EuropeAid/139891/DH/SER/MK

Service Contract No. 2019/410-977

(Addendum 1 to Contract 2019/410-977)

Final Report

Reporting Period:
11 November 2019 – 10 November 2022

Skopje, December 2022
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## Abbreviations

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<th>Abbreviation</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>AC</td>
<td>Anti-corruption</td>
</tr>
<tr>
<td>CA</td>
<td>Contracting Authority</td>
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<tr>
<td>CoE</td>
<td>Council of Europe</td>
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<tr>
<td>COSO</td>
<td>Committee of Sponsoring Organizations of the Treadway Commission</td>
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<td>CS</td>
<td>Steering Committee</td>
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<tr>
<td>CSO</td>
<td>Civil Society Organisations</td>
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<tr>
<td>APRFAPI</td>
<td>Agency for Protection of the Right to Free Access to Public Information</td>
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<tr>
<td>DMS</td>
<td>Document Management System</td>
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<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>EUD</td>
<td>Delegation of the European Union</td>
</tr>
<tr>
<td>ICA</td>
<td>International Consulting Alliance</td>
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<tr>
<td>IIA</td>
<td>The Institute of Internal Auditors</td>
</tr>
<tr>
<td>IR</td>
<td>Inception Report</td>
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<tr>
<td>KE</td>
<td>Key Expert</td>
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<tr>
<td>MISA</td>
<td>Ministry of Information, Society and Administration</td>
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<tr>
<td>MoM</td>
<td>Memo of a meeting</td>
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<tr>
<td>NACS</td>
<td>National Anti-Corruption Strategy</td>
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<tr>
<td>NKE</td>
<td>Non-key Expert</td>
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<tr>
<td>MMSI</td>
<td>North Macedonia Support Initiative</td>
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<tr>
<td>OGP</td>
<td>Open Government Partnership</td>
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<tr>
<td>OSCE</td>
<td>Organisation for Security and Co-operation in Europe</td>
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<tr>
<td>PAR</td>
<td>Public Administration Reform</td>
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<tr>
<td>PM</td>
<td>Project Management</td>
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<tr>
<td>PMM</td>
<td>Project Management Methodology</td>
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<tr>
<td>PR</td>
<td>Progress Report</td>
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<tr>
<td>RCC</td>
<td>Regional Cooperation Council</td>
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<tr>
<td>SCPC</td>
<td>State Commission for the Prevention of Corruption</td>
</tr>
<tr>
<td>SEA</td>
<td>Secretariat for European Affairs</td>
</tr>
<tr>
<td>TA</td>
<td>Technical Assistance</td>
</tr>
<tr>
<td>TOR</td>
<td>Terms of Reference</td>
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<tr>
<td>USAID</td>
<td>United States Agency for International Development</td>
</tr>
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</table>
## Project Synopsis

<table>
<thead>
<tr>
<th>Programme Name</th>
<th>EU support to public administration reform and statistics</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Name</strong></td>
<td>Promoting transparency and accountability in public administration</td>
</tr>
<tr>
<td><strong>Reference No:</strong></td>
<td>EuropeAid/139891/DH/SER/MK</td>
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<tr>
<td><strong>Contract Number</strong></td>
<td>2019/410-977</td>
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<tr>
<td><strong>Project Duration</strong></td>
<td>36 months</td>
</tr>
<tr>
<td><strong>Project Commencement Date</strong></td>
<td>11 November 2019</td>
</tr>
<tr>
<td><strong>Project End Date</strong></td>
<td>10 November 2022</td>
</tr>
<tr>
<td><strong>Name:</strong></td>
<td>Republic of North Macedonia State Commission for Prevention of Corruption Republic of North Macedonia Agency for Protection of the Right to Free Access to Public Information Delegation of the European Union to North Macedonia</td>
</tr>
<tr>
<td><strong>Role:</strong></td>
<td>Beneficiary Beneficiary Contracting Authority Contractor</td>
</tr>
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<tr>
<td><strong>Fax:</strong></td>
<td>+389 2 3114 695</td>
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<tr>
<td><strong>E-mail:</strong></td>
<td><a href="mailto:contact@dksk.org.mk">contact@dksk.org.mk</a> <a href="mailto:aspi@aspi.mk">aspi@aspi.mk</a> <a href="mailto:delegation-north-macedonia@eeas.europa.eu">delegation-north-macedonia@eeas.europa.eu</a></td>
</tr>
<tr>
<td><strong>Contact Person:</strong></td>
<td>Maja KONEVSKA Aleksandra STOJANOVSKA Ruzica ANDRONIKOVA Annabelle REGAL Dragana DAVITKOV</td>
</tr>
</tbody>
</table>

### Overall Objective

To strengthen ethics, integrity, transparency and accountability of public administration.

### Purpose

The purpose of this contract is to strengthen the capacities of the APRFAPI and the SCPC, with the aim of improving their operational functioning, contributing to increasing integrity and ethics of public institutions, as well as improving transparency and accountability of public administration.

### Project Components

- **Component 1:** Support to the State Commission for Prevention of Corruption in ensuring transparency, integrity and ethics in public institutions.
- **Component 2:** Support to the Agency for Protection of the Right to Free Access to Public Information, aimed at improved transparency and accountability.

### Expected Results

- Improved integrity, accountability, transparency and ethics in public institutions.
- Raised public awareness for the inclusion of the society in the fight against corruption and for free access to public information.
- Improved and upgraded operational, institutional and IT capacities of the SCPC and APRFAPI.
- Improved communication and cooperation with information holders, officials and officers.
- SCPC to have improved data access for checking assets, and potential conflict of interest of public officials and public sector employees.
- Strategy for free access to public information 2018 – 2020 fully implemented and new strategy for free access to public information developed (including action plan).
- Transparency standards set at central and local level, and a comprehensive system of accountability of the state bodies.
- Number of by-laws to the new law on free access to public information prepared.
- Harm-test on the application of the provisions on classified information, analysis on the definition and use of classified information provisions performed.
- Trained APRFAPI staff and stafl and of the information holders on the new legal provisions.
- Transposed European legislation on the re-use of public sector information.

### Target groups

The project beneficiaries are State Commission for Prevention of Corruption and the Agency for Protection of the Right to Free Access to Public Information. Other indirect stakeholders are all public institutions, concerned under the respective laws, as well as the citizens of the country.

### Reporting Period

| **Report No.** | 11 November 2022 – 10 November 2022 |
| **Author of the Report** | Elena GOTOVSKA, Project Leader in charge of administration and coordination of the project components |
1 EXECUTIVE SUMMARY

During 36 months of implementation, the project “Promoting Transparency and Accountability of Public Administration” focused on strengthening the mechanisms of the ethics, integrity, transparency and accountability of public administration, as prerequisites for enhancing the fight against corruption and strengthening the mechanisms for prevention of corruption in the Republic of North Macedonia.

The project was organised in two components, and it focused on:

1. Strengthening the capacities of the State Commission for Prevention of Corruption (SCPC) in ensuring the transparency, integrity and ethics in public institutions, and
2. Supporting the Agency for Protection of the Right to Free Access to Public Information (APRFAPI), to improve the transparency and accountability of the public administration.

The beneficiary of Component 1 was SCPC. The focus of this component was on building integrity, transparency and accountability of the civil servants and public institutions. Through the project activities the team strengthened the SCPC capacities to support the institutions in fight against corruption by promoting and implementing the integrity concept with its elements: transparency, ethical behaviour, accountability... with this, the project strengthened the SCPC capacity to comply with the EU standards and good EU practices.

Under Component 1, the project provided technical support in the key areas as summarised in the figure below.

- Strengthening the capacities of the SCPC through trainings and improvement of the organisational units for better execution of the functions stipulated in the relevant laws
- Development of IT tools for improved communication and measurement of the performance, transparency and accountability of the SCPC
- Promotion of the integrity concept and its implementation on political and professional level
- Support the implementation of the Law on Whistle-Blowers Protection and raising awareness of the positive context of whistle blowers protection
- Support for development and implementation of tailor-made anti-corruption campaign
- Upgrade and interconnection of the e-Learning platform of the SCPC with MISA and development of e-learning lessons
- Support the implementation of the National Strategy for Prevention and Repression of Corruption and Conflict of Interest (2020-2024), using, among others, the interoperability platform for automatic verification of submitted data

The following activities were delivered under Component 1:

December, 2022
- Activity 1.1: Support to strengthening the capacities of the State Commission for Prevention of Corruption
- Activity 1.2: Support to development of Integrity Concept
- Activity 1.3: Support to implementation of the Law on whistle-blowers protection
- Activity 1.4: Support to develop and implement tailor-made anti-corruption Campaigns
- Activity 1.5: Upgrade of the e-Learning platform and interconnection with the learning management system in the ministry of information society and administration corruption and conflict of interests
- Activity 1.6: Support the adoption of the National Strategy for prevention and repression of corruption and conflict of interest.

APRFAPI was the beneficiary of Component 2 of the project. The aim of this component was to strengthen APRFAPI’s organisational capacities to support the public sector institutions to act proactively in the field of free access to public information. To do so, the project promoted the right of free access to public information, enhanced the knowledge of the stakeholders (information holders and information requestors) on the importance of the implementation of the legislation on free access to public information, and designed IT tools, that contribute to and support increased accountability and transparency of the information holders.

The technical assistance for APRFAPI covered the following areas:
Under Component 2, the following activities were implemented:

- Activity 2.1: Upgrade the capacity and competences of the Commission for Protection of the Right to Free Access to Public Information
- Activity 2.2: Support and strengthen capacities of the public information holders and raise general awareness on the right to free access to public information.
- Activity 2.3: Support the implementation of the strategy for free access to public information 2018 – 2020, and develop a new strategy 2020 – 2024

The project activities were implemented under the coordination and supervision of the project key experts and the project management team. Except for the 3 key experts: Team leader / Expert in the area of prevention of corruption, Expert in the area of free access to public information, and IT expert, who utilised a total of 782 working days (304; 238 and 240 accordingly), additional 53 local and senior junior non-key experts were engaged, covering more than 60 different positions throughout the project implementation period. A summary overview of the human resources deployed and used under the project is presented in the table below.

<table>
<thead>
<tr>
<th>Position</th>
<th>No. of working days</th>
</tr>
</thead>
<tbody>
<tr>
<td>Team Leader / Expert in the area of prevention of corruption</td>
<td>304</td>
</tr>
<tr>
<td>Key Expert 2: Expert in the area of free access to public information</td>
<td>238</td>
</tr>
<tr>
<td>Key Expert 3: IT Expert</td>
<td>240</td>
</tr>
<tr>
<td>Senior Non-Key Experts</td>
<td>1,365</td>
</tr>
<tr>
<td>Junior Non-Key Experts</td>
<td>755</td>
</tr>
</tbody>
</table>
2 REVIEW OF THE PROGRESS AND PERFORMANCE

2.1 Policy and programme context

Integrity remains a challenge for good governance of the public administration, and corruption, as prevalent in many areas, is an issue of concern.

According to the last EC “North Macedonia Report 2022”¹ North Macedonia is moderately prepared with regards to the public administration reform, and the following progress and challenges in prevention and fight against corruption have been identified and summarised with the report:

3 The country is party to all international anti-corruption conventions, including the United Nations Convention against Corruption.
4 Progress has been made in investigating, prosecuting and trying several corruption cases, including high level corruption.
5 The cases that were initiated by the former Special Prosecutor’s Office (SPO) moved forward, however a need for additional human and financial resources to the Public Prosecution Office (PPO), the investigative centres and law enforcements units in charge of investigating corruption, is identified.
6 Sectors most vulnerable to corruption require targeted risk assessments and dedicated actions; this has been piloted through the Project, and its enforcement should be mainstreamed through the SCPC.
7 The Judicial Council adopted its programme and action plan for the prevention of corruption in the judiciary for 2022-2025; the Council needs to strengthen its role as guardian of the independence and impartiality of judges, and to improve its transparency.
8 The Council of Public Prosecutors appointed five prosecutors in the Public Prosecutor’s Office for Prosecuting Organised Crime and Corruption (OCCPPO). OCCPPO opened investigations into seven cases of alleged corruption against 25 suspects (14 high-profile investigations involving 49 individuals in 2020). Investigations are ongoing against 21 individuals regarding alleged abuse of official position and against nine individuals on alleged money laundering.
9 The SCPC continued to fulfil its role proactively and opened several new cases. In 2021, the SCPC processed a total of 106 cases 22 of alleged conflict of interest, of which 17 were initiated by the SCPC itself and 89 at the request of other parties. In 2021, 152 cases were closed (149 in 2020), of which 12 dated from 2019 and six from 2020. In 2021, a conflict of

interest was established in two cases for which the initiatives submitted to the competent authority were to determine responsibility, resulting in one disciplinary procedure. In one case, the SCPC submitted an initiative for criminal proceedings against two responsible officials, and issued a public reprimand for failure to remedy a conflict of interest. The SCPC has issued opinions on all 85 requests received. The SCPC found grounds for suspected breaches of the Law on the prevention of corruption and conflict of interest, resulting in 32 misdemeanour payment orders.

In 2021, a total of 599 cases of corruption were initiated, 16 at the initiative of the SCPC and 583 based on reports submitted by third parties. 404 cases were addressed. Of the cases submitted on the basis of reports, the SCPC found grounds for suspected breaches of the Criminal Code in seven cases and submitted initiatives to the public prosecutor (two cases in 2020). The SCPC launched initiatives before the competent authorities to ascertain the responsibility of officials in five cases.

In 2021, assets were confiscated in four cases for a value of approximately EUR 256,000. Real estate, movable and immovable property, and shares were frozen in temporary measures in three cases of alleged corruption. The confiscation of criminal assets should become a strategic priority in the fight against organised crime, terrorism and high-level corruption in the country.

National authorities should implement more effective anticorruption measures in the procurement cycle.

The cooperation among the Public Procurement Bureau (PPB), the Ministry of Economy and the State Appeals Commission (SAC) remains insufficient. A more effective exchange of data and information should be ensured including with the State Commission for the Protection of Competition, the State Audit Office (SAO) and the State Commission for the Prevention of Corruption.
For the goals of the project “Promoting transparency and accountability in public administration in North Macedonia”, financed by the European Commission, during the period from 27th January to 3rd February, 2022, engaged TIM Institute conducted public opinion survey on citizens’ perception on corruption and integrity through a CATI telephone survey with 1029 respondents.

The interviewing was in Macedonian and in Albanian.

A significant decrease of the overall level of corruption in the country in the last 12 months is noticed by only 2% of the citizens, while 8% of the citizens believe there is a decrease, but they assess it as insignificant. 36% of the citizens do not notice any change regarding the level of corruption. 20% of the respondents stated it has increased insignificantly, while one third of the respondents (34%) notice a significant increase of the level of corruption in our country.

Ethnic Macedonians and the citizens with higher education in a higher percentage state there has been a reduction in corruption (significant or insignificant) in the last 12 months.

Chart 1 (Q1). Compared to 12 months ago, do you consider the overall level of corruption in North Macedonia has increased or decreased?
Over half of the citizens (59%) completely agree that corruption is a burning issue in our country, while only 1% of the citizens think that corruption is not an issue at all in North Macedonia. Compared to the data from the previous research conducted in October 2020, there is an increase of 6 percentage points in the responses of the citizens who believe that corruption in our country is a major problem.

The absence of penalty for those who committed corrupt activities is the most frequently mentioned reason for corruption in our country. The other most frequently mentioned reasons for corruption are:

- Personal wealth acquired through corrupt practices by officials is not confiscated
- The mild penalties do not discourage the offenders to commit corrupt activities
- The drawbacks in the laws that allow committing corrupt activities
- The mentality of the people who accept asking for or giving bribe

The table below illustrates the respondents' answers to all 9 statements in both surveys, in 2020 and 2022. The biggest change in the answers is noticed in terms of the statements The mentality of our people accepts asking for or taking bribe and the state institutions and offices lack appropriate controls. In both statements, the volume of responses decreased by 15 percentage points compared to the research conveyed in 2020.

<table>
<thead>
<tr>
<th>Statement</th>
<th>October, 2020</th>
<th>January, 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>The officials have low salaries</td>
<td>7</td>
<td>9</td>
</tr>
<tr>
<td>Proper ethics / morality lacks</td>
<td>18</td>
<td>13</td>
</tr>
<tr>
<td>Whistle-blowers who attract attention for corrupt acts are not protected</td>
<td>9</td>
<td>19</td>
</tr>
<tr>
<td>Appropriate controls lack in state institutions and offices</td>
<td>35</td>
<td>20</td>
</tr>
<tr>
<td>The mentality of our people accepts asking for or taking bribe</td>
<td>40</td>
<td>25</td>
</tr>
<tr>
<td>The drawbacks in the laws allow corrupt actions</td>
<td>40</td>
<td>36</td>
</tr>
<tr>
<td>The mild penalties do not discourage the offenders to commit corrupt activities</td>
<td>40</td>
<td>39</td>
</tr>
<tr>
<td>The personal wealth acquired through corrupt practices by officials is not confiscated</td>
<td>36</td>
<td>41</td>
</tr>
<tr>
<td>Those who commit corrupt actions are not punished</td>
<td>47</td>
<td>45</td>
</tr>
</tbody>
</table>
2.2 Activities undertaken

Throughout the project lifecycle, the following activities were successfully implemented:

2.2.1 Inception Phase

The activities of the Project Team during the inception phase focused on the implementation of activities 0.0.1 – 0.0.7 foreseen in the Workplan and included in particular the following:

A) Kick-off meeting;

b) Meetings and interaction with the Beneficiaries to review and confirm the relevance of the scope of work and workplan;
c) Team building / ice-breaking activities with the Beneficiaries;

d) Meetings with other projects to identify synergy opportunities and avoid effort duplication;

e) Meetings with CSO representatives to enlarge the Team’s understanding of the transparency, accountability and integrity landscape and seek cooperation opportunities;

f) Restructuring of the logframe and review of the overall workplan;

g) Review of the risk assessment;

h) Review of the stakeholders’ analysis;

Re: a)

The kick-off meeting was organised on Day 1 of the Project, 11 November 2019 in the premises of the EUD in Skopje. Participants included the representatives of the EUD/Contracting Authority, the two Beneficiary Institutions – SCPC and CRPFAPI, the Contractor and the Project Team (Key Experts).

The Beneficiaries briefly presented their needs and underlined high hopes in the Project and its results. The Contractor and Project Team outlined their approach to the management based on agility, participation/inclusion and quality and underlined high commitment to produce the expected results to high quality standards. The EUD outlined the policy and programmatic context in which the Project will operate and emphasised the high quality that they expected.

All Participants agreed that the project should be managed in the most flexible way possible to be able to react to changing circumstances and needs. They also agreed that it would be premature to start visibility activities at that stage. This is why the provision of the TOR: “With a view to enhance awareness about and ensuring commitment to the project, the contractor is encouraged to organise a kick-off event involving the beneficiaries, the ministries and state administrative bodies concerned, and other relevant stakeholders following the EU visibility guidelines” was not followed during the inception phase. A right moment will be found, in consultation with the CA and Beneficiaries, to organise such an event, possibly back-to-back with the first SC meeting.
Re: b)

With regards to SCPC, two major meetings were held: on 21.11.2019. with the entire Commission and on 29.11.2019. with the contact person, where the scope of work and planning outline were discussed. Apart from this a series of ad-hoc meetings were held on a nearly daily basis to discuss specific issues and questions. This helped achieve common understanding of the Project and facilitated the restructuring of the logical framework.

With regards to CPRFAPI/APRFAPI, meetings were held on 28 November with the contact person, and on 3 and 10 December with the president and contact person, where the scope of work and planning outline were discussed. A number of ad-hoc meetings with the president and relevant CPRFAPI/APRFAPI staff members were held on a nearly daily basis to discuss specific issues and questions. This helped the restructuring of the logical framework based on the needs and specifics.

An all-day workshop with both Beneficiaries was held on 11 December 2019 to discuss and agree on the final shape on the logframe and the time plan. The aim was to make sure that nothing from the original TOR was omitted and that current needs are well addressed. All Beneficiaries’ comments regarding the scope of work and timing were taken on board.

Re: c)

This included:

- a meeting with the entire Commission (SCPC) on 13 November 2019 where the Project was discussed in a rather informal atmosphere giving opportunity to exchange views on various subjects and get to know each other better;

- a concours for a flashy/catchy name/acronym of the Project was launched by the TL. Team members and Beneficiaries’ staff, including SCPC Members were very keen to participate and over 20 proposals were made. Finally, the name ProTRACCO (Promotion of TRAnsparency and ACCOuntability) was selected by clear majority of participants (although without a democratic vote, which was difficult to arrange).

This appeared to be a very good icebreaking and team-building exercise which also helped reveal some potential communication issues and scopes for misunderstanding which might become problematic if only detected at a later stage and concerning a serious rather than a light issue.

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2 At the time of the meeting and throughout the inception phase the beneficiary was CPRFAPI although it was clear it would be transformed into APRFAPI any time soon. The Agency become operational with the election of its director in the end of December. The new name is applied across this report.
A discussion concerning the possibility of organising a joint event to celebrate the International Anti-Corruption Day and the International Day of Human Rights (9 and 10 December 2019 respectively) had the same effect and provided some lessons to streamline the communication in the future. Although the idea was finally abandoned due mainly to insufficient time for preparation, the agenda that was prepared and the title “Integrity and Human Rights: an undeniable link?”, linking anti-corruption and free access to information can be used for the start-up event.

Re: d)

The following meetings were held:

**USAID NMSI Project.** A very fruitful meeting. Conclusions were that The two projects have a lot of points of intersection where potential overlapping might occur. To alleviate this risk, regular consultations were identified as necessary until the end of NMSI project in mid-2020. These points of intersection concern mainly the IT activities. Some of ProTRACCO activities build on NMSI deliverables, such as the functional analysis (NMSI) to be followed by systematisation/internal organisation rulebook (ProTRACCO). The same goes for NACS\(^3\), which is being prepared by NMSI while its implementation monitoring is to be supported by ProTRACCO. On the other hand, one of the expected deliverables of NMSI, namely the register, has not been produced, so the activities involving the register had to be modified. NMSI has also dealt with internal communication and individual communication skills of the SCPS staff and is planning to deal with outside communication as well – which is the area of ProTRACCO’s Outcome 3. This confirmed the need of ongoing communication and coordination between projects.

**Council of Europe.** A lot of subjects of common interest with the EU-funded Economic Crime Project of the CoE, although no direct overlap. CoE has a lot of experience in promoting financial investigations which use the same analytical techniques and tools that may be useful for SCPC when checking assets declarations and looking at the financing of political parties. CoE’s experience, and pool of experts, will be useful in the course of activities on corruption risk assessment. Close cooperation and coordination will be beneficial and will be maintained.

**State reorganisation project** (CPM, EU-funded). It was clarified that this project will not deal with functional analysis for individual institution, but rather at horizontal government level. Therefore, there is no overlap regarding the functional analysis of APRFAPI and systematisation of SCPC. However, coordination and information exchange are necessary to

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\(^3\) National Anti-Corruption Strategy
ensure consistency of action. Discretionary powers are related to anti-corruption risk assessment; hence coordination will be ensured.

**OSCE.** A lot of issues of common interest, although no clear intersection or overlap. There is a potential of joining efforts on some activities (workshops, training) but ideas are only to be explored. Hence, keep each other informed of planned activities.

**Re: e)**

The following meetings were held:

**Transparency Macedonia.** Two meetings with three representatives. First meeting was more fact-finding about anticorruption landscape and a discussion helping understand the political environment in the country. The second one focused on activities and intersections. There is a great potential of cooperation with TM on the following issues:

- Surveys: they have good experience and know-how in running such surveys so those foreseen within our Project could be done jointly or in close cooperation with TM;
- TM monitors activities of SCPC so their experience can be very useful in defining indicators for some outputs of the Project and for the NACS.
- Communication and awareness raising – again, huge cooperation potential.

**Re: f)**

Review and common understanding of the LF (logic of intervention) was one of the main focuses during the inception period and involved a great deal of analysis, conceptual thinking and consultations with the beneficiaries. Indicators were reformulated together with stakeholder, in a participatory and inclusive process.

**Re: g)**

Risk register has been established and the risks have been updated. The register will be reviewed and updated in regular intervals and whenever necessary in a participatory process. Its analysis will be present to the Steering Committee. During the Inception phase, time was identified as an important risk given the number of activities as well as the budget (man-days) available for IT activities. High mobilisation and reactivity of all stakeholders is important to mitigate the former. Very careful planning and selection of solutions will be key to mitigate the latter. Selection of MISA tools instead of development from scratch would also mitigate this risk.
Re: h)

Stakeholders analysis has been reviewed and updated. Stakeholders register has been established and was a subject to reviews and updates.

2.2.2 Component 1 - Support to the State Commission for Prevention of Corruption in ensuring transparency, integrity, and ethics in public institutions

Activity 1.1: Support to strengthening the capacities of the State Commission for Prevention of Corruption

The following sub-activities were successfully implemented under Activity 1.1:

1.1.1 Based on the functional analysis of the SCPC, support implementation of recommendations

- Delivering trainings to administrative staff of the SCPC’s Secretariat:

The capacity building activity for the SCPC was organised in September 2021. During a 3-day event, all employees and most of the members of the Commission learned and applied practical exercises in the following topics:

- Leadership and teamwork,
- Leading a team;
- Phases in building a team;
- Conflict resolution and conflict management;
- Communication;
- Projects and project management.

The training was interactive, with many practical exercises and simulations, enabling positive learning environment and supporting constructive dialogue between the participants.
Organisation of study visit to a member state of the EU (1 visit, approximately 5 days, for approximately 8 persons):

The project team organised a study visit to ANAC Italy from 04 to 08 July 2022.

SCPC merged the two study visits planned under the project (this, with the study visit on whistle blowers protection), and proposed a list of 7 representatives to attend the study visit – 7 elected members of the Commission and 4 staff members.

During the study visit, the representatives got acquainted with:

- Italian National Anticorruption Authority (ANAC)
  - The system of corruption prevention and transparency in Italy
  - Preventive measures and tools for the creation and affirmation of integrity in public institutions (conflict of interest, incompatibilities, codes of conduct)
  - Whistleblowing
  - Focus on public contracts: regulatory and supervisory powers of the National Anticorruption Authority
- Monitoring on Public Procurement and the BDNCP (National Database on Public Procurement Contracts)
- Guardia di Finanza (Italian Financial Policy)
  - General presentation of Guardia di Finanza in Italy
  - The functions and the organization of Guardia di Finanza
- CONSIP S.p.A.
  - General presentation of Consip
  - Activities and results
  - The E-procurement Platform
  - The purchasing and negotiation tools available to public administrations

4 Source: https://dksk.mk/en/
− DNA National Direction AntiMafia
  o The presentation of the DNA
  o The activities of the DNA
− Dipartimento della Funzione Pubblica (Ministry of Public Administration)
  o The organization of the Italian public administration
  o DFP's role in integrity and transparency
  o The contents of the 5NAP and the Italian government's committee
− SNA Scuola Nazionale dell’Amministrazione (Italian National School of public administration)
  o The presentation of the Italian National School of public administration
  o The activities of the Italian National School of public administration
− Corte dei Conti
  o General presentation of Corte dei Conti in Italy
  o The functions and the organization of the Corte dei conti

1.1.2 Development and promotion of IT solution for interconnection with institutions and municipalities needed for preventing corruption

Under Task 1.1.2. the Community portal was developed as a tool to enable SCPC to communicate with all institutions. The portal allows for SCPC to communicate on different topics (areas of interest) with different representatives from the institutions. The tool enables communication with stakeholders using announcements, surveys and meetings.

The system also is used as a hub for user management for other tools.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Postgresql database server of SCPC.

All source code of the tool is the owned by SCPC.
1.1.3 Establishment of an IT solution for measuring the performance, transparency and accountability of SCPC, based on the monitoring matrix

- Development of IT solution for measurement of performance, transparency and accountability of SCPC

Under Task 1.1.3 the Performance Monitoring System (PMS) has been established. The tool has been established based on the monitoring matrix developed as a catalogue of activities and tasks performed. The data has been organized in a structured manner, enabling for easier analysis using BI tools.

The implementation of the Performance Measurement System for the purpose of measurement of performance, transparency and accountability of SCPC consists of the following steps:

- Identification of the catalogue of activities and tasks that are part of work activities of SCPC staff
- Creation of Monitoring matrix based on the catalogue
- Implementation of the system based on the monitoring matrix, connected with the DMS system and enabling data collection about the activities and tasks of SCPC staff
- BI tool for the analysis of the collected data

The catalogues was designed based on the needs for the report of the measurement of the performance, transparency and accountability. The methodology established was to collect the data about the work items based on the catalogue, using a software solution on a daily basis. The data collection tool enables this data to be verified by managers of units, as well allows the monitoring of currently assigned tasks and their progress. At the end, the data is analysed using BI tool.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Postgresql database server of SCPC. PowerBI is the tool used for data analysis and data visualization.

All source code of the tool is the owned by SCPC.

The main output of Task 1.1.3.a is PMS system with established monitoring matrix source code, as well as deployed PMS system, integrated with the BI tool.

- Delivery of specialised training to strengthen capacities for monitoring and analysis of the SCPC

Under Task 1.1.3.b the NKE has delivered specialized training to strengthen capacities for
monitoring and analysis of SCPC staff.

The training of SCPC staff from the analytics department has been conducted in a Face to face manner. Training was focused on several theoretic and practical topics, covering introduction to data analysis, using tools for data analysis and data manipulation such as Excel, usage of advanced Excel functionalities for data manipulation and visualization.

The main output of Task 1.1.3.b is F2F trainings to SCPC staff.

- **IT Module for case management**

Under Task 1.1.3.c. the IT Module for case management has been developed for the New system for managing Asset declaration and conflict of interests information at SCPC.

The case management module is an integrated module that allows the employees of SCPC with appropriate authorization to access the data collected using other modules of the system, such as public register of appointer/elected officials module, asset declaration module, data acquisition module and interoperability module.

Additionally it implements the Document Management System (DMS) based on Alfresco DMS system, that implements e-Arching solution as well.

The implementation of the case management module is finished and is deployed on the SCPC server infrastructure.

The Module for case management has been implemented using microservice architecture, having separate services for data transfer between different modules such as module for register of public officials, module for asset declaration and module for communication and management.

This module is the core module that integrates the data between the different services of the system as well as a control point for the cases and alerts. Additionally, this module also is integrated with the DMS system of SCPC for recording of generated submissions.

The IT tool has been developed as a web application consisting of a backend modules developed in Java Spring Boot and frontend system developed in ReactJS. The database is hosted on Microsoft SQL server database server of SCPC.

All source code of the tool is the owned by SCPC.

The main output of Task 1.1.3.c is the IT Module for case management source code, as well as the deployed system.
1.1.4 Development and deployment of several modules for asset declarations, declarations of conflict of interest

- Information collection module with all external web services and web forms

Under Task 1.1.4.a the information collection module has been developed and deployed on the infrastructure of SCPC. It has been developed based on a metamodel data model, that allows highly flexible data storage, and offers easy change of the data model of assets kept in the system. All assets and data gathered is flexible and can be further adapted if there is need for additional attributes.

The module is highly integrated with the case management system and acts as a gateway towards the interoperability platform. Additionally, this module has the possibility to gather data both from institutions that are not part of the interoperability platform using web forms.

The Module for information collection has been implemented using microservice architecture, having separate services for data transfer between different modules such as module for register of public officials, module for asset declaration and module for case management.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Microsoft SQL database server of SCPC.

For security reasons, this module communicates with the database that is accessible only from the internal systems of SCPC.

All source code of the tool is the owned by SCPC.

The main output of Task 1.1.4.a is the IT Module for information gathering source code, as well as the deployed system.

- Core processing module

Under Task 1.1.4.b the IT Core processing module has been developed. The data models for data exchange have been implemented, and this module serves as the main communication hub between microservices in the system. The functionalities of the core processing module include internal data exchange between system sub-modules and logging of data gathered by the system.

The Core processing module has been implemented using microservice architecture, having separate services for data transfer between different modules such as module for register of public officials, module for asset declaration and module for case management. It uses the RabbitMQ messaging system in its core, and enables persistent, secure and robust data exchange between microservices in the system.
The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Postgresql database server of SCPC.

All source code of the tool is owned by SCPC.

The main output of Task 1.1.4.a is the IT Core processing module source code, as well as the deployed system.

- **IT module for a register of public officials**

Under Task 1.1.4.c the Module for register of public officials has been developed. This module allows the institutions that appoint/elect public officials to maintain the register of public officials by adding new appointments and updating existing appointments (termination). The module is integrated with the DMS system through the core processing module, and uses digitally signed documents, allowing fully electronic processing of all submissions from the institutions.

This module is interconnected with the SCPC Community portal for the user management purposes, where all institutions have access and institution roles are maintained.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SCPC. The database is hosted on Microsoft SQL database server of SCPC. The database accessed by this system is separate from the internal SCPC database, and all communications with backend systems is implemented using services.

All source code of the tool is owned by SCPC.

The main output of Task 1.1.4.c is the IT Module for register of public officials software solution source code, as well as deployed system.

- **Asset declaration form module**

Under Task 1.1.4.d the Module for asset declaration form has been developed. The flexible data meta-model allows for SCPC to dynamically change the collected data models, that will make the system more maintainable and adaptable.

Asset declaration module is integrated with the system for Single Sign On from the e-Services portal from MISA, that according to the law for electronic services, allows for electronic identification of the end users and all data submitted is considered as submitted personally.
Additionally, the system is integrated with the DMS system of SCPC allowing for fully electronic submission and processing of the asset declaration forms.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Microsoft SQL database server of SCPC. The database accessed by this system is separate from the internal SCPC database, and all communications with backend systems is implemented using services.

All source code of the tool is the owned by SCPC.

The main output of Task 1.1.4.d is the IT Module for asset declaration software solution source code, as well as deployed system.

- **Conflict of interest declaration module**

Under Task 1.1.4.e IT Module for conflict of interest declaration has been developed. The flexible data model allows for SCPC to dynamically change the collected data, that will make the system more maintainable. This module is integrated with the asset declaration module, making it more user-friendly for the public officials.

Conflict of interest declaration module is integrated with the system for Single Sign On from the e-Services portal from MISA, that according to the law for electronic services, allows for electronic identification of the end users and all data submitted is considered as submitted personally.

Additionally, the system is integrated with the DMS system of SCPC allowing for fully electronic submission and processing of the conflict of interest forms.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Microsoft SQL database server of SCPC. The database accessed by this system is separate from the internal SCPC database, and all communications with backend systems is implemented using services.

All source code of the tool is the owned by SCPC.

The main output of Task 1.1.4.e is the IT Module for conflict of interest declaration software solution source code, as well as deployed system.

- **Communications and management module**
Under Task 1.1.4.f IT Module for communications and management has been developed. The module has been implemented as a sub-module of the case management module. This module allows for the management of the data models for the solution and allows for monitoring of all activities of the system.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Microsoft SQL database server of SCPC and accesses only the protected database server.

All source code of the tool is the owned by SCPC.

The main output of Task 1.1.4.f is the IT Module for communication and management software solution source code, as well as deployed system.

- **Web-publishing of assets declarations forms**

Under Task 1.1.4.g the IT Module for web publishing of asset declaration forms has been developed. This module allows public access to public information about the elected public officials, as well as the data from their asset declaration forms.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Microsoft SQL database server of SCPC. The database accessed by this system is separate from the internal SCPC database, and all communications with backend systems is implemented using services.

All source code of the tool is the owned by SCPC.

The main output of Task 1.1.4.g is the IT Module for web publishing of asset declaration forms software solution source code, as well as deployed system.
Activity 1.2: Support to development of Integrity Concept

The following sub-activities were successfully implemented under Activity 1.2:

1.2.1. Concept of Integrity drafted

- Preparation of a comparative analysis with other countries on integrity concepts

The scope of this sub-activity has been modified in the approved activity TOR to ensure both its feasibility and pertinence/relevance. For practical reasons (difficulties in accessing the information from official sources during COVID pandemic) this sub activity was no longer the starting point of the integrity concept shaping. A full-fledged comparative analysis on MK legislation with those of the three selected countries (FR, LT and SL) would be very resource consuming while bringing no real added value in practical terms. Instead, systems of the three countries have been analysed and results of this analysis used in drafting the integrity concept. The role of this international review is only auxiliary, and it is meant to serve as source of inspiration for the authorities of North Macedonia in addressing gaps in its integrity system, fine-tuning it and designing any possible changes that may be envisaged in the future.

The international review focus is on public integrity, in connection to which political and private integrity elements were also analysed. The document presents a general overview of good and bad practices of national efforts to promote integrity with a focus on pragmatic solutions based on legal regulations. Elements and characteristics that clearly stand out of others are highlighted. It was based on the experts’ experience, desk research and interviews with respective country experts and representatives of institutions. It presents practical solutions on integrity concept and integrity elements which were identified by the beneficiary and need to be further developed or improved.

A review of laws, policies and existing analysis constitutes the main data source for the assessment. To collect information on good and bad practices, a key informant interviews were also conducted with knowledgeable persons from the anti-corruption focal point, public sector, civil society and academia. A questionnaire was prepared for that purpose with leading questions to get the insight of integrity concept state of play.

Source: [https://dksk.mk/wp-content/uploads/2021/02/Pro-TRACCO-%D0%9A%D0%BE%D0%B0%D1%86%D0%B5%D0%BF%D1%82-%D0%B7%D0%B0-%D0%BD%D0%BD%1%82-%D0%BD%D0%BD%1%82-%D0%BD%D0%B3%1%82-%D0%BD%1%82-%D0%BD%1%82.pdf](https://dksk.mk/wp-content/uploads/2021/02/Pro-TRACCO-%D0%9A%D0%BE%D0%B0%D1%86%D0%B5%D0%BF%D1%82-%D0%B7%D0%B0-%D0%BD%D0%BD%1%82-%D0%BD%D0%BD%1%82-%D0%BD%D0%B3%1%82-%D0%BD%1%82-%D0%BD%1%82.pdf)
**Conduct analysis on the legislation that regulates the integrity and ethics**

The scope of the analysis was delimited in the Inception Report of the NKE-team and based on the outline of the integrity concept discussed and agreed upon with the SCPC. The respective legislation applicable at central level was identified through the mapping exercise (see below) and analysed from the point of view of the completeness of the integrity landscape. For each integrity element the following factors were analysed:

- existence of regulatory act(s);
- clarity of the obligations and duties of employers and employees;
- existence/clear definition of an institution in charge of monitoring/control;
- existence of sanctions for violations and
- existence/clear definition of institution(s) in charge of imposing sanctions.

This analysis is part of the report on Integrity Concept, which is the main deliverable under activity 1.2.

**Preparation of the list of laws that directly or indirectly regulates the integrity and ethics**

The mere preparation of a list of laws would produce no added value, as public authorities know the legislation relevant to their sphere of activities. This is why the Project Team proceeded with the legislation mapping which identified not only the legal acts but also mapped the factors above and their legal bases. The mapping matrix resulting from this exercise made the analysis possible and allows quick identification of gaps.

**Recommendations for drafting concept of integrity**

In the course of the analysis the NKE-team and the KE1/TL concluded that – instead of the recommendation for the drafting of integrity concept – it will be more reasonable to prepare a draft integrity concept with recommendations for its possible further development. The concept has been produced and presented to the SCPC for further discussion at the Integrity Working Group. The NKEs involved in the activity and the KE1/TL are ready join the meeting of the WG online to provide further clarifications, answer questions and moderate the discussion. The proposed model, if adopted, can easily be rolled-out into sectors and to the local level using the mapping matrix approach. The conclusion is that the integrity landscape with regards to public administration is well developed and permits growing the integrity culture. The identified gaps relate mainly to political integrity and private sector integrity at its intersection with public integrity.

The authors recommend using the Integrity Concept to develop a National Integrity Strategy divided into sectors and/or to develop separate sectoral integrity strategies (i.e. for bigger sectors – public, political, private, or for smaller sectors – healthcare, law enforcement, sports etc.). The
Concept should be used to design the sectoral integrity assessment by the SCPC (based on questionnaires). It can further be used to research the integrity levels and issues through surveys and polls – for example using the questionnaires prepared by the KE1/TL and modifying them as relevant.

1.2.2. **Develop a methodology for monitoring the implementation of integrity concept**

This activity was implemented as part of a block of connected activities comprising 1.2.2; 1.2.5 and 1.2.6 for which one team of non-keys experts has been hired. These activities built on the deliverables produced under 1.2.1 and 1.2.4 with the aim of facilitating their practical implementation and effective monitoring.

- **International workshop for exchange of experiences and knowledge for monitoring the implementation of the integrity in the institutions**

During the second reporting period the planned workshop was replaced, and instead, the two international non-key experts provided the necessary inputs reflecting the international experience and practice with regards to integrity monitoring and integrity training. While doing so, they also considered the International Review produced under activity 1.2.1 (which was much wider and not specifically focused on monitoring) and refer to experience of other countries than the three reviewed from the perspective of its potential utility for North Macedonia.

- **Draft the methodology for monitoring the implementation of the integrity concept**

The final draft of the methodology for monitoring of the Integrity concept was send for approval to the SCPC on 16 November 2021, and was approved on 26 November 2021. The Methodology serves as basis for an ICT solution that will give access to all public institutions to a standardised questionnaire. The questionnaire will gather data that will give overview of the implementation of the integrity system. Based on this data, an evidence-based recommendations and solutions will be offered by the SCPC to enhance the implementation of the integrity system among the public administration. The questionnaire will be responded by the institutions in regular intervals (annually), and will enable comparative data.

1.2.3. **Develop a software solution for gathering data related to the implementation of the integrity concept**

- **Development of the IT solution (web application) for gathering, monitoring and analysing the data from the institutions related to the level of implementation of the integrity concept**

Under Task 1.2.3.a the software solution for gathering data related to the implementation of the integrity concept has been developed. This software solution has been integrated as part of the Community portal, being a tool that other Institutions need to access and use.
Based on the methodology for monitoring of the level of implementation of the Integrity concept, the tool enables the implementation of the monitoring by implementing survey, specific for its needs. The survey enables the targeted institutions to fill in self-evaluation data, that will classify the level of implementation of the integrity concept. Additionally, the tool makes random selection of institutions based on several criteria, enabling SCPC to make evaluation of the self-evaluation data to produce additional report and recommendation.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Postgresql database server of SCPC.

All source code of the tool is the owned by SCPC.

The main output of Task 1.2.3.a is the Software solution for gathering data related to the implementation of the integrity concept integrated as part of the Community portal software solution source code, as well as deployed solution.

- **Delivery of the trainings for data collection and use of the web application**

Under Task 1.2.3.b the trainings for the software solution have been delivered to institutions. The trainings have been delivered using the Zoom platform.

The main output of Task 1.2.3.b the training for the Software solution for gathering data related to the implementation of the integrity concept integrated as part of the Community portal.

1.2.4. **Develop anti-corruption risk assessment framework**

- **Up-date of the methodology (especially the process of identification of all risks)**

The issue of corruption risk assessment (CRA) has been on the agenda of public institutions and international assistance project for over a decade now – the Law on Public Internal Financial Control (LPIFC) was adopted in 2009 (with amendment in 2011 and 2013). Overall Risk Management Guidelines based on this law were adopted in 2015 (assisted by the Netherlands and updated in 2017); and Addendum to the guidelines and relating specifically to corruption and fraud risk was produced in 2016 under a twinning project; an explanatory note on CRA and an sample methodology on CRA were produced under an IPA project in 2018 and, finally, a CRA for the purposes of strategic planning was prepared by a Macedonian expert in 2019 and tested. Meanwhile experts’ reports were produced under TAIEX in 2018 and IPA in 2018, assessing the CRA system and a number of training activities were delivered under various projects. However, no real progress was made and no systemic CRA was applied in North Macedonia – the underlying reasons being the perceived
complexity of these documents, lack of understanding of the notion of a corruption risk and lack of training in practical application.

This is why the ambition and indeed a clear objective was to close the issue of CRA methodologies in North Macedonia so that the future TA projects will not have to address it again – with the exceptions of additional training and capacity building.

This is why international expert was hired to address the issue. During the kick-off meeting the SCPC clarified that the main task should be to produce a sectorial CRA as this was a direct competence of the SCPC, while the institutional CRA (under the auspices of MoF and LPIFC) should not be neglected either. In the Inception Report, the expert overviewed the existing documents and concluded that with regard to the institutional CRA (LPIFC) the Guidelines on 2015/17 and the CRA guidelines of 2016 were fully in line with international standards and practices and could in principle be applied. At a sectorial level no comprehensive methodology existed although the 2019 CRA methodology for strategic planning was quite proper and could be used within a limited scope.

From this moment on, in coordination with the SCPC as key beneficiary, the effort focused on two directions:

a) Support in the implementation of the Institutional CRA, and
b) Development of a comprehensive sectorial integrity and corruption risk assessment methodology (SICRA)

Re a): the expert who produced the guideline handbook back in 2016 was hired to supplement his previous work by:

- provide even more detailed, step-by step guidelines based on the handbook and MoF guidelines along with explanatory notes and methodological guidance;
- provide online training to SCPC staff on the logic of the methodology and principles of its application;
- provide on-the-job training trough consultations with staff members responsible for the self-assessment;
- present to the SCPC staff and management summarizing the experience from the self-assessment and recommendations for its future development

The expert produced a comprehensive methodological framework based – on one hand – on the legislation of North Macedonia and the approved Integrity Concept and – on the other hand – on international experience, practices and trends. It needs to be stressed that the focus was on producing a flexible, versatile and relatively simple tool (although simple corruption
risk assessment methods do not really exist) which would be compatible with the OECD approach and the international internal control and audit standards and with the methodologies produced so far in North Macedonia. In the assessment of the KE1/TL this has been achieved and the document produced is of high quality – this assessment was further confirmed by very positive feedback from some international and local experts to whom the document was presented.

The proposed methodology – as a whole or its modules – can be used for other purposes than sectorial CRA – for example for overall integrity monitoring and for the monitoring of the implementation of the national anti-corruption strategy.

Understanding that the SCPC potentially may have insufficient capacities to fully implement the methodology at this moment, the project Expert team hired for implementation of the activities 1.2.2, 1.2.6 and 1.6.2 will offer a plan for gradual implementation of the SICRA, that should facilitate and mainstream the document in the organisational practices. Future efforts should be focused on creating and developing the capacities rather than investing more and more in methodologies – the experience since 2015 shows that are no simple methodologies. Also, it is important to note that the SCPC does not have to implement the methodology itself or on its own: SICRA can be presented as on overall, comprehensive and consistent tool to be used by researchers, NGO and international donors. So far everyone is using its own – some time ad hoc – methodology so the results of different studies and research are not necessarily compatible. Finally, international project can assist the process – through experts and/or through provision of IT tools.

As part of this sub-activity, the NKE / Component 1 leader prepared a video presentation that will be made available through the SCPC web-site to the public institutions. The presentation is translated in both, Macedonian and Albanian.

Additionally, as part of this sub-activity a guidance for implementation of the SICRA methodology was prepared, and the SICRA methodology itself was simplified, in order to make it more comprehensive and easy to use. The SICRA methodology was approved and is published on the SCPC web-site.

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● **Draft Guidelines with corruption, conflict of interests and other indicators, prepare clear and user-friendly samples and forms (with as much examples, forms, practical information as possible)**

This was done through the Guidelines for the Implementation of Institutional Corruption Risk Assessment produced by the NKE and adopted by the SCPC and through expert’s comments to the internal documents of the SCPC in which the expert explained how risks should be understood and identified.

● **Upgrade the SCPC capacity through workshops/trainings**

Online training has been provided to the SCPC on the Guidelines for the Implementation of Institutional Corruption Risk Assessment and on the SICRA methodology. Both training events received very positive feedback form participants as evidence by the evaluation forms.

1.2.5. **Elements of the integrity concept drafted**

As mentioned under 1.2.2 above, this activity is being implemented as part of a block of connected activities comprising 1.2.2; 1.2.5 and 1.2.6 for which one team of non-keys experts has been hired.

● **Draft and adopting tailored code of ethics, the work procedures, guidelines, manuals for effective implementation of the integrity concept**

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**FIGURE 4: GUIDELINES FOR USE OF OFFICIAL VEHICLES FOR BUSINESS TRIPS**

**FIGURE 5: RULEBOOK FOR HANDLING GIFTS IN THE PUBLIC SECTOR**

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A team of NKEs was working on preparation of tailored code of ethics, working procedures, guidelines, manuals and other supporting documents for implementation of the integrity concept. As part of this activity the following documents have been delivered and approved:

- Integrity guide,
- Code of ethics, and
- Rulebook for using state-owned vehicles.
- Rulebook for conflict of interest, and
- Rulebook for handling gifts.

All these are integrated in the Manual for Integrity officers.

Activity 1.3: Support to Implementation of the Law on whistle-blowers protection.

The following sub-activities were successfully implemented under Activity 1.3:

1.3.1. **Conduct a survey of the public opinion and understanding for the system of the whistleblowing in general (before and after the implementation of the strategy)**

The second round of the survey was finished in February 2022 after the implementation of the integrity campaign. The survey was conducted by telephone, using the CATI method, on a random sample of 1,000 respondents. The margin of error is ± 3.08%, with a confidence level of 95%. The data was collected starting from 27th December 2021, until 13th January 2022. All eight statistical regions (NUTS 3) were covered, taking into account the distribution of urban and rural settlements. The random sampling method ensures representativeness of the sample by gender, age, ethnicity and other demographic variables. A comparative study to the initial survey was prepared and the summary of results was presented in front of the SCPC representatives by the Component 1 leader, Jure Shkrbec.

At the very beginning, the respondents were asked on their opinion regarding their impression on the amount of information that organizations in the country keep secret. More than two-fifths (43.4%) believe that too much information is kept secret. A quarter of the respondents (25.3%) think that information is kept secret as much as necessary, while almost a quarter (23.2%) think that not enough information is kept...
secret. Compared to the baseline research, it can be noticed that there is no significant change in the perception regarding the attitudes of the citizens that not enough information is kept secret.

The details of the research are presented in the summary report titled “Quantitative research on citizens’ perceptions and attitudes on whistleblowers”.

1.3.2. Prepare a strategy on promotion of the positive context of whistle blowers protection and implement a training needs analysis fully

A strategy for promotion of the positive context of whistleblowers, was prepared by an earlier TA project, i.e. the document was produced under IPA “Strengthening the national capacities for fight against organized crimes and corruption” in February 2018. In order to facilitate and support the implementation of this document, the project team suggested that an action plan should be developed that will formulate the essential elements of the strategy such as the messages that should be sent and the addressees of the campaign (general public; employees, employers, public or private sector; all of them?).

Therefore, a holistic approach to integrity surveys and campaigns has been adopted treating various campaigns within the Project (Activities 1.3; 1.4 and 2.1) as parts of a wider campaign promoting integrity within society and public administration.

The Communication Strategy suggested that the Integrity campaign should be organised in three pillars:

1st pillar refers to campaign’s activities that cover both beneficiaries State Commission for Prevention of Corruption and Agency for Protection of the Right to Free Access to Public Information;

2nd pillar covers the activities for the State Commission for Prevention of Corruption;

3rd pillar covers the activities for the Agency for Protection of the Right to Free Access to Public Information.
1.3.3. Support to strengthen the capacities of the 5 institutions with competences for protected external whistle blowers reporting (institutions to be selected after analysis on the most relevant ones for whistle blower protection)

- **Delivery of trainings according to the training needs analysis**

The training for target groups covered by the TNA and other than those referred to by 1.3.3 below – i.e. authorised persons in other public institutions and staff representatives of public institutions has been developed by the non-key experts.

The trainings were implemented in three cycles:

- The first cycle of trainings has been delivered online during the first half of July 2021. Apart from the 2 international experts, the SCPC representative took active part in preparation and the delivery of the training courses. With this, SCPC has been recognised as a centre of excellence with regards to whistle-blower protection in North Macedonia.

- The second round of the trainings on whistle blowers protection was delivered online in January and February 2022. As per the experience form the first round of trainings,
apart from the 2 international experts, the SCPC representative took active part in preparation and the delivery of the training courses.
- Training for head of institutions was organised in March 2022.

**Organization of the study visit for the representatives from the 5 institutions who directly work on the issue**

The scope of this sub-activity has been modified, and the activity was merged with A1.1. Instead of representative from the 5 selected institutions, the study visit was for expanded number of representatives from SCPC – the Secretariat and the Members of the Commission. Detailed description is provided above.
Installation of the IT solution for the protection of the whistle-blowers identity

The IT solution is developed and installed in the new Datacentre of SCPC.

The solution represents a Windows based application, that enables bidirectional communication between the SCPC and the whistle-blowers. The application is an easy-to-use solution, similar to a mail client, that will enable users to submit their cases and receive responses from SCPC. The application enables encryption and digital signature of all information communicated with SCPC, decryptable only by the person authorized to receive reports from the whistle-blowers.

The application is being adapted to be used in several institutions. This change will make SCPC as main communication hub for the application for all institutions. The MoUs have been signed with more than 7 institutions.

The application implemented also serves a second purpose, i.e. enabling a bidirectional communication with anonymous submission, protecting the reporter’s identity. These submissions will be received by the person authorised for anonymous reports and will enable SCPC to have active communication with the anonymous reporter, that will help SCPC build better cases if some information is not fully submitted by the anonymous reporter in the initial report.

Development and implementation of a web application for submission of information for a person authorized to receive reports from the whistle blowers training of the representatives for the use of the developed web application

After the initial design of the application, and the presentation of the whistle-blower’s protection IT solution, KE3 concluded that the application for both whistle-blower and person authorized to receive reports from SCPC will be Windows based applications. The web application is developed and serves as a communication hub for the other components. Additionally, it enables reporting for SCPC and all institutions whistle-blowers activities. The communication hub functionality will enable the secure, identity protected bi-directional communication, while keeping statistical information about whistle-blower cases.

The web application is deployed on the servers of SCPC. Operationalisation of the web-application with the other institutions is also finalised.
Activity 1.4: Support to develop and implement tailor-made anti-corruption campaigns.

The following sub-activities were successfully implemented under Activity 1.4:

1.4.1. Develop and implement tailor-made anti-corruption campaigns within the public administration, business community, state owned companies and civil society while raising the awareness of the importance of ethical conduct and integrity and of the available tools to prevent and report corruption and conflict of interest

- Develop promotional programme and communication plan

The Communication plan was prepared as part of a wider Integrity Campaign, which also covered activities 1.3.1 and 2.2.

The campaign strategy prepared consists of three pillars

**Pillar 1: The “umbrella” campaign on integrity**

**Beneficiaries:** SCPC, APRFAPI

**Specific goal:** Raising awareness of the importance of ethical conduct and integrity and of the available tools to prevent and report corruption and conflict of interest within the public administration and the role of citizens in building integrity climate including. Refraining from participation in corrupt, illegal and unethical activities and monitoring of public institution through requesting public information are among the tools the citizens can use.

**Pillar 2: Competences of the SCPC with main focus on whistleblower protection**

(connected with 1.3.2)

**Beneficiary:** SCPC

**Specific goal:** Promotion of the positive perception of whistleblowers. The campaign with built of the positive trend in perceiving whistleblowers over the last years and revealed in the public survey of September 2020. The campaign will link PR/awareness raising with education activities (e.g. e-learning courses) carried by the Project. The role of SCPC as the key institution preventing corruption and protecting the rights of whistleblowers as well as the centre of excellence on these issues within public administration will be put up front.

**Pillar 3: Competences of the APRFAPI**

**Beneficiary:** APRFAPI - free access to public information (connected with 2.1)

**Specific goal:** Raising awareness of the citizens of their constitutional and fundamental right to free access to public and encouraging them to use this right to monitor public administration and increase its transparency and accountability, this contributing to its
integrity. The role of APRFAPI as the key institution protecting the right to free access to public information as well as the centre of excellence in this regard within public administration will be highlighted.

Pillar 2, and in particular its part related to whistleblowing promotion is coordinated with the Regional Anti-corruption Initiative, who is also running a campaign on whistleblowing in the Western Balkans region.

As part of this task, also a public event to celebrate the International Anti-Corruption Day and promote the SCPC’s work on 9 December 2020, was organised.

![YouTube stream from the hybrid event on 09 December 2020](https://www.youtube.com/watch?v=O4LUFxLYezQ)

- **Conduct campaigns via social networks, radio, TV, and others, including preparation of advertising materials, social networks, official web sites and others**

The project campaign started in July 2021. The selected company followed the initially set plan for implementation of the campaign, while carefully adjusting to the needs and expectations of the beneficiaries. The careful approach enabled to design tailored and well-targeted products, visibility materials, and videos, that brought closer the work of the SCPC to the general and professional public, and raised the awareness on topics such as integrity of the public administration, whistle blowers protection, as well as to the right of free access to public information. The campaign was well lead, and gave the desired results.

Some of the products of the campaign are presented below:
Promoting Transparency and Accountability in Public Administration

All the materials and key visuals, including press conferences, public events, social events organised as part of the campaign can be found on the official SCPC web-site (www.scpc.mk).

- Conduct researches (before and after the campaign) for understanding of ethical conduct and integrity, availability of the tools for prevention and repression of corruption and conflict of interest

Two rounds of the survey were conducted, as per the project ToR – one before the initiation of the public campaign, and one after the end of the campaign, in January 2022. The

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9 Source: https://dksk.mk/wp-content/uploads/2021/12/DKSK-Infografik-2021-01-scaled.jpg

10 Source: https://dksk.mk/.

11 Ibid.
Some of the comparative findings from the two surveys on integrity are presented below:

**In your opinion, how effective are the current efforts of the following institutions in the fight against corruption?**

<table>
<thead>
<tr>
<th>Institution</th>
<th>Jan '22</th>
<th>Oct '20</th>
</tr>
</thead>
<tbody>
<tr>
<td>Courts of Justice</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Very ineffective</td>
<td>36</td>
<td>27</td>
</tr>
<tr>
<td>Ineffective</td>
<td>34</td>
<td>28</td>
</tr>
<tr>
<td>Neither ineffective nor effective</td>
<td>20</td>
<td>30</td>
</tr>
<tr>
<td>Effective</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>Highly effective</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Do not know</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Police</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Very ineffective</td>
<td>22</td>
<td>11</td>
</tr>
<tr>
<td>Ineffective</td>
<td>31</td>
<td>18</td>
</tr>
<tr>
<td>Neither ineffective nor effective</td>
<td>29</td>
<td>40</td>
</tr>
<tr>
<td>Effective</td>
<td>16</td>
<td>22</td>
</tr>
<tr>
<td>Highly effective</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Do not know</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Prosecutors' office</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Very ineffective</td>
<td>24</td>
<td>15</td>
</tr>
<tr>
<td>Ineffective</td>
<td>35</td>
<td>25</td>
</tr>
<tr>
<td>Neither ineffective nor effective</td>
<td>26</td>
<td>38</td>
</tr>
<tr>
<td>Effective</td>
<td>10</td>
<td>11</td>
</tr>
<tr>
<td>Highly effective</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Do not know</td>
<td>4</td>
<td>9</td>
</tr>
<tr>
<td>SCPC</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Very ineffective</td>
<td>22</td>
<td>17</td>
</tr>
<tr>
<td>Ineffective</td>
<td>30</td>
<td>24</td>
</tr>
<tr>
<td>Neither ineffective nor effective</td>
<td>30</td>
<td>35</td>
</tr>
<tr>
<td>Effective</td>
<td>13</td>
<td>15</td>
</tr>
<tr>
<td>Highly effective</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>Do not know</td>
<td>4</td>
<td>7</td>
</tr>
</tbody>
</table>

Citizens believe the most in the independence of the Police, while they believe the least in the independence of the Courts. The data show that an extremely small part of the citizens believes that any of the institutions is completely independent in its work.

About 8% of the citizens think that the Courts of Justice are completely independent, for about one third of the citizens (30%) they are somewhat independent, while over half (56%) of the citizens perceive the Courts of Justice as completely dependent in their work. Comparative answers to the same question from the research conducted in 2020, show a 14 percentage points increase in disappointed citizens who pointed out that the courts were completely dependent.

Only 6% of the citizens believe the Prosecutor’s office is completely independent in its work; 36% think it is somewhat independent, while 44% of the citizens think the Prosecutor’s Office is completely dependent in its work. In terms of all 4 institutions, the Prosecutor’s Office notes the lowest percentage of answers showing this institution works completely independent. In terms of the research conveyed in 2020, an increase of 12 percentage points is noticed in terms of the citizens who believe the Prosecutor’s Office is completely dependent.
The perception of the work of the SCPC is the least changed compared to the previous research conducted in 2020. Namely, only 7% of the citizens believe that it works completely independently, which is 4 percentage points lower compared to 2020, while 4 out of 10 citizens believe that the SCPC is relatively independent in its work. The same percentage of citizens (39%) believe that this institution is completely dependent in its work, a result 8 percentage points higher compared to the research conducted in 2020.

About 8% of the citizens believe the Police is completely independent, 38% consider it as relatively independent, while the operation of the Police is completely dependent for almost half of the interviewed citizens, which is an increase for 17 percentage points of the citizens who have changed their opinion compared to the research in 2020.

Chart 7 (Q4). In your opinion, to what extend are the following institutions independent?

<table>
<thead>
<tr>
<th>Institutions</th>
<th>jan '22</th>
<th>oct '20</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Courts of Justice</td>
<td>8</td>
<td>30</td>
<td>56</td>
</tr>
<tr>
<td></td>
<td>7</td>
<td>33</td>
<td>42</td>
</tr>
<tr>
<td></td>
<td>12</td>
<td>44</td>
<td>29</td>
</tr>
<tr>
<td>Police</td>
<td>8</td>
<td>38</td>
<td>46</td>
</tr>
<tr>
<td></td>
<td>12</td>
<td>44</td>
<td>29</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>38</td>
<td>32</td>
</tr>
<tr>
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<td>6</td>
<td>36</td>
<td>44</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>38</td>
<td>32</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>38</td>
<td>31</td>
</tr>
</tbody>
</table>

On a scale from 1 to 10, where 1 = the corruption presents a burning issue in North Macedonia, and 10 = the corruption does not present an issue in North Macedonia, the citizens provide an average grade of 2.2. The change of the average grade compared to the previous research conveyed in 202 is only 0.1.

1.4.2. Support to pilot IT/web/mobile applications aimed at raising citizens’ awareness on anti-corruption

The web/mobile application aimed for raising citizens’ awareness on anti-corruption has been developed. The web platform was developed as CMS system based on Wordpress, that makes it easy for SCPC to manage it, as it is the same platform as SCPC main portal. Based
on the web solution, the mobile application that has been developed as a cross platform application, supports both Android and iOS devices. Currently the application is only available on the Android platform.

The system enables SCPC to publish events and surveys, targeting all users. The mobile applications implements push notifications for new events.

The IT tool has been developed as a web application consisting of a Wordpress CMS system and a Mobile application, developed for the needs of SPCP. The database is hosted on Postgresql database server of SCPC.

All source code of the tool is the owned by SCPC.

Activity 1.5: Upgrade of the e-Learning platform and interconnection with the learning management system in the ministry of information society and administration

The following sub-activities were successfully implemented under Activity 1.5:

1.5.1. Upgrade of the existing e-learning platform with new modules, visual tools, spots, sounds, animation and option for certification

- **Analyse and upgrade the existing e-learning platform**

  The e-Learning platform based on Moodle LMS system has been upgraded to the latest version.

  The need to interconnect the Moodle of SCPC with the Moodle deployment at MISA has been implemented only as a link from SCPC e-Learning system towards the MISA system. All produced courses targeted towards Public Administration will be posted on the MISA system, and all public and business courses will be deployed on the SCPC system.

  The Moodle system that was deployed from past project has been restored from backup, and the procedure for its upgrade to the latest version has been performed.

  After the upgrade, new modules have been installed on the e-Learning platform, allowing for better visual representation of the courses, as well as enabling the possibility for production of certificates.

- **Establish interconnection of the e-learning platform with the learning management system of MISA**

  Since the Moodle deployment at MISA is a closed system, that is available to Public Administration, the SCPC Moodle installation will be used for public and business courses. All courses produced through the project, based on the appropriate target group, will be hosted on either SCPC or MISA e-Learning platform. SCPC e-Learning platform will have a
link towards the MISA e-Learning platform in order to direct public administration users to visit the MISA version of the courses.

- **Development of curricula and e-courses for integrity, whistleblowing protection, ethic, corruption and conflict of interest with adequate methodological approach for different types of listeners**

The following e-learning courses are developed and deployed through the SCPC learning platform:

- E-learning for general public on integrity concept (all topics combined)
- E-learning for public administration / integrity officers, covering the following topics: ethics, corruption, and conflict of interest.
- E-learning for public administration / authorised persons for whistle blowers protection.

1.5.2. **Promotion of the e-learning platform among public administration, business entities and the general public**

The e-learning platform was promoted at the closing conference of the Integrity campaign, as well as one of the project products promoted at the Closing project conference.

Activity 1.6: Support the adoption of the National Strategy for prevention and repression of corruption and conflict of interests

The following sub-activities were successfully implemented under Activity 1.6.:

1.6.1. **Conduct qualitative and quantitative researches on the effect of the implementation of the state program for prevention and repression of corruption and conflict of interest 2016-2019**

The whole activity WAS cancelled as the new National Strategy for prevention and repression of corruption and conflict of interests was adopted on 18 April 2021, due to Covid-19, the delayed Parliamentary elections and the establishment of the Government.

1.6.2. **Conduct deep qualitative perceptive and victimology researches of the most vulnerable sectors in the specific area**

The team of experts was engaged to produce the following deliverables:

- Methodology for integrity assessment of the vulnerable sectors (Index of Integrity), and
• Qualitative analysis of the vulnerable sectors defined with the National Strategy for prevention and repression of corruption.

The Integrity Index was prepared in July 2021. The tool enables measuring of the progress towards upgrade of the integrity standards and practices, in areas that are considered particularly vulnerable, i.e.: health, education, environment, agriculture, and public enterprises. The tool will be used for regular data gathering and progress assessment in the most vulnerable sectors. The Integrity index considers good international practices, the National Strategy for prevention of corruption and conflict of interest, and as well as other tools and documents that were earlier developed with the project, such as the integrity concept.

1.6.3. Based on the new National Strategy drafted and adopted (new principles and roles)

The qualitative analysis was finalised and delivered in January 2022. Based on the data gathered from the qualitative analysis, a need for (evidence-based) improvement of the National Strategy for Prevention and Repression of Corruption has been identified, that would enhance the overall feasibility of the Strategy, and thus result with greater impact to the society. Namely, some of the stakeholders, during the interviews, explained that there is slow or no progress with some activities under the specific sectors, defined with the Strategy, since these activities are no longer feasible, and need to be amended and / or replaced with other.

Additionally, the SCPC team responsible for monitoring of the implementation of the National Strategy needs further support and on-the-job mentorship to enhance their skills to follow / assess the implementation of the National strategy, coupled with data-gathering templates and reports, which they will be able to implement in the process.

A NKE was selected to strengthen the capacities of the SCPC team responsible for monitoring of the implementation of the National Strategy for prevention and repression of corruption, as well as to develop tools (system) for monitoring and implementation of the Strategy, that will compatible to web-based solution for collecting data, monitoring, evaluation and quality check of the implementation of the National Strategy. The expert facilitated sector-specific workshops to discuss the new National Strategy, problems and challenges faced during the first year of implementation, and helped to define recommendation for further (evidence-based) improvement of the National Strategy. The expert was available and worked together with the SCPC to enhance their skills and knowhow in collecting data, monitoring, evaluation, quality check for the implementation of the National Strategy, and development of evidence-based recommendations for upgrade of the strategy. Templates (methodology and report formats) for collecting the data, monitoring, evaluation and quality check of the implementation of the National Strategy
were prepared and shared with SCPC. A round table with high government officials was organised to present them the key findings and recommendations.

**Figure 14: Photo from the video streaming of the SCPC meeting with high government representatives**

1.6.4. **Development and installation of a web application for the new national strategy**

The Web application for the new national strategy has been developed as part of the Community portal.

The National Strategy data collection system definition has been based on the established new process of report gathering, reflecting monitoring of the implementation of the strategy. The new system enables easy to follow and easy to analyse the collected data. The workflow of statuses enabled tracing all reports submitted by institutions appropriately. Developing the tool as integral part of the Community portal will promote the Community portal as one stop shop of SCPC for the institutions. The tool enables for continuous evaluation of the implementation, as well as generation of the yearly report.

The IT tool has been developed as a web application consisting of a backend (Java Spring Boot) and frontend system (ReactJS), developed for the needs of SPCP. The database is hosted on Postgresql database server of SCPC.

All source code of the tool is the owned by SCPC.
Activity 1.7: IT support to the anticorruption proofing of the legislation

This activity was not initially foreseen with the ToR, but were implemented on SCPC’s request, and cover the following:

1.7.1. Development and deployment of an application for Annotation Proofing of Legislation

The KE3 has finished the development of the tool for the Annotation Proofing of Legislation (APL). The tool allows SCPC to collaboratively annotate laws based on the APL principles. The proofed texts will be the base of building a proofing database, that can further be the base for developing a machine learning plugin for automated proofing of legislation.

The tool has been deployed on SCPC servers and all staff has been trained.

Further development of this tool is envisioned by integration with the e-Government system to allow SCPC to automatically receive the laws as soon as they enter the government procedures.

2.2.3 Component 2 - Support to the Commission for the Protection of the Free Access to Public Information

Activity 2.1.: Upgrade the capacity and competences of the Commission for Protection of the Right to Free Access to Public Information

The following sub-activities were successfully implemented under Activity 2.1.:

2.1.1. Support to preparation of policy making regulations, following the new law on free access to public information, including analysis of the definition of classified information and transposition of the European legislation on the re-use of public sector information

- Support in drafting on the implementing legislation to the law on free access to public information

In February 2000 after the entry into force of the newly adopted law in December 2019 and the establishment of the Agency for the Protection of Free Access to Public Information the bylaws for the implementation of the law had to be drafted (Упатство за начинот на спроведување на овој закон – Guidelines on the manner of implementation of the Law on Free Access to Public Information). This is a document with significance for both, the regulation of access to information and its restrictions, and for the proper implementation of the law and APRFAPI is obliged to adopt it under Art.34, para.1, subpar 6 of the 2019 law on access to public information. The process was held with the active participation of APRFAPI legal officers and closely consulted with KE2. Comments and recommendations were
prepared on the draft of the bylaws (Upatsvo), and concrete proposals for a better formulation of provisions. As a result the Upatsvo was improved and published in State Gazette in March 2000.

In March 2020 KE2 discussed with APRFAPI and commented on its request on the list of information holders and in particular on the issue, whether media and NGOs are subject to the Law on Free Access to Public Information as information holders. The work on issues related to information holders continued remotely in April-May 2020.

In summer 2021 the APRFAPI officers drafted a Delegation Guide addressed to the officials in information holders’ organizations. The document was consulted and discussed with KE2, who provided written recommendations. The document was finalized in line with the proposed content.

A leaflet for citizens was prepared by KE2 in August 2021. The content was discussed within the Agency, finalized and published on the APRFAPI website (https://aspi.mk/wp-content/uploads/2021/09/Леток-за-баратели-1.pdf). The leaflet is entitled “You have the Right to Know!” designed for awareness of citizens about their right to access public

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information and after being finalized it was promoted at the Right to Know Day, 28th of September.

Two debates with information holders and information seekers respectively were held in July 2022, where problems arising in the process of the access law implementation were identified and discussed. On this basis the NKE Dance Danilovska Bajdevska made analysis with recommendations. The report was presented on a Conference held on 28 September 2022 on the occasion of the Right to Know Day.

- **Prepare draft recommendations guidelines and methodology for monitoring, supervision of information holders**

In the period May – July 2021 a methodology for monitoring of the information holders have been drafted and developed. The methodology was elaborated in close coordination and discussion of the NKE Gergana Jouleva, an international expert with indebt and long experience on the matter. The methodology is based on elaborated principles formulated based on international standards, best practices and experience. The methodology also underlines recommendations for improved pro-active transparency of public bodies.

As enclosures to the methodology, lists of categories of information appropriate to be monitored for different groups of information holders were identified in discussions with APRFAPI officers, developed and annexed to the methodology (overall 7 annexes).

The methodology was used for the monitoring of the Agency in late 2021. Closely related to the methodology are two other documents prepared under the project.

- **Assist in drafting misdemeanour measures and provisions for managers of public institutions, both for silence of administration and for failing to provide the requested information**

13Misdemeanour proceedings were closely monitored by KE2 in 2021 and analysis and recommendations were prepared to improve the operational work. During this activity and of the misdemeanour processing conducted by the APRFAPI it was identified that potential legislative gaps are to be further explored and analysed. The Project Team mobilized a NKE Dance Danilovska - Bajdevska who prepared analysis of the misdemeanour related provisions of the access to

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13 Source: https://aspi.mk

**FIGURE 16: 28 SEPTEMBER 2022 - RIGHT TO KNOW DAY - DISCUSSION ON THE LAW ON ASPI**
Promoting Transparency and Accountability in Public Administration

information law as part of her overall analysis of the implementation of the law. The problems with the implementation of these specific provisions were discussed in July 2022 and the report with recommendations covered misdemeanour provisions as well. The report was presented on the Conference held on 28 September 2022 on the Right to Know Day.

- **Harm test on the application of the provisions on classified information, analysis on the definition and use of classified information provisions performed.**

A number of meetings were conducted with key stakeholders (specialized public bodies & NGOs) in the period November 2019 - March 2020. The roles and functions of the Directorate on Personal Data Protection and the Directorate on Protection of Classified information as well as the relevant legal framework, practice and current status were identified and discussed at a number of meetings with them and the APRFAPI.

Additional clarity on the regulation of the restrictions and the balance with access to information was achieved in a workshop on 17 February 2020 where the provisions of the new Law on Free Access to Public Information were discussed between APRFAPI staff and participants in the working group who drafted the new law. In 2020-2021 KE2 collected and analysed information from APRFAPI archives on the cases decided by them and on cases decided by the Administrative court in previous years. KE2 discussed this practice with APRFAPI legal officers including in the course of work on concrete cases and preparation of documents on them and positions to the court and also provided consultancy and advice. This experience underlined the analysis and the findings of concrete guidelines on how to conduct the harm test.

The first version of a document presenting an analysis of the exemptions and harm test was prepared and presented in February 2021 and subsequently several times discussed with the Beneficiary and amended.

Guidance how to conduct “harm test” addressed to information holders was elaborated and discussed with the Agency staff in the period June – September 2021. The document was designed in a way departing from the initial approach taken in the first draft in February 2021.

In August 2021 KE2 presented Guidelines on the application of harm test based on the analysis of the exemptions as stated in the laws and applied in practice. It was largely discussed with the APRFAPI staff and adjusted in line with the comments and needs.

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14 Source: aspi.mk
This document was finalized and published by the Agency before the Right to Know Day, 28th of September 2021 as part of the documents promoted on the occasion. It was published at: https://aspi.mk/wp-content/uploads/2021/09/Прирачник-за-спроведување-на-Тест-на-штетност.pdf

The Guide on the harm test was based on a thorough analysis of the national legislation related to exemptions vis-à-vis the relevant international standards.

- **Transposed European legislation on the re-use of public sector information**

A compliance analysis report was prepared by the relevant NKE in relation to the consistence of national legislation on the re-use of public information with the EU legislative framework. The analysis of the transposition showing discrepancies was accompanied with recommendations. It was presented to the relevant APRFAPI staff members in the period January – April 2022 and finalized after receiving a feedback. The analysis served as directions and instructions for the APRFAPI members of the working group under MISA for a longer term.

In September 2022 the NKE provided comments to the newly prepared version of the draft law on open data. The comments and recommendations were discussed with APRFAPI relevant officers in a number of meetings and with the involved law-drafter on an online meeting in the beginning of October 2022.

2.1.2. **Support and strengthen internal operational and institutional capacity of the APRFAPI**

- **Assessment of APRFAPI capacities (operational and institutional) – perform functional analysis aligned to the methodology for functional analysis applied in the state administration**

During the inception period it was found that a Functional analysis has been performed for the CPRFAPI in 2017 with the assistance of OSCE, but it was not in line with the new legislation.

Two NKEs were mobilized to work on the APRFAPI functional analysis and systematization starting on March 2020. The work was showed down by the lock-down and subsequent anti COVID-19 pandemic measures taken by the Republic of North Macedonia and the European lock-down.

A methodology was developed for the Functional analysis and discussed with the Beneficiary. All the relevant documents were collected related to the APRFAPI functioning. A questionnaire was prepared and consulted with the Beneficiary. The questionnaire was filled in by the civil servants working in APRFAPI and sent back to the experts’ team for
analysis. The activity was done in close coordination and discussion with the Beneficiary, in particular the Director and the focal point.

Several versions of the documents were prepared and largely discussed within the APRFAPI in the period April – June 2021.

The Functional analysis and the Systematisation & Rulebook were finalized and submitted to MISA. The documents were officially approved and became operational in August 2021.

- **Re-evaluation and suggestions for improvement (ISO)**

  During the Inception period it was agreed to restrict this activity to assistance in the preparation of documents in order to meet ISO requirements. In the period June – September 2021 KE2 supported the APRFAPI officer responsible for the review, re-evaluation and improvement of the internal standards within the Agency related to ISO. Suggestions for improvement were made by KE2 and directly implemented in the text of the internal regulations in cooperation with the relevant officer. In particular, regulations and procedures related to the appeals and other submissions, trainings of information holders and requesters, cooperation with information holders and misdemeanours were covered, analysed and improved in line with the legislative framework, including the new Law on free access to public information and the international standards.

- **Draft recommendations for introduction of new organisational part that will be responsible for performing misdemeanour procedures. Ensure that there is no overlap in the competences of such section with any other unit/department/institution**

  Recommendations for design of the new organizational part were included in the Functional analysis and reflected in the Systematization document. With that respect part of the Functional analysis report focused on the new unit involved in the performance of misdemeanour procedures.

- **Strengthen the APRFAPI capacities for the implementation of the new law, develop and prepare training for the APRFAPI staff members**

  Constant feedback was provided by KE2 for the training teams conducting trainings to information holders on the proper application of the Law on free access to public information and the international standards. Online trainings were provided by the APRFAPI to information holders regularly on a weekly basis. Needs for focused attention and interpretation of certain legal provisions and complicated issues were identified in parallel with the feedback on training skills, applied curricula and training materials, including presentations.
A three-day event was organized and handled in Ohrid in November 2021. The majority of the APRFAPI staff participated and the training was provided by the two selected NKEs. The feedback and evaluation of the trainers made by the participants verifies the high level of professionalism and the quality of the implemented task.

A three-day training skills ToT was organized and handled by a NKE in February 2022. The feedback from the event was high qualified.

- Train APRFAPI’s staff members at the separate unit on monitoring, supervision and issuance of misdemeanour sanctions

Based on monitoring and analysis of the APRFAPI work on misdemeanours conducted by officers within the system of information holders, KE2 provided a report with recommendations in November 2021. The APRFAPI work on misdemeanours in 2021 was quite intensive. The relevant Misdemeanour commission has worked on about 330 individual cases meeting different challenges at different level and phases of the proceedings. The process was followed by KE2 for months and periodical discussions with the relevant officer/s were held. In June – August 2022 the analysis was improved based on new information coming from the progress of the proceedings and on the feedback received from the responsible members of the misdemeanour commission. The findings and recommendations were sent to the commission members and personal meetings with them were held. After comments provided by them and by the Agency Director the document was finalized.

In July 2022 APRFAPI staff members took part in the discussion on the implementation of the part of the access to information law related to misdemeanour provisions of the law, analysing problems and potential solutions in the course of these proceedings.

- Provide on the spot assistance in performing inspections

The ToR was apparently drafted before the draft new law was adopted. In fact, there is no inspection power of APRFAPI. However, APRFAPI decided to become more involved in monitoring of proactive publication of information under Art.10 the law, although it was not envisaged within its responsibilities. A key tool to do periodic monitoring was the methodology elaborated under the Project. Monitoring of a number of public bodies in summer and autumn 2021 was performed in close consultation by KE2 on the use of methodology, handbook and monitoring approach and technics.
Promoting Transparency and Accountability in Public Administration

- **Study visit to EU member state that has best practices in imposing sanctions in regards to free access to public information (app. 5 days for app. 5 staff)**

The strict COVID-19 measures prevented the progress under this sub-activity for a long time. Contact has been made with the European Court of Human Rights, where clear response was given that trip events to the Court are cancelled for unspecified time due to the pandemic.

The European ombudsman staff responded positively and an online two-days event was organized in the beginning of April 2022. The webinar triggered a lot of interest by the APRFAPI staff, which participated fully in it. The feedback from the event was excellent.

After exploring two other options the Beneficiary and Project Team focused on a study visit in Lisbon, Portugal, which was organised in the period 17-21 October 2022. APRFAPI had meetings with CADA - the national access to information supervising authority, the Parliament, the Data Protection authority, Transparency International – Portugal, Body on State Secrets etc.

![Study Visit to Portugal; APRFAPI and CADA representatives](image)

- **Support & conduct monitoring of at least 20 institutions (information holders)**

Originally the activity was intended to be part of the training for inspectors. In fact, the 2019 Law on free access to public information does not provide for inspections on information holders’ performance of their legal obligations, or for an inspection function as part of the APRFAPI competencies. As far as “monitoring” is concerned, the one the Agency is doing is on the performance of the information holders’ duty to pro-actively publish information. The
function is not explicitly entrusted to the Agency, but derives from its general power to oversee the implementation of the law. Three surveys were made in 2020, each of which concerned a different group of information holders: municipalities, state-owned and municipal companies and central executive bodies. The APRFAPI unit responsible for the monitoring was consulting with KE2 the ongoing work and the methodology applied for proactive publication and policies, as developed by NKE Gergana Jouleva.

In November 2021 KE2 prepared a Methodology for implementation of APRFAPI monitoring in cooperation with the relevant officers and based on the already developed monitoring tools and concrete issues coming from the monitoring in practice. The document was discussed within the Agency and finalized after comments and proposed amendments provided by the Agency Director.

- **Train APRFAPI staff on using the web-platform for reviewing appeals, review annual reports sent by the information holders, and preparing the draft APRFAPI annual report**

The ICT team, supported (and supervised) by KE3, had organised and delivered training for APRFAPI representatives on how to use the web-platform for review of appeals and review of the annual reports provided by the information holders. This information and knowhow are to be applied for preparation of the annual reports.

2.1.3. **Support APRFAPI IT capacities for implementation of the legislation on free access to public information**

- **Develop and implementation of web-based software solutions, document management system, record keeping of cases and electronic archive**

Under Task 2.1.3.a the Document management system (DMS), record keeping of cases and electronic archive has been developed. The Document management system was developed as an integrated system based on opensource Alfresco DMS system. As a core functionality of the DMS system is the electronic archive, that enables easy and well organized record keeping.

The IT tool has been developed as a web application consisting of a backend (Alfresco DMS) and frontend system (Angular), developed for the needs of APRFAPI. The database is hosted on Postgresql database server and is deployed on the servers of APRFAPI.

All source code of the tool is the owned by APRFAPI.
• **Technical/IT assessment and analysis of the current IT infrastructure**

Under Task 2.1.3.b the KE and NKE analysed the exiting IT infrastructure at APRFAPI premises, and generated a report about the needs of the Agency.

The NKE has provided the final specification of the IT equipment in the project.

The IT tool has been developed as a web application consisting of a backend (Alfresco DMS) and frontend system (Angular), developed for the needs of APRFAPI. The database is hosted on Postgresql database server and is deployed on the servers of APRFAPI.

All source code of the tool is the owned by APRFAPI.

• **Create a web-based software solution as an on-line tool for filing complaints and establishing a methodology for the mechanisms for legal protection**

Under Task 2.1.3.c the software solution for on-line tool for filling complaints and access to public information has been deployed. The activity is implemented as an extension of the Alaveteli platform, so the information requesters will be able to submit complaints, in an electronic form, once the requestor is not satisfied with the information holder reply. This complaint is delivered in the Alaveteli platform towards the Agency administrator. Training on the usage of the online tool for free access to public information and filing complaints has been conducted.

The IT tool has been developed as a web application consisting of the Alavateli platform and an extension of the Alaveteli platform. The database is hosted on Postgresql database server and is deployed on the servers of APRFAPI.

All source code of the tool is the owned by APRFAPI.

• **Upgrade the existing web site, following a prior needs assessment**

Under Task 2.1.3.d the Public web site of APRFAPI (www.aspi.mk) has been developed. The new web site has been developed using the latest Wordpress CMS system, enabling easier, more secure and better organized public web site.

The Wordpress system has been extended with a plugin that enables automatic update of the data from the Community portal regarding the most up to date information about Information holders.

The web site is multilingual and that is supported by one of the best multilingual Wordpress plugins.
The IT tool has been developed as a web application consisting of a Wordpress CMS as well as plugin for Wordress for Information holders. The database is hosted on Mysql database server and is deployed on the rented servers of APRFAPI on their Internet service provider.

All source code of the tool is the owned by APRFAPI.

- **Upgrade of the existing web site with a new section - coordination spot with the general public requesters**

Under Task 2.1.3.e the Alaveteli platform was customized and deployed. The platform allows easy and standardized electronic free access to public information, that has been used by most countries. The platform was customized to be synchronized with the Community portal information about Information holders, allowing for automatic update of this information.

The IT tool has been developed as a web application consisting of the customized Allaveteli platform. The database is hosted on Postgresql database server and is deployed on the servers of APRFAPI.

All source code of the tool is the owned by APRFAPI.

- **Upgrade the existing APRFAPI web site with a section for online coordination that will facilitate networking among information holder’s officers and APRFAPI staff dealing with cases/requests**

Under Task 2.1.3.f the APRFAPI community portal implementation has been developed. The community portal supports more engaged information sharing with the information holders and embed all other community (information holder institutions) tools developed during the course of this project, such as annual report gathering and analysis tool and information check tool. The community portal is built on technologies allowing easy integration of all tools targeted towards information holders, making it an APRFAPI’s one-stop-shop for information holders.

The self-evaluation of information holders has been implemented as well as the evaluation the results by the Agency.

The training of the institutions have been delivered to the Information holders.
2.1.4. Enhance APRFAPI capacities to prepare project application and improve international cooperation

In February 2022, APRFAPI staff were trained in Project Cycle Management (PCM), as well as in Methodology for training of trainers.

Through the PCM training, the participants enhanced their skills and knowledge in project design and management. The training provided the participants with an opportunity to learn about implementation of projects supported by various international donor organisations, as well as to learn from each other and exchange good practices and experience from project planning design, implementation, and monitoring.

Through the ToT, APRFAPI enhanced its internal pool of instructors/trainers who can present information effectively, respond effectively to questions and plan, organise and implement activities that reinforce learning.

Two tailored 3-day trainings were implemented, covering the following topics:

1. PCM:
   - IPA III and other funding opportunities;
   - Problem tree analysis, Objectives tree, Defining the scope of the project;
   - Logical framework matrix – practical work;
   - Elements of a project application;
   - Review of full project application;
   - Basic introduction to budget planning and preparation, and administrative/financial matters.

2. ToT:
   - Understanding and comparing different methods of training;
   - Basic principles and learning styles;
   - Training needs analysis - introduction;
   - Presentation of the process of training needs analysis;
   - Training design;
   - Creating and managing the working and learning environment during training;
   - Dealing with difficult situations.
Activity 2.2. Support and strengthen capacities of the public information holders and raise general awareness on the right to free access to public information

2.2.1. **Raising capacities of the information holders**

- **Develop of new training material for the APRFAPI for the information holders (new methods and materials for conducting training sessions with information holders).**

Due to the COVID-19 situation where close contacts and gathering of people were restricted in most of the time in 2020 – 2022, APRFAPI has developed online trainings conducted via Zoom. A lot of training sessions for information holders have been conducted. KE2 was observing and monitoring the training sessions and coming up with recommendations for improvement of the presentations. In October 2021 a two-day meeting was held with the participation of all lecturers and KE2 and the power point presentation was streamlined and modified. All the recommendations given by KE2 were reflected in the renewed presentation. The presentation was supplemented by a section relating to the pro-active publication obligations of information holders, following the KE2 advice. A new lecturer was involved in this part of the trainings to that end.

In addition, the ICT Team helped with development of training material.

- **Provide training to other information holders on the new law**

In April 2021 an online TAIEX webinar training was held with the participation of a number of different groups of information holders. KE2 participated in his capacity of PROTRACCO Project expert in the training and held a preliminary preparatory meeting with the lecturers from Slovenia and Croatia to ensure the training content will meet the real training needs. Then KE2 took part in the training as a lecturer and in the formulation of recommendations for the APRFAPI provided by the TAIEX training team.

In May and June 2022 a number of trainings were conducted by APRFAPI Team with the support of NKE German Filkov. Five regional trainings were conducted in Veles, Prilep, Strumica, Tetovo and Skopje, where different groups of information holders were involved. In June 2022 also a training event was held for information holders from the judiciary.

In 2021 KE2 went in contact with IRI and facilitated a meeting with APRFAPI Director and Focal point. Trainings for political parties as new information holders obliged under the law were planned, organized and conducted (under IRI project). The content of the questionnaire distributed to political parties to that end was shared and discussed with KE2 by IRI, so he provided input.
• **Train trainers from APRFAPI staff to conduct training**

APRFAPI has developed a training programme for delivering online trainings in the circumstances of COVID-19 to information holders using Zoom. The trainings are conducted on a regular weekly basis by two teams each of which consists of two trainers (officers with legal profile). The teams rotate in their trainings. In the period October 2020 – September 2022 KE2 observed and monitored a number of these trainings, and made a review and analysis and provided feedback and recommendations in relation to the content of the training materials, curriculum and manner of presentation, lecturing and moderating. After each of the concrete trainings was handled the analysis and recommendations of KE2 were shared and discussed in life work meetings in the Agency.

In October 2021 a meeting was organized in the Agency for two days where the presentation used for the trainings was discussed by the trainers, the other officers involved and KE2. A number of recommendations were made and the presentation used for the training of information officers was updated and improved, while many suggestions and content proposed by KE2 were included. This on-the-job mentorship was ongoing throughout a large period of the project implementation.

A three-day training skills a Training of trainers was organized and handled by a NKE in February 2022. The feedback from the event was high qualified.

• **Prepare and publish a guide for distribution to both information officers & officials**

It was agreed between the APRFAPI management and the Project team to develop a compilation of guides to be used for education and training. As already explained in the previous report, the Project team prepared or supported and finalized the following materials:

- Guide on delegation (recommendations provided by KE2, finalised by the Agency officer/s);
Other materials produced within the Project and used for and within the trainings for information holders and published on the Agency website are the Standards & methodology on Pro-active publication of information, published at: https://aspi.mk/wp-content/uploads/2021/09/Проактивно-објавување-на-информацији-Прирачник.pdf

- Develop training curriculum and a training package (training and information, e.g. brochures) for promoting the right to free access to public information for both information holder officers and information holder officials; Organise at least 5 trainings for the public servants in different sectors

The Project Team planned and organized in May 2022 five training sessions in Veles, Prilep, Strumica, Tetovo and Skopje and the one for judiciary in Skopje, with the support and input of NKE German Filkov. The spots were selected in close cooperation with the Beneficiary, based on the needs. People that participated were enthusiastic and in all sessions shared different problems.

The NKE contributed with the organization and input to training curriculum. The presentation used by APRFAPI trainers was the one elaborated in line with the Project recommendations and input.

A training package is designed consisting of the handbooks & guidelines elaborated under the Project. The power point presentation contains several references to the documents published on the APRFAPI website. Trainers also actively refer the audience to use these documents.

The NKE participated in the five trainings also with his presentation focusing on the importance of the access to information from public interest point of view was enjoyed and inspired discussions.

- Conduct an assessments of methods and tools for communication with information holders;

The methods and tools for communication of APRFAPI with information holders were subject to assessment by both the ICT team and KE2. Regular communication is in place with regards to the submission of annual reports. Formal communication under a strict procedure is conducted with regards to complaints against information denials. Random communication is conducted with regards to trainings as well as with regards to misdemeanour procedures and proactive publication monitoring. Based on the assessment, e-communication of APRFAPI with information holders was developed by the ICT team.
Provide additional training on free access to information to law enforcement and judiciary

A training event for the law enforcement and judiciary was organized and held in June 2022 with the support and assistance of NKE German Filkov.

Analyse the role, challenges, obligations (under the law) and training needs of information holders officers and officials in the public sector through interviews. Prepare a report with recommendations.

APRFAPI has developed a training programme for delivering online trainings in the circumstances of COVID-19 to information holders using Zoom. The trainings are conducted on a regular weekly basis by two teams each of which consists of two trainers (officers with legal profile). The teams rotate in their trainings. In the period October 2020 – April 2022 KE2 participated in a number of these trainings, and made a review and analysis and provided feedback and recommendations in relation to the content of the training materials, curriculum and manner of presentation, lecturing and moderating. After each of the concrete trainings was handled the analysis and recommendations of KE2 were shared and discussed in life work meetings in the Agency. The training needs have been identified all that time.

KE2 delivered a report with analysis and recommendations with regards to the APRFAPI online trainings for information officers. The report focuses on different aspects of efficient training and recommended improvement based on the identification of the real needs of the audience.

In April 2021 identification of training needs was conducted by KE2 with the aim to better formulate program and content of the online TAIEX webinar training up to the needs of information holders.

In October 2021 a meeting was organized in the Agency for two days where the presentation used for the trainings was discussed by the trainers, the other officers involved and KE2. Based on the identification of the training needs, a number of recommendations were made and the presentation used for the training of information officers was updated and improved, while many suggestions and content proposed by KE2 were included. This on-the-job mentorship will be ongoing throughout the project implementation period.

Prepare and publish a guide for distribution to both information holder officers and information holder officials. Promote the guides on one-day event.

It was agreed between the APRFAPI management and the Project team to develop a compilation of guides to be used for education and training. As already explained in the
previous report, the Project team prepared or supported and finalized the following materials:

- **Guide on delegation** (recommendations provided by KE2, finalised by the Agency officer/s);

**Promote the guides on one-day event**

The guides and all documents used for the trainings for information holders were presented and promoted in the two ceremonies for the Right to Know Day, 28 of September, in 2021 and 2022. A public event with the participation of media was conducted in 2021 and a conference with the participation of the media, public administration, NGOs and experts was organized in 2022. The training documents produced under the Project were presented and demonstrated by KE2 in his presentation during the conference.

Additionally the guides are presented as reference in the training presentation and published and easily available on the APRFAPI website.
● **Create online training materials**

The training for information holders was also designed and prepared as online training material, that will be easy to access through the web-site of APRFAPI.

![E-learning for APRFAPI](image)

**Figure 19: E-learning for APRFAPI**

**2.2.1. (2) Accountability of information holders increased by setting transparency standards at central and local level**

● **Develop a methodology for accountability of the state bodies following “harmful tests” principles. Prepare guide on the “harm test” implementation for information holders**

Accountability of information holders highly depends on the preparedness of information officers to apply properly the harm test. The test derives from international standards but can be applied domestically only if properly reflected in the law and well understood by the relevant officers. It enables them to practically apply the exemptions in a narrow manner, thus ensuring that transparency and accountability dominate as a principle. The methodology is developed and explained in the guide, prepared by KE2 on the basis of international standards. The Guidelines were discussed, based on the relevant international standards and experience from the work and trainings for information holders provided within APRFAPI. These factors were all taken into account and reflected in the final version of the document.

The Guidelines were published before the Right to Know Day 2021 and are promoted and used in the next trainings.

● **Set up transparency standards and develop and implement a comprehensive system of accountability of the state bodies – information holders**

The transparency standards were drafted and developed by the NKE Gergana Jouleva in cooperation with the APRFAPI unit responsible for the monitoring of the information
holders’ websites publication of information. The elaborated Methodology was based on international standards and research of local reality and included analysis and recommendations. Examples from advanced national approaches were given.

The document was finalized and published at the APRFAPI website.

- **Develop and implement standards and formal rules for pro-active transparency at central and local level**

Based on the Methodology, Guidelines for pro-active transparency was developed. The document presents standards and directions to information holders to publish information in line with the law and to develop a culture of transparency. The document was elaborated in close cooperation with the relevant ARFAPI unit and published on the Agency website. It is also used and promoted in the APRFAPI trainings to information holders.

- **Prepare guide on the “harm test” implementation for information holders**

The guide of the harm test was based on the analysis conducted in February 2021 and discussions with the APRFAPI staff in the period March – August 2021.

In August 2021 KE2 presented the Guidelines on the application of harm test based on the analysis of the exemptions as stated in the laws and applied in practice. It was largely discussed with the APRFAPI staff and adjusted in line with the comments and needs. This document was finalized and published by the Agency before the Right to Know Day, 28th of September 2021 as part of the documents promoted on the occasion. It was published at: https://aspi.mk/wp-content/uploads/2021/09/Прирачник-за-спроведување-на-Тест-на-штетност.pdf

The Guide on the harm test was based on a thorough analysis of the national legislation related to exemptions vis-à-vis the relevant international standards.

2.2.2. **Support the Open Government Partnership (OGP) activities, and develop activities for the APRFAPI with relation to OGP**

- **Evaluate the OGP activities taken by the APRFAPI, provide recommendations for improving pro-activity, and define an index for monitoring pro-activity publication of public information on the information holders’ web locations**

In January, April and September 2022 the mobilized NKE reviewed the relevant documents related to OGP and met with the relevant APRFAPI officers to discuss the status quo and
assess the progress. KE2 had participated in most OGP events related to the development of the new Action plan for the next OGP period.

A meeting was conducted with the involved APRFAPI staff, NKE and KE2 to discuss the OGP activities of APRFAPI and perspectives. A document with recommendation for enhancing the pro-active transparency by the information holders has been prepared.

- **Provide recommendations for improving pro-activity**

Recommendations for improving pro-activity were included in the methodology for pro-active publication. Clear instructions for officials are also contained in the specific document Directions for pro-active publication of information for officials.


- **Define an index for monitoring pro-activity publication of public information on the information holders’ web locations**

The index was first defined and developed in the appendixes 1 – 4 to the developed methodology presented in July 2021. Each of those develops specific questionnaires based on the specific profile and role of each of the different groups of information holders. The questionnaires contain the relevant questions that need to be answered by the ones who implement the duties to monitor proactive publication of public information. Differentiation is provided for the groups of central bodies and local ones. The questionnaires are an essential tool for the ones who perform the monitoring. According to the APRFAPI decision made in consultation with the NKE and KE2, self-monitoring and further monitoring by the Agency will be both applied.

In October – November 2021 KE2 prepared in cooperation with the responsible APRFAPI unit Directions for pro-active publication of information, addressed to public officials provided. The document is important and provides the necessary steps the researchers involved in monitoring proactivity should follow.

- **Conduct Public Awareness Campaign for the free access to public information**

- **Support the preparation of a communication plan related to the exercise of the right to free access to public information.**
Supplementary to the communication campaign with two components (Pillars) – one joint with the other Project component and one separate for the APRFAPI, the Project Team engaged in the preparation of a communication plan for APRFAPI related to the exercise of the right to free access to public information. The document was finalized in August 2022.

- **Conduct a public research perception and knowledge of their right to free access to public information, conduct a questionnaire on local and central level of a representative number of people, prepare a report and present it**

Two surveys were conducted with regards to this sub-activity. A public research perception was done in 2020 and another one in 2021 so that it was possible to compare the results and measure the progress made. The questions for the survey were identified and formulated after consultation and discussion between the Project Team and APRFAPI staff. The results of the perception measurement were referred to in several public events, including the January 2021 event of APRFAPI with young people audience.

- **Establish mechanisms that will strengthen the cooperation with local governments and CSOs to raise the public awareness on issues related to right for free access to public information. The contractor will assist the APRFAPI to identify measures for better implementation of the legislation for free access to public information at local level.**

The proactive publication at a local level is the best way for improvement of the situation. Stimulating best practices and good models of pro-active publication of information by local authorities is the closest path to both informing the public and raising public awareness on issues related to the right to access public information. OGP presents similar mechanism and is related to the task. Also, CSOs were present at the five regional training events focused on the access to information issues at a local level.

- **Create and produce at least 3 downloadable video animations on different topics targeting various audiences.**

This sub-activity was implemented under the communication campaign.
Design and implement a communication campaign for raising awareness of the general public on the right to free access to public information

As part of the integrity campaign (pillar 1 and pillar 3, described above). A part of the integrity campaign, lead under the slogan “You have the right to know”, a visibility and communication campaign for APRFAPI was developed and implemented.

The visibility materials generated with the campaign are available at the website of APRFAPI.

Activity 2.3: Support the implementation of the strategy for free access to public information 2018 – 2020, and develop a new strategy 2020 – 2024

2.3.1. Developing of the Strategy on Free Access to Public Information 2021-2025 and Action Plan

Developing of the Strategy on Free Access to Public Information 2021-2025 and Action Plan. Monitoring methodology

The draft APRFAPI Strategy and Action plan 2021-2025 were prepared after intensive debates and interviews with the participation of information holders, information seekers and specialized public bodies such as the Agency for Personal Data Protection and the one for the protection of classified information. These events were held in November 2020. The draft documents prepared by NKE were subject to numerous reviews and updates in the reported period.

After discussions and review were held, the document was finalized with the substantial input of the Project Manager in June 2021. The monitoring methodology was further developed and finalised in close cooperation with the Beneficiary who took a full ownership on the document.

The Strategy was promoted on 28 September 2021, at the international days on the right of free access to public information.

December, 2022
3 Contract Amendments during the Implementation of the Project

The project was awarded to PwC Lead consortium in the total value of 1,225,750 EUR and with the following distribution of working days, incidental expenditure and expenditure verification.

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During the course of project implementation, on 15th October 2021, the project team submitted the official request for approval of additional services on the project with most important changes being:

- Cost extension of the project for additional 612,250 EUR
- Project implementation time extension for additional 12 months (to 36 months total)

In addition to the above, project Team Leader/Key Expert 1 replacement was proposed (from Mr. Przemyslaw Musialkowski to Ms Londa Esadze).

This request was approved and consequently Addendum No. 1 to project Service Contract was signed on 29th October 2021 by EUD and 2nd November 2021 by the Contractor.
With addendum No. 1 to Service contract, overall project value was increased to 1,838,000 EUR and with the new distribution of working days, incidentals and expenditure verification:

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<td>PROVISION FOR EXPENDITURE VERIFICATION</td>
<td>7</td>
<td></td>
<td>22,500</td>
</tr>
<tr>
<td>MAXIMUM CONTRACT VALUE</td>
<td></td>
<td></td>
<td>1,838,000</td>
</tr>
</tbody>
</table>

Further, due to the cancellation of mission by the approved Team Leader/Key Expert 1 (Ms. Londa Esadze) and following the conclusions from Monthly Management meeting in November 2021, the project team requested approval of budget transfer within the budget lines not amending the objective nor scope of the project, neither the overall budget.

Remaining 86 working days of the Team Leader/Key Expert 1 were distributed to:

- Long-term subject-specific expert - the subject specific matters with regards to integrity, prevention of corruption, quality review of deliverables, and support in practical implementation and organisation of the project activities under Component 1, and
- Component 1 Leader who will be responsible for stakeholder management, coordination of the project for delivery of the project results, including reporting to the contracting authority and providing administrative and logistic support to the project activities.
These changes were approved by Administrative Order on 26th January 2022 and are reflected in the updated project budget with the new distribution of working days, incidentals and expenditure verification:

<table>
<thead>
<tr>
<th>Notes</th>
<th>Estimated number of working days</th>
<th>Fee rate [EUR] per working day</th>
<th>Amount [EUR]</th>
</tr>
</thead>
<tbody>
<tr>
<td>FEES (including overheads):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Key experts</td>
<td>2</td>
<td>304</td>
<td>900</td>
</tr>
<tr>
<td>Key Expert 1, Team Leader</td>
<td>2</td>
<td>230</td>
<td>825</td>
</tr>
<tr>
<td>Key Expert 2</td>
<td>2</td>
<td>240</td>
<td>825</td>
</tr>
<tr>
<td>Non key experts</td>
<td>3</td>
<td>1425</td>
<td>550</td>
</tr>
<tr>
<td>Senior Non-key experts</td>
<td>3</td>
<td>800</td>
<td>275</td>
</tr>
<tr>
<td>Total fees (including overheads)</td>
<td></td>
<td></td>
<td>1,665,100</td>
</tr>
<tr>
<td>PROVISION FOR INCIDENTAL EXPENDITURE:</td>
<td>5</td>
<td></td>
<td>150,400</td>
</tr>
<tr>
<td>PROVISION FOR EXPENDITURE VERIFICATION</td>
<td>7</td>
<td></td>
<td>22,500</td>
</tr>
<tr>
<td>MAXIMUM CONTRACT VALUE</td>
<td></td>
<td></td>
<td>1,838,000</td>
</tr>
</tbody>
</table>

And finally, in line with the status of project incidental expenditures, their necessity until the end of the project and needs of project Beneficiaries, on 26th September 2022, the project Team submitted 2nd request for approval of budget transfer within the budget lines not amending the objective nor scope of the project, neither the overall project budget, concretely:

- Transfer of remaining 45 Junior Non-Key Expert working days (from the initial project budget) with the value of 12.375 EUR to the Incidentals budget line to be used to support the remaining project activities until the end of the project
- 12 Senior Non-Key Expert working days (from Addendum No. 1) to be transferred to 8 additional days for Key Expert 2

These changes were approved by Administrative Order on 27th September 2022 and are reflected in the final project budget with the new distribution of working days, incidentals and expenditure verification:
MONITORING, REVIEW AND EVALUATION OF THE PROGRESS

The Project’s monitoring process was established during the kick-off period, in accordance to the standard EC procedures, and it was based on periodical progress assessments of delivery of project results and achievement of project objectives.

The monitoring and evaluation framework was defined through the timetable of activities, risks and assumptions, and Logical Matrix with its set of Objectively Verifiable Indicators (OVIs).

The established monitoring and evaluation mechanisms were performed on all project activities, both from the implementation perspective and the perspective of planned results and objectives. The Project team, together with the beneficiaries, established monitoring and evaluation at the very beginning of the Project implementation. The timeline of the project implementation, evaluation of the achievements and quality control of the delivered outputs were discussed at the operational meetings and monthly management meetings. The SC members reviewed the Project’s progress and quality of delivered outputs on each quarter through the duration of the project. Applying both monitoring and evaluation mechanisms enabled Project, when it was necessary, to take immediate actions to ensure successful implementation and delivery of the project objectives based on the targets.
The monitoring of implementation, and reporting on the specific activities, were carried out by the Project team; supervised by the PD nominated by the Contractor.

Periodic monitoring and review of the project achievements and its outputs were performed through Steering Committee Meetings, chaired by main Project beneficiaries. The meetings took place every six months, in order to provide for supervision and ensure smooth implementation of the Project.

The Steering Committee met in order to:

- assess Project’s progress and monitor all activities of the Project,
- guide the Contractor on all technical matters; and review and make comments on all reports, including technical and working papers submitted by the Contractor,
- assess the Contractor’s performance, approve the Inception, Interim and Final Reports, and other reports,
- jointly discuss any critical points, risks or bottlenecks in project implementation and to propose and discuss remedies in case of problems,
- guide the development and monitor the implementation of experts’ schedules and project work plans, and jointly take decisions on timing, costs and project contents,
- ensure close co-operation among the relevant ministries and institutions,
- closely coordinate with other EU projects related to this project, and with other relevant donor-funded projects, to promote synergies and integration,
- approve Project Interim Reports.

The Monthly and Interim Reports listed the undertaken activities in more detail; and assessed the progress toward achievement of project objectives. The updates stressed, in particular, the achieved results and identified potential risks during the implementation period.

There were five SC Meetings during the lifespan of the Project.
5 Project Management, Cross-Cutting Issues and Lessons Learnt

5.1 Project Management

The project managed to deliver all activities as planned with the Project ToR.

The table below summarizes the project management tools and their use:

<table>
<thead>
<tr>
<th>Project management tool</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>6 Steering Committee Meetings</strong></td>
<td>A project Steering Committee, comprised of representatives from the Delegation of the European Union, the beneficiary institutions, the Secretariat of European Affairs (SEA), the Ministry of Information Society and Administration (MISA), and the Ministry of justice (MJ) was established to supervise the project at highest level. Six SC meetings were organised during the project implementation period, of which 2 were with physical presence, and 4 were organised online, due to the Covid-19 restriction and protection measures. The SC provided strategic and technical guidance to the key experts and the project management team, assessed the progress of the project against the set timeline and project implementation plan, and discussed the critical points and risks for implementation of the project, and reviewed and made recommendations to the progress report, and the final report of the project.</td>
</tr>
<tr>
<td>Ad-hoc meetings, including on-line coordination, with institutions and other stakeholders</td>
<td>The key experts and the project management team have had more than 100 individual meetings with management / employees of the beneficiary institutions, representatives / project management of complementary projects implemented during the project implementation period, as well as meetings with representatives from the relevant stakeholder institutions and civil society sector, including but not limited to Ministry of interior, State Audit Office, Ministry of justice, SEA, and other.</td>
</tr>
</tbody>
</table>

The appointment of a Component 1 leader, and a Project leader in charge of administration and coordination of the project components facilitated the overall implementation of the project, and allowed more effective and efficient implementation of the project activities, thus compensating for the incurred project delay. The backstopping effort, the heavy
involvement of the NKEs, and practically daily coordination and cooperation with the project beneficiaries, followed by regular progress update and close cooperation with the Contracting Authority and the beneficiary institutions, enabled not to further increase the delay and delivery gap of the project, and bring to final phase of implementation and / or finalise significant portion of the project activities.

During this last reporting period all areas of improvement that were addressed and resolved during the previous period of the project, such as management of requests, adaptability to COVID-19 situation, TS processing, and overall risk management approach, proved to be of high importance for the overall effective and efficient management of the project.

All encountered risks, were well anticipated, and the mitigation strategies, coupled with the close coordination with the beneficiaries, helped the project team to easily navigate through this period.

Visibility - Project website is up and running, where the basic information about the project can be found, and where public content will be published. http://www.protracco-project.mk. The project’s deliverables are also placed on the Beneficiary Institutions’ website. The implementation of Communication Strategy also contributes to increasing the visibility of the project.

5.2 CROSS-CUTTING ISSUES

5.2.1 GOOD GOVERNANCE

Principles of good governance will be followed in the management of the project.

The main principles that are followed and applied by the project team are:

- **Participatory and inclusive** approach towards the relevant stakeholders, providing equal opportunities for participation of both women and men, as well as of people from different ethnicity and nationalities;
- **Accountable** – the project team and the consortium partners are accountable to all project counterparts who are affected by or have interest in the action. The Steering Committee, inter alia, serves as safeguarding mechanism to the accountability of the project;
- **Transparent** – Decisions and implementation of activities are being done as described with the Specific and General Contract Conditions, following the required laws and regulations. Information on the implemented activities, project progress and deliverables will be disseminated in accordance with the Communication and visibility rules, and will be available through the official
Internet site of the project;

- **Effective and efficient** – The project team aims at managing the project, so the ensure that project resources are used to produce results that are aligned to the project purpose, are relevant to the beneficiary needs, are aligned to the wide programme objectives and contribute to the public administration reform process;

- **Rule of law** – The project team follows the legal framework, respects the human rights, and has zero tolerance for corruption.

### 5.2.2 SUSTAINABLE DEVELOPMENT

Contributing to sustainable development of the beneficiary country is inherent in the Project objectives. Public administration reform, transparency and accountability are conducive to contributing to sustainable development on the beneficiary country. Increasing the integrity of the public institutions, by supporting them to be more transparent and accountable towards the citizens, supports a long-term development vision of the society. It is expected that on the long-run the project will contribute to improve the quality of life of the citizens, strengthen the democratic principles and the rule of law in the country, and by ultimately affecting the efficiency and effectiveness of the public sector, will improve the quality and availability of public services to the citizens, while also strengthening the value for money of the public services to the citizens.

Focus on building local capacities, participatory approach and other measures to ensure sustainability of the Project further contribute to this aim.

### 5.2.3 ENVIRONMENTAL PROTECTION

The Project Team is sensitive to lowering or minimising the negative impact to the environment. To do so, the Project Team takes due care use natural resources wisely (e.g. managing the environmental risks by optimising printing of project materials). A practical example of this would be a practice of sharing any documents mainly in electronic versions – printing being limited to the necessary minimum to satisfy the requests of the Beneficiaries. Simplification of timesheet procedure, proposed in this Report, would serve the same purpose – although the amount of paper involved is not huge, turning into electronic circulation would be symbolic of the Project’s sensitivity to environmental protection. Additionally, the digitalisation of the working practices in the beneficiary institutions also contributes to minimising the negative environmental impact from the work of the institutions.
5.2.4 GENDER EQUALITY

Although gender equality or mainstreaming is not directly addressed by the Project, the Team makes sure that well balanced representation of both women and men is sought among NKEs, training participants etc. Gender disaggregated data are collected during the implementation to facilitate monitoring and reporting. They will be gradually analysed and presented as of the next Progress Report. Additionally, the project team gives due consideration to the gender equality principles in all activities and deliverables of the project, thus to ensure grounds for equal participation and promotion of the rights of women and men. For example, gender specific data were collected during the public opinion surveys and analysed as relevant.

5.3 LESSONS LEARNT

The key lessons learnt from the Project are summarised below:

1. **Endorsement and distribution of projects’ deliverables.** It is important that the project beneficiary is actively involved in the design, delivery and review of the planned project deliverables. This ensures ownership over the project result, while also building the institutional capacities of the beneficiary institutions to independently undertake similar activities, and/or to mainstream and sustain the project deliverables within their regular course of work.

2. **Institutional capacity building.** The consultant is responsible to ensure development of the human capacities of the beneficiary institution (from methodological, technical and management aspects), while leading the development process, and offering solutions and proposals that will strengthen the capacities and are relevant to the needs of the beneficiary institutions.

3. **Software development, testing and deployment.** Even though the software development was successfully planned, coordinated/implemented and delivered, still the implementation of inter-related assignments that require strong team coordination, and are composed of inter-related and complementary tasks, could be implemented through a single company/subcontractor. What is positive, is that the Contracting Authority considered and acknowledged the combined experience of the teams proposed for implementation of the ICT activities.

5.4 CONCLUSIONS

The Project was successfully implemented as a result of the high mobilisation of the Project Team and other stakeholders, good team coordination and stakeholder management, close, efficient and effective communication and cooperation with the project beneficiaries and the Contracting Authority. Some activities started later than expected - mainly due to
organisational considerations – and some have taken longer to deliver, mainly due to
dialogues between the experts and the Beneficiaries aiming at meeting all the dynamic
expectations while ensuring maximum quality, as well as due to the Covid-19 outbreak.
However, all project activities were delivered as planned, and are approved as such by the
project beneficiaries.
ANNEXES

5.4.1 **Deliverables under Component 1:**

1. Document for Internal organisation of the SCPC;
2. Document for systematisation of the working positions of SCPC;
3. Concept of Integrity of North Macedonia;
4. Methodology for monitoring the implementation of the Integrity Concept;
5. Development of Comprehensive Sectorial Integrity and Corruption Risk-Assessment Methodology (SICRA);
6. Guidelines for Institutional Corruption Risk Assessment;
7. Trainings for implementation of the the Guidelines for the Implementation of Institutional Corruption Risk Assessment and on the SICRA methodology;
8. Integrity Guide;
9. Code of Ethics;
10. Rulebook for using state-owned vehicles;
11. Rulebook for conflict of interest;
12. Rulebook for handling gifts;
13. Guidelines for Integrity Officers;
14. TNA with public officials to assess the readiness for / level of implementation of the integrity concept;
15. Trainings (ToT) on Integrity, and training of selected institutions on Integrity;
16. Report on Implementation of Integrity Policy in the 5 pilot institutions;
17. Quantitative research on citizens’ perceptions and attitudes on whistleblowers;
18. Quantitative research on citizens’ perceptions and attitudes on integrity;
19. Strategy for organising and implementing the Integrity Campaign;
20. Training materials and cases for creating supportive environment for whistle blowers;
21. Integrity Index;
22. Qualitative research for effect of implementation of the new National Strategy, and defined evidence-based recommendations for upgrade / review of the National Strategy
ICT and e-format solutions (available only in electronic / web-based format) developed and deployed under component 1:

1. E-learnings on:
   a. Integrity,
   b. Ethics,
   c. Corruption,
   d. Conflict of interest, and
   e. Whistle blowers protection.

2. ICT tools and software solutions:
   a. Community portal
      i. Sub-system for communications and surveys
      ii. Sub-system for National strategy
      iii. Sub-system for gathering, monitoring and analysing the data related to the integrity concept
   b. Performance monitoring system
   c. Mobile/web application for raising citizens awareness on anti-corruption
   d. Whistle blowers protection software solution
   e. E-learning platform
   f. Anticorruption proofing of legislation
   g. Document management system with case management
   h. System for register of public officials and asset declaration and interests of public officials
      i. Sub-system for the register of public officials
      ii. Sub-system for the asset declaration and interests of public officials
      iii. Sub-system for the public register of public officials and asset declarations
      iv. Sub-system for processing/management/operational use of the register and asset declaration by SCPC
      v. Sub-system for data acquisition via Interoperability platform from institutions
      vi. Sub-system for data acquisition via Web forms from institutions without Interoperability
      vii. Sub-system for communication and notifications
5.4.2 **Deliverables under Component 2:**

1. Упутство за начинот на спроведување на овој закон – Guidelines on the manner of implementation of the Law on Free Access to Public Information;
2. Delegation Guide addressed to the officials in information holders’ organizations;
3. Leaflet for citizens;
4. Guidelines and methodology for monitoring and supervision of information holders;
5. Analysis of the implementation of the Law on free access to public information, and evidence-based recommendations for its improvement;
6. Guidelines on the application of harm test;
7. Compliance analysis report in relation to the consistence of national legislation on the re-use of public information with the EU legislative framework;
8. Functional analysis of APRFAPI;
9. Organisational act of the APRFAPI – Systematisation of the working positions of APRFAPI and Internal organisational structure of APRFAPI;
10. Training in project cycle management
11. Training of trainers
12. Training materials for information holders
13. Trainings for information holders on the implementation of the new Law
14. Guidelines on proactive publication;
15. Directions for pro-active publication of information for officials;
16. Standards & methodology on Pro-active publication of information;
17. Trainings for promoting the right of free access to public information;
18. Online training for information holders;
19. Development strategy of APRFAPI (2021-2025);
20. Communication and visibility plan of APRFAPI;
21. Specification of the IT equipment in the project
ICT and e-format solutions (available only in electronic/web-based format) developed and deployed under component 2:

1. E-learnings for information users;
2. Upgrade of the functionalities and contents of the APRFAPI web-site;
3. Web-platform for reviewing appeals, and review of annual reports sent by the information holders;
4. Software for document management system, record keeping of cases and electronic archive;
5. Web-based software solution as an on-line tool for filing complaints and establishing a methodology for the mechanisms for legal protection.