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Based on Article 34 of the Law on Free Access to Public Information ("Official Gazette of the Republic of North Macedonia" No. 101/2019), the Director of the Agency for protection of the right to free access to public information, on . .2023 adopted

ANNUAL PLAN FOR THE ASSESSMENT OF CORRUPTION RISKS FOR THE YEAR 2024

As a result of the efforts of the Government of the Republic of North Macedonia in the fight against corruption, and in accordance with the provisions of the Law on the Prevention of Corruption and Conflict of Interest and the National Strategy for the Prevention of Corruption 2021-2025 of the State Commission for the Prevention of Corruption, the Agency for protection of the right to free access to public information, adopted this Annual Plan for the Prevention of Corruption. The annual plan for the prevention of corruption aims to increase the institutional resistance to corruption and to establish a mechanism for control and prevention of the occurrence of corruption.

The Annual Plan provides a brief overview of the Agency's role in the fight against corruption, the Agency's profile and its competencies. Furthermore, the Plan contains identified risk areas susceptible to corruption within the scope of the Agency's operations, an Action Plan and its operationalization.

INTRODUCTION

Systematic building of a society based on transparency and openness of institutions is the most sustainable approach in the prevention and fight against corruption at the national level. The agency for the protection of the right to free access to public information has a key role in the protection and realization of the right to free access to information, as well as in the promotion and encouragement of the transparency and accountability of the institutions. Transparency has an inversely proportional effect on corruption, that is, the increase in transparency and access to information has an impact on the reduction of corruption at the national level.

The activities for the prevention of corruption by the Agency will be considered from two aspects:

- External aspect, that is, what the Agency for the Prevention of Corruption can do at the national level in relation to the activity of public interest;
- Internal aspect, that is, what measures the Agency will take to prevent and prevent corruption from within the institution itself;

• Regarding the first aspect, the activities undertaken by the Agency are defined as:

- The Action Plan 2023-2026 of the Strategy for the Reform of Public Administration 2023-2030, in which the Agency is the bearer of the activities for the fulfilment and realization of the special goal Z.4.: "Increased transparency of the institutions at the state and local level" with defined measures through which the activities will be carried out and realized;

- The Action Plan of the Agency's Strategy for 2021-2025, in which the activities for the fulfilment of the strategic goals "Facilitating the application of the right to access to public information" and "Increasing the efficiency and effectiveness of holders of public information" are defined for realizing the right to free access to information, contribute to increasing the transparency and accountability of the institutions.

> Regarding the second aspect, the Agency prepared this Annual Plan for the assessment of corruption risks, which is the basis for determining and defining the risk areas for corruption within its competence and scope of work, as well as identifying specific measures and activities for control and prevention of the occurrence of corruption.

1.3A THE AGENCY

Mission

Continuous implementation, promotion and protection of the right to free access to public information in the direction of increasing the transparency and accountability of institutions and facilitating access to public information.

A vision

Institutional recognition of the Agency as a credible affirmer and protector of the right to free access to public information.

The Agency for the Protection of the Right to Free Access to Public Information (hereinafter: the Agency) is an independent and independent state body, which works and makes decisions in accordance with the competencies established in the Law on Free Access to Public Information ("Official Gazette of the Republic of North Macedonia" no. 101/2019). According to the legal competencies defined in Article 30 of the Law, the Agency performs the following tasks:

- Conducts administrative proceedings and decides on appeals against the decision by which the owner of the information refused or rejected the request for access to information of the applicants;
- Takes care of the implementation of the provisions of this law, prepares and publishes a list of holders of information;
- Gives opinions on proposals for laws regulating free access to information,
- Develops policies and provides guidelines regarding the exercise of the right to free access to information;

- Conducts misdemeanour proceedings through the Misdemeanor Commission, which decides on misdemeanours in accordance with the law;
- Undertakes activities on the education plan of the holders of public information;
- Cooperates with the holders of information regarding the exercise of the right of access to information;
- Prepares an annual report on its work and submits it to the Assembly of the Republic of North Macedonia;
- Performs works of international cooperation;
- Promotes the right to free access and
- Performs other tasks in accordance with the Law;

2. IDENTIFIED AREAS SUBJECT TO CORRUPTION WITHIN THE SCOPE OF THE AGENCY

Based on an assessment of the factors that influence the operation of the Agency, the annual plan has determined 5 priority areas where there is often a risk of corruption:

- Individual and institutional integrity
- Improvement of the quality of work in the Agency
- Acting on reports of irregularities and reports from whistleblowers
- Public acquisitions
- Prevention of conflict of interest when undertaking official actions

Through the Action Plan that follows, an overview of specifically planned activities and the way of their operationalization, dynamics of their realization, holders and financial implications for the realization of the activities through which the defined measures would be successfully implemented, will be given.

Z. ACTION PLAN FOR 2024

Area 1: Individual and Institutional Integrity				
Measure	Activity	Holder/Competent organizational unit	Deadline for implementation	Financially implications
Promotion of personal and professional integrity and ethics of employees	Encouraging continuous consistency in respecting professional, ethical and institutional rules of operation	-Heads of organizational units -Senior management: Director and deputy director	Continuously	There is none
Professional development of employees and development of a culture of continuous learning	Development and implementation of human resource management policies and practices for their professional development and upgrading	-Heads of organizational units -Senior management: Director and deputy director	Continuously	There is none
Commitment of senior management in creating a moral and organizational culture of professionalism, legality and intolerance of corruption	Periodic assessments of work processes in order to identify their vulnerability to corruption	-Heads of organizational units -Senior management: Director and deputy director	Continuously	There is none
Area 2: Improving the quality of work in the Agency				
Measure	Activity	Holder/Competent organizational unit	Deadline for implementation	Financially implications
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Compliance with standards according to ISO 9001:2015 certification	Applying the procedures for the work processes in the Agency and monitoring the actions of the employees according to them	Authorized person	Continuously	There is none
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Enabling the full functionality of the document management system (OMS zuz1et)	Regular maintenance of the document management system	- Department for administrative-legal and general affairs - Department for ICT - information and communication technologies	Continuously	There is none
Area Z: Action on reports of irregularities and reports from whistleblowers				
Measure	Activity	Holder/Competent organizational unit	Deadline for realization	Financially implications
Strengthening the position of the person who reports irregularities and suspicions of fraud and corruption in the Agency	Creation of conditions for the performance of its obligations according to the regulations for public internal financial control	Authorized person reporting irregularities and suspicions of fraud and corruption	Continuously	There is none
Adequate application of the Whistleblower Protection Law, by-laws and internal procedure for protected internal reporting	Timely and legal action on reports submitted by whistleblowers, as well as notification of the measures taken by the report submitters within the legally established deadline	Authorized person for receiving reports from whistleblowers	Continuously	There is none
Raising the awareness of the Agency's employees about the possibilities for action under the Law on the Protection of Whistleblowers and the internal procedure for procedure for protected internal reporting	Acquaintance of the employees of the Agency with the Law on Protection of Whistleblowers and the Procedure for the Procedure for Protected Internal Reporting	Authorized person for receiving reports from whistleblowers	Continuously	There is none
Area 4: Public Procurement				

Measure * 1To1 . . /	Activity	Holder/Competent organizational unit	Deadline for realization	Financially implications
Strengthening integrity in public procurement	Encouraging continued consistency in compliance with the Code of	All employees involved in the public procurement process	Continuously	There is none

officials who prepare Decisions that decide on Appeals in accordance with the Law on Free Access to Public Information	officials who prepare Decisions that decide on Complaints (to the authorized person for receiving reports from whistleblowers)	Decisions with which decisions are made after Complaints Heads of organizational units that act on Complaints - Senior management: Director and Deputy Director		
Prevention of abuse by administrative officials who act when drafting Decisions that decide on Appeals in accordance with the Law on Free Access to Public Information	Reporting of attempted abuse by administrative officials who act during the preparation of Decisions that decide on Complaints (to the authorized person for receiving reports from whistleblowers)	All employees of the Agency - Heads of organizational units that act on complaints - Senior management: Director and Deputy Director	Continuously	There is none

Director,
Plamenka Bojcheva



