involved, etc.

2.5. Integrity plans or plans to prevent corruption

The preparation of plans, as already mentioned, is extremely important when it comes to building institutional integrity. We are talking about two types of plans: integrity plans and corruption plans. These two types of plans are quite similar; the first is slightly broader than the second (considering that strengthening integrity encompasses broader measures than the measures for prevention of corruption). In any case, the plan for prevention of corruption has a serious impact on building integrity considering that prevention of corruption is complementary to the existence of institutional integrity.

The existing states concerning integrity, i.e. corruption, need to be acknowledged in the plans and then appropriate measures will be planned to better the situation. When talking about acknowledging the current situations, we are referring to a narrative description in which, among others, attention will be paid to:

- » the goal of the municipality as such, i.e. its functions in accordance with the Constitution and the laws;
- » existing studies and analysis, i.e. surveys, where risks from corruption and/or risks for the integrity of a specific municipality are mentioned, but also municipalities in general²³, along with findings about citizens' trust in the municipality or other citizens' perceptions²⁴;
- » findings in reports prepared by the integrity person during the previous period, if any, but also measures taken in terms of strengthening integrity;
- » measures taken based on previous plans (if any);
- » findings from conducted audits by the State Audit Office, if an audit had been conducted and
- » other aspects.

23 These can be general, i.e. refer to all processes in the municipalities, but also specific that will only refer to certain aspects of operations. For example, as specific analysis we can single out the mapping of risks from corruption in public procurements in the municipalities done by the Center for Civil Communications. (<https://www.opendata.mk/Home/TekstualniDetails/103?Category=2>), mapping the risks from corruption on the environment (<https://fosm.mk/wp-content/uploads/2022/02/mapiranje-rizici-od-korupcija-zs.pdf>) etc. (all links accessed on 19.11.2024).

24 An example of a study on citizens' perceptions for several municipalities can be found at the following link: <https://fosm.mk/wp-content/uploads/2021/03/analiza-na-percepcijata-na-grag%CC%81anite-za-korupcija-vo-pet-opshtini.pdf> (accessed on 19.11.2024). This report on citizens' perceptions in five municipalities, for example, states that citizens believe that corruption is widespread among directors of public institutions. In this sense, the integrity plan/corruption prevention plan should reflect this and include measures to strengthen trust in lawful working of directors of municipal companies and institutions.

After the narrative part in which the current situation is explained, it is necessary to plan measures/activities for improving the situation. It is recommended that the measures/activities/actions be divided in areas, so that the plan itself is easier to follow, read and understand. For example, we can talk about the following areas (according to the principle of functionality):

- » public procurements
- » conducting administrative procedures and providing services
- » employment and other forms of engagement of persons in the municipality
- » appointing directors and other functionaries
- » managing public finances and
- » other

For greater clarity of the measures/activities/actions, it is recommended to present them in a table so that next to each measure is the person responsible for conducting the measure (from the municipal administration), but also the period in which it should be conducted and activity and performance indicators. The table should look something like this:

Area:				
Action:	Period:	Responsible person:	Activity indicator:	Performance indicator:

For example, public procurements can be listed as an area. An action can be to prepare an analysis of the reasons for frequent cancellations of tenders, a responsible person would be someone working in the public procurement department, and an activity indicator would be the published analysis. Ultimately, a performance indicator would be the reduced number of cancellations.

The columns can be organized differently, and if the municipality deems it appropriate, it can add other columns as well (for example expected results, risks from non-fulfillment of measures, etc.). The integrity person will of course have the primary role in preparing the plan and they will receive findings and materials (input) from all organizational units regarding the appropriate areas and activities.

There are several examples of integrity plans, i.e. plans for prevention of corruption, which can serve as a starting point when constructing the plan of a specific municipality (especially in terms of its form, considering that the content may differ).²⁵

Finally, what is important is to emphasize that the plan itself, apart from the fact that it should be prepared, should be formally adopted by the municipality Council, but even more importantly is to act upon it (in other words, the plan must not only remain on paper). In this regard, reports are important for supervision, and they should be as simple and as clear as possible (comprised of just a few pages, noting what has been implemented and what has not).

2.6. Implementing a merit system in recruiting and promoting personnel

There is no need to specially elaborate why the implementation of a merit system is an important aspect on institutional integrity. Recruitment based on other criteria (political party connection, other kinds of closeness with the candidates) directly derogates a municipality's integrity and has far-reaching consequences: not only will there be doubts about the quality of the specific recruited person, but the citizens' trust will decrease, chances of making mistakes in the operations will increase, the opportunity to employ more appropriate personnel will be missed and the young who demonstrate a high level of professionalism will be demotivated to even apply for employment in the municipality in the future. Similarly, it is unacceptable to promote personnel (officers) who do not deserve it. Consistent implementation of the merit principle while recruiting entails several separate activities: excluding persons in accordance with legal norms; reporting conflicts of interest; conducting employment procedures in accordance with legal norms; systematization of jobs in accordance with real needs and not demands, i.e. needs of a certain individual or group, etc. [...] basically, the implementation of the merit system is maybe the most important aspect in building an integrity system, which is why it is necessary to consistently and fully comply with existing regulations and not violate their provisions, and find creative ways to circumvent certain obligations. As regards promotions, the mayor and secretary of every municipality should pay attention so that every person who shows quality in their work gets promoted in an appropriate time period, so that conditions are created to keep quality personnel in service and motivate them.

25 Example: Integrity plan of the Ministry of Defense for 2024 (<https://mod.gov.mk/storage/2021/09/Plan-za-integritet-MK-2021-2024.pdf>), Integrity plan of the Municipality of Karpos for 2025 (<https://karpos.gov.mk/wp-content/uploads/2017/08/Plan-za-integritet-Opstina-Karpos-2021.pdf>), Integrity plan of the Ministry of Interior Affairs until 2025 (https://mvr.gov.mk/Upload/Editor_Upload/Plan%20za%20integritet%202023-2025/Plan%20za%20integritet%20MVR%202023-25_04_06_2023_MKD_web.pdf) and others (all links accessed on 19.11.2024).

Regarding motivating the personnel, it is especially important to reward them. The Macedonian laws currently do not allow monetary rewarding of personnel. However, this does not mean that there are no other ways, which are not contrary to the law, to reward quality officers who stand out from their colleagues and demonstrate high motivation for work: initiating announcements of “officer of the month” or “officer of the year”; reward best-rated officers by choosing the training they want to attend outside the municipality which they need for work; recognition for an officer who has received praise from citizens and the likes.

2.7. Conditions for free expression of ideas, opinions

From everything that has been said so far, it is already evident that it is essential that in every organization, as well as municipality, there is a climate in which opinions, ideas, etc. about improvements can be expressed freely, both during direct meetings and during integrity counseling and training. This is connected to all the previous activities, especially leadership through personal example and behavior of the municipality mayor (following with that of the secretary).

3. Conclusion

It is essential that municipalities (and the City of Skopje) in the Republic of North Macedonia build their own institutional integrity and for that they need to establish an integrity system. In conditions of dynamic lives, rapid and drastic changes of society, decreased trust in institutions in general, changing of generational habits and a general feeling of alienation of citizens from institutions, municipalities (and their public companies and institutions) are often the first instance citizens contact and they have a huge influence in forming their perception about the entire public sector, but also building active, responsible and involved citizens.

