



**GOVERNMENT OF MONTENEGRO**

**OPERATING DOCUMENT FOR THE PREVENTION OF CORRUPTION IN THE AREAS EXPOSED TO  
SPECIAL RISK**

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Annex to the Action Plan for Chapter 23 – Judiciary and Fundamental Rights

**July 2016**

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## Introductory Remarks

Having in mind increasingly demanding obligations arising from the process of negotiation of Montenegro with the European Union, as well as the need not to lag behind in anticorruption reforms, and also given the fact that the period of validity of the Strategy for Fighting Corruption and Organised Crime (2010-2014) and its action plans expired at the end of 2014, it was necessary to adopt the document which would enable continuation of monitoring of activities in the areas exposed to special risk which were covered by the Strategy and accompanying action plans mentioned above. In revision and adaptation of the Action Plan for the negotiating chapter 23 – Judiciary and Fundamental Rights (hereinafter: AP 23), the section on anticorruption, i.e. point 2.1.7. set out adoption of the Operating Document for the prevention of corruption in the areas exposed to special risk (hereinafter: Operating Document) in order to address all those relevant issues that are not covered by this Action Plan.

In order to prepare the Operating Document, the Ministry of Justice set up the working group on 26 January 2016, which comprised, beside representative of this Ministry, also the representatives of the Ministry of Sustainable Development and Tourism (MSDT), Ministry of Economy (ME), Ministry of Health (MH), Ministry of Education (MEd), Ministry of Interior (MI), Police Directorate (PD), Public Procurement Administration (PPA) and Anticorruption Agency (AA). By Government Resolution of 29 February 2016, the Working Group had a duty to prepare a document by the 2<sup>nd</sup> quarter of 2016.

The Operating Document for the prevention of corruption in the areas exposed to special risk completely follows the methodology and structure of the AP 23, which is why reporting on this document will be done in the same period as will the reporting on the AP 23, and that will be the task of the Working Group for the preparation and negotiations on accession of Montenegro into the European Union in the area of European Union legislation related to the negotiating chapter 23 – Judiciary and Fundamental Rights. Specifically, monitoring of the implementation of the Operational document will be conducted through the coordinators of the field of prevention of corruption. Coordinators work directly with the contact person from competent authorities for the implementation of planned activities, and receive information from them on all issues relevant for the implementation. Based on the obtained data, a semi-annual report on implementation of the document will be prepared, which will then be approved by the Head of the Working Group and a member of the Negotiating Group. After that, the report will be submitted to the Ministry of Foreign Affairs and European Integration as the main coordinator of Montenegro's accession process to the EU. The report will then be reviewed by the Government at the same time as the

report on implementation of the Action Plan for chapter 23, and it will be submitted to the European Commission through the Ministry of Foreign Affairs and European Integration

## **Starting Basis for Preparation of the Operating Document**

Starting basis for preparation of the Operating Document included Informative Brief on the level of implementation of the measures set out in action plans for implementation of the Strategy for the Fight against Corruption and Organised Crime (2010-2014) from April 2015, Report on the level of implementation of the non-implemented and partly implemented measures and activities set out in the Strategy for the Fight against Corruption and Organised Crime (2010-2014) adopted on 21 January 2016, the adapted AP 23 from February 2015 and Analysis of the implementation of measures set out in strategic anticorruption plans for the areas exposed to special risks prepared by the Croat expert in March 2015.

In that regard, the Operating Document contains measures that are designated either as not implemented or partly implemented in the Action Plan for monitoring Strategy for the Fight against Corruption and Organised Crime, but also the new measures defined by representatives of competent institutions, in line with the guidelines given in the Analysis. In addition, in order to avoid duplication, measures defined by the AP23 were not repeated, moreover, new measures were specified in order to elaborate in more details and monitor through new activities the areas exposed to special risk

## **Areas Covered by the Operating Document**

Since the methodology used in preparation of the Operating Document for the prevention of corruption in the areas exposed to special risk is identical to that used in preparation of the AP 23 in respect of defining measures, setting time-limits, identifying bodies responsible for the implementation of measures, identification of necessary funding and indicators, the areas covered by the Operating Document accordingly follow the sequence which was set up in the anticorruption section in AP23, i.e. it follows up to the measures which are linked to the recommendations 2.1.6 and 2.1.7. in the Action Plan. These are seven areas: **Public Procurement, Privatisation, Urban Planning, Education, Health Care, Local Government and Police.**

## I PUBLIC PROCUREMENT

Even though the area of public procurement is dealt with in detail in the negotiating chapter 5, and in the AP 23 as well, the Operating Document also sets out measures for this area since the Strategy for the Fight against Corruption and Organised Crime (2010 - 2014) identified public procurement as the area exposed to special risk.

The measures in this area are predominantly related to the improvement of the normative framework, but also to building administrative capacity needed for implementation of the legislation and creation of technical conditions for establishment of efficient and transparent electronic public procurement system.

According to the data in the latest report on implementation of the AP for the fight against corruption and organised crime (2013-2014), in the area of public procurement five measures (71,43%) were implemented, two measures (28,57%) were partly implemented and there were no measures that were designated as not implemented.

No.	Measure / Activity	Competent authority / Responsible person	Time-limit	Required funding / Source of funding	Performance indicator
1.1	Adopt secondary legislation for establishment of the electronic public procurement system	MF, Public Procurement Authority (PPA)	IIQ 2017	Regular budgetary funds	Secondary legislation adopted.
1.2.	Report on implementation of the Strategy for Development of the Public Procurement System 2016-2020	MF, PPA, Coordinating body (MJ, MSDT, ME, MIS, Supreme Public Prosecutor's Office, Administration for Inspection Affairs (AIA), State Commission for the Control of Public Procurement Procedures (SCPPPP), Parliament of Montenegro, Chamber of Commerce, Union of Municipalities of Montenegro)	IVQ 2016 IIQ 2017 IVQ 2017 IIQ 2018 IVQ 2018	Regular budgetary funds	Reports of the Coordinating Body for monitoring and implementation of the Strategy for Development of the Public Procurement System 2016-2020 are adopted; Number of implemented, partly implemented and not implemented measures set out in the AP for implementation of the Strategy.

1.3.	Monitor implementation of anticorruption measures and measures for the prevention of conflict of interest in the public procurement procedure	PPA, Administration for Inspection Affairs (AIA), SCCPPP	IVQ 2016 and continuously once a year	Regular budgetary funds	Number of the submitted pieces of information about potential existence of the conflict of interest and corruption in public procurement procedures; Number of conducted controls, number of identified irregularities, number and type of sanctions imposed per year.
1.4.	Improve capacity of the State Commission for the Control of Public Procurement Procedures, Public Procurement Administration and Administration for Inspection Affairs	SCCPPP, PPA, AIA	IVQ 2016 IVQ 2017 IVQ 2018	Budget (approximately 20,000€ in 2016, 61,000€ in 2017, and 59,000€ in 2018)	Number of employees increased by 4 at the SCCPPP, by 4 at the PPA and by 5 inspectors at the Public Procurement Inspectorate.
1.5.	Create the necessary technical conditions for establishment of efficient and transparent electronic system for public procurement	MF, PPA	IVQ 2016 IVQ 2017 IVQ 2018	1.65 million € (1.5 million € through the project IPA 2014, 150,000€ as national co-financing)	Efficient and transparent electronic system for public procurement established.

## II PRIVATISATION (PUBLICITY AND TRANSPARENCY)

**Legal framework in the national legislation governing privatisation should be improved through adoption of the new laws and secondary legislation for their enforcement, while at the institutional level the plan is to set up the Agency for Investments and independent bodies for control of operations of privatised monopolistic companies. Implementation of the other measures in this area will contribute to transparency of the work of the Council for Privatisation and Capital Projects and improvement of the work of the Commission for Monitoring and Control of the Privatisation Procedures at the Parliament of Montenegro. Moreover, measures envisage organisation of public consultation for the purpose of developing strategies for privatisation of enterprises of special interest for the public, particularly in the area of transport, tourism and energy, while ensuring access to information that is relevant for this area.**

**According to the data from the latest report on implementation of the AP for the fight against corruption and organised crime in this area, five measures (31,25%) were implemented, nine measures (56,25%) were partly implemented, while two measures (12,50%) were not implemented.**

<b>No.</b>	<b>Measure / Activity</b>	<b>Competent authority / Responsible person</b>	<b>Time-limit</b>	<b>Required funding/ Source of funding</b>	<b>Performance indicator</b>
2.1.	Adopt the Law on Public Private Partnerships that will lay down conditions, manner of and procedure for approving projects involving public private partnerships, rights and obligations of public and private partners, contents of and procedure for concluding PPP contracts, forms of public-private partnerships, procedures for selection of the most favourable bidder etc. The Law on Public-Private Partnerships should set out how to control implementation of the concluded PPP contracts.	MF	IIIQ 2017	Regular budgetary funds	Law on Public-Private Partnerships adopted; Agency for Investments established, in accordance with the Law; Report on implementation of the Law and main conclusions of the Report prepared a year after adoption.
2.2.	Set up the Agency for Investments in accordance with the Law on Public-Private Partnerships	MF	Within the period prescribed by the Law on Public-Private Partnership	Regular budgetary funds	Agency for Investments established.
2.3.	Prepare feasibility studies, cost-benefit analyses and risk	Council for Privatisation and Capital Projects, line	IVQ 2016 IVQ 2017	Regular budgetary funds	Number of feasibility studies and number of cost-benefit analyses

	assessments before each individual privatisation of big enterprises	ministries	IVQ 2018		against the number of planned and completed privatisations of big enterprises.
2.4.	Ensure access to information, as well as to the decisions and contracts related to the privatisation process	ME, Commercial Court, Council for Privatisation and Capital Projects, Government, Secretariat for Development Projects, Agency for Personal Data Protection and Free Access to Information	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of decisions published on website of the Council for Privatisation and Capital Projects and of the Government; Number of published decisions on the results of the conducted procedures; Number of published pieces of information on the completed investments, which were envisaged in privatisation contracts; Number of documents published on website of the Council; Number of accepted and rejected applications against the number of applications for free access to information; Number of decisions annulled by the Agency for Personal Data Protection and Free Access to Information.
2.5.	In accordance with the Privatisation Plan, organise public consultations on strategies for privatisation of enterprises with strategic importance, particularly in the	Council for Privatisation and Capital Projects in cooperation with the line ministries	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of organised public consultations on strategies; Number of adopted recommendations against the number of submitted recommendations that were given



	areas of energy, transport, tourism and privatisation of public enterprises				in public consultations.
2.6.	Improve transparency of work of the Council for Privatisation and Capital Projects through regular publication of the documents and information on the work of the Council	Council for Privatisation and Capital Projects, Government of Montenegro	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Numbers of sessions held; Number of sessions to which third parties were invited; Number of published decisions/conclusions of the Council in accordance with the Law.
2.7.	Improve the template for reporting corruption cases on website of the Council for Privatisation and Capital Projects	Council for Privatisation and Capital Projects in cooperation with the Agency for Prevention of Corruption	IIIQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Template improved; Number of reports filed per year;
2.8.	Improve and ensure efficient work of the Commission for Monitoring and Control of the Privatisation Procedure	Commission for Monitoring and Control of the Privatisation Procedure at the Parliament of Montenegro	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of sessions of the Commission that were held; Number of adopted conclusions with recommendations issued by the Commission; Number of implemented conclusions with recommendations that the Commission submitted to the Council for Privatisation and Capital Projects.

### III URBAN PLANNING

Measures defined in the area of urban planning refer to improvement of the legal framework governing spatial planning and construction of structures, as well as legalisation of informal structures and administrative capacity building of inspection authorities. Creation of technical preconditions for electronic issuance of building permits and establishment of the registry of planning documents, as well as informing citizens about the procedures set out in laws through implementation of a media campaign will also contribute to the

**prevention of corruption in this area.**  
**According to the data from the latest report on implementation of the AP for the fight against corruption and organised crime in this area, seven measures (63,64%) were implemented, while two measures were not implemented (18,18%) and two were partly implemented (18,18%).**

No.	Measure / Activity	Competent authority / Responsible persons	Time-limit	Required funding/ Source of funding	Performance indicator
3.1.	Adopt the Law on Legalisation of Informal Structures	MSDT	IVQ 2016	Regular budgetary funds	Law adopted.
3.2.	Adopt secondary legislation for enforcement of the Law on Legalisation of Informal Structures, as follows: 1. Rulebook on more detailed content, form and manner of preparing technical documentation for the procedure for legalising informal structures and criteria for testing condition of infrastructure and seismic stability of the location and static and seismic stability of informal structures, 2. Rulebook on more detailed content of the records and categorisation of informal structures	MSDT	IIQ 2017	Regular budgetary funds	Secondary legislation adopted.
3.3.	Adopt the Law on Spatial	MSDT	IIIQ 2016	Regular budgetary	Law adopted;

	<p>Planning and Construction of Structures which will introduce:</p> <ul style="list-style-type: none"> <li>- revision of the planning documents and</li> <li>- electronic issuance of permits.</li> </ul>	MSDT LGU	IIIQ 2016 – IVQ 2018 (revision and electronic issuance)	funds	Number of conducted revisions of planning documents per year.
3.4.	Adopt amendments to the Rulebook on organisation and job descriptions of the AIA which will increase the number of job positions for urban planning and construction inspectors.	ME, AIA	IQ 2017	Regular budgetary funds	Rulebook adopted.
3.5.	Build administrative capacity of the AIA by employing 10 urban planning inspectors and 10 construction inspectors	MF, AIA	IQ 2017 IQ 2018	Budget 2017 – 120.000€, 2018 – 120.000€	Administrative capacity strengthened in 2017 by employing 5 urban planning inspectors and 5 construction inspectors, and by employing 5 urban planning inspectors and 5 construction inspectors in 2018
3.6.	Set up electronic system for issuance of urban-technical requirements (UTR) and building permits	MSDT	IQ 2017 I Q 2018 (reporting on the second indicator)	Budget 2017 – 100,000 €	Electronic system of urban-technical requirements (UTR) and building permits established; Number of issued UTR and building permits.
3.7.	Continuously keep the registry of planning documentation in order to avoid their potential	MSDT	IIIQ 2016 IVQ 2016 IVQ 2017	Budget 74,990 € (50% budget, 50%	Number of new planning documents introduced into the registry;

	illegal modifications		IVQ 2018	World Bank project)	Number of new technical documents introduced into the registry.
3.8.	Intensify control procedure in the area of spatial planning and construction of structures in cases when legal requirements are met	MSDT, Chamber of Engineers of Montenegro (CEM)	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of revoked permits against the number of controls that have been carried out; Average time of duration of the procedure.
3.9.	Regularly monitor issuance of permits at the local level	MSDT	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Report on the procedures for issuance of UTR, building permits and occupancy permits by local governments
3.10	Conduct media campaign to provide information about the procedures set out in the Law on Spatial Planning and Construction of Structures and Law on Legalisation of Informal Structures	MSDT	I Q 2017	Budget 70,000 € (2016)	Number and type of implemented activities
3.11.	Conduct the procedure for legalisation of informal structures	MSDT, LGU	IVQ 2017	Regular budgetary funds	Data on legalised structures posted on website of the MSDT; Number of received and number of accepted applications for the legalisation of structures; Number and type of legalised structures; Data available on website of the competent ministry.

#### IV EDUCATION

**In the area of education, measures were defined with regard to preparation of the Integrity Plan for all the educational institutions,**

**transparency in employment in all educational institutions, system for testing and assessment of the knowledge of pupils and students, awareness raising and informing citizens about the possibilities of reporting corruption in education sector.**  
**According to the data from the latest report on implementation of the AP for the fight against corruption and organised crime in this area, nine measures (64,29%) were implemented, three measures (21,43%) were partly implemented, while two measures (14,29%) were not implemented.**

<b>Br.</b>	<b>Measure/ Activity</b>	<b>Competent authority</b>	<b>Time-limit</b>	<b>Required funding/ Source of funding</b>	<b>Performance indicator</b>
4.1.	Draw up and adopt integrity plan in all educational institutions and at the University of Montenegro	Ministry of Education, University of Montenegro, Anticorruption Agency	IIIQ 2016	Regular budgetary funds	Number of adopted integrity plans by educational institutions and at the University of Montenegro against the total number of these institutions in Montenegro.
4.2.	Prepare analysis of integrity plans	Anticorruption Agency	IIQ 2017	Regular budgetary funds	Analysis with recommendations for improving integrity plans prepared.
4.3.	Monitor implementation of the prescribed rules and criteria for employment of the managerial and teaching staff at all levels of education	AIA, University of Montenegro	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of controls and identified irregularities in employment of managerial and teaching staff (diplomas, contracts etc.); Number of identified cases of dual employment; Number and type of imposed sanctions for each of the identified irregularities; Formation of the Commission in schools for assessment/evaluation of the candidates which have applied for work in schools and their applications, with the aim of

					objectifying criteria in employment.
4.4.	Carry out quarterly controls of accommodation capacities of the dormitories for pupils and students	Ministry of Education, Dormitories for pupils and students	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of conducted controls; Number of identified irregularities; Number of eliminated irregularities.
4.5.	Develop software for checking scientific papers in all high education institutions in order to detect plagiarism	All high education institutions in Montenegro	IVQ 2017	Project "High Education and Research for Innovation and Competitiveness"	Software developed; Number of software checks on scientific papers; Results of software checks on scientific papers.
4.6.	Improve the process of control of the testing of students and assessment of their knowledge	University of Montenegro	IVQ 2018	Funding not provided – procurement of proper equipment will be sought through European funds	Established obligation of identity protection/coding of students in written exams; Number of university units furnished with electronic equipment for disrupting the use of technical aids, against total number of university units.
4.7.	Monitor competitions for allocation of funds for the projects involving co-financing scientific and technical cooperation	Ministry of Science	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of completed competitions; Number of complaints and appeals on filed grounds of irregularities in allocation; Number of accepted complaints and appeals; Number of rejected complaints and

					appeals;
4.8.	Organise lectures and seminars to raise awareness among students with regard to corruption	Ministry of Education, Bureau for Education Services, Anticorruption Agency	IVQ 2017	Regular budgetary funds	Number and type of lectures and seminars that were held. Number and structure of participants.
4.9.	Conduct a research into forms, causes and mechanisms of the occurrence of corruption in education sector	Ministry of Education	IVQ 2018	Budget, project or donations	Research conducted at all levels of education and results posted on website of the Ministry of Education; Main conclusions of the research.
4.10.	Continue informing the citizens about the possibilities of reporting corruption through the phone line or email	Ministry of Education, AIA (Education Inspectorate), Anticorruption Agency	IVQ 2016 and continuously once a year	Budget	Type and number of the distributed campaign material. Number of reports filed.

## V HEALTH SECTOR

**The health sector, as one of the seven areas exposed to special risk, occupies prominent position in the Operating Document and, based on the challenges we face, measures are defined in this area in relation to improving secondary legislation for enforcement of laws, monitoring corruption cases in the health sector and improvement of information systems for the purpose of higher quality management of the health care system through establishment of indicators, rational utilisation of resources, increase in quality of the health care services and identification of potential abuses of office.**

**According to the data from the latest report on implementation of the AP for the fight against corruption and organised crime in this area, 11 measures (84,62%) were implemented, while two measures (15,38%) were partly implemented.**

No.	Measure / Activity	Competent authority / Responsible person	Time-limit	Required funding/ Source of funding	Performance indicators
5.1.	Adopt the Rulebook on the type of health services for which waiting lists can be compiled and manner and procedure for compiling the waiting lists	Ministry of Health (MH)	IVQ 2016	Regular budgetary funds	Rulebook adopted; Lists updated on a monthly basis and available on website of the MH and Health Care Institutions (HCI); Number of interventions in line with the waiting lists.

5.2.	Monitor compliance with the Code of Ethics	Medical Chamber (MC)	IV Q 2016 IV Q 2017	Regular budgetary funds	Number of disciplinary actions; Number of medical staff that violated the Code of Ethics.
5.3.	Adopt Guidelines on the manner of recording donations and sponsorships	MH, Health Care Institutions (HCI)	IIIQ 2016 and continuously	Regular budgetary funds	Guidelines adopted; Guidelines available on website of the MH and HCI; Annual report on donations and sponsorship available on website of the MH. The report is to include the following: number of issued approvals, number of concluded contracts on donations against the total number of the proposed contracts on donations, as well as the number of medical staff whose professional development and participation in conferences were financed by private medical and pharmaceutical companies, against the total number.
5.4.	Monitor implementation of the Rulebook on additional employment	MH, AIA, HCI	IVQ 2016 IVQ 2017	Regular budgetary funds	List of medical workers who have concluded the contract on additional employment posted on website of the MH and HCI, and of legal entities as well; List of HCI and other legal entities in which medical staff has additional employment is posted on website of the MH, HCI and legal entities;



					<p>Number of conducted controls;  Number of identified irregularities;  Number and type of sanctions imposed on medical workers employed in health care institutions who are not placed on the list of medical workers that concluded contract on additional employment, or those employed in a HCI or in another legal entity that are not placed on the list of HCI and legal entities in which medical workers are engaged in additional employment.</p>
5.5.	<p>Monitor implementation of the contracts concluded between the Health Insurance Fund (HIF) and private health care institutions</p>	HIF, MH	IVQ 2016 IVQ 2017	Regular budgetary funds	<p>List of health care institutions and legal entities with which the HIF concluded contracts is available on website of the HIF and MH;  Number of contracts concluded between the HIF and private health care institutions;  Percentage share in costs of health care received outside of the state institutions;  Number of controls carried out in respect of implementation of the contracts;  Number of identified irregularities;  Number and type of imposed sanctions, in accordance with the</p>

					contract.
5.6.	Monitor number of submitted reports of corruption in health care sector	MH, HCI	IVQ 2016 IVQ 2017	Regular budgetary funds	Number of reports submitted to the MH and HCI
5.7.	Control issuance of receipts in health care institutions	Tax Administration	IVQ 2016 IVQ 2017	Regular budgetary funds	Number of conducted controls; Number of identified irregularities; Number and type of imposed sanctions.
5.8.	Develop internal procedure for the preparation of public procurement plans specifying necessary amounts of funding in line with the valid substantive legislation and standards in this area	MH, HIF	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	The developed internal procedure available on website of the MH, Fund and HCI; Comparative amount of funds spent for the past three years on prescription drugs, drugs administered at the HCI, vaccines, medical aids and material.
5.9.	Develop the existing HIS (Health Information System) at the CCM and in three special hospitals	MH, HIF, CCM (Clinical Centre of Montenegro), Special Hospitals (SH)	IVQ 2016 IVQ 2017	Regular budgetary funds of the HIF	Software solutions implemented at the CCM and SH which cover the work of physicians in the outpatient care, physicians and nurses on the ward and in the operating room. Electronic appointments are possible by using application ID of specialist checks at the CCM and SH.
5.10.	Enhance the existing IT system to ensure higher quality management of the health care	MH, HIF, HCI, IPH (Institute of Public Health of Montenegro)	IVQ 2016 IVQ 2017	Regular budgetary funds of the HIF; Potential donors:	Reporting indicators defined.

	system through establishment of indicators, rational utilisation of resources and improvement of quality of the health care services.			World Bank, IPA, World Health Organization	
5.11.	Conduct survey among patients and medical staff regarding corruption in the health care system in 2016.	MH, IPH	IIQ 2017	Donation 10,000 €	Survey conducted and results posted on website of the MH; Number of given recommendations.
5.12.	Conduct survey on satisfaction of users with the provided health care services.	MH, IPH	IVQ 2016 and continuously		Survey conducted and survey results posted on website of the MH; List of HCI that conduct, on a regular basis, the surveys on satisfaction of users with the provided health care services; List of HCI that implement the AP HCI for elimination of the complaints identified in the survey on satisfaction of users with the health care services provided to them.

## VI LOCAL GOVERNMENT

**Having in mind specificities and differences characterising the area of local government, the measures in this area are focused on preparation of the integrity plans for local government units, ensuring transparency of the process of employment in local government bodies, improving transparency in the conducting public procurement procedures and monitoring public procurement in municipalities, improving cooperation of civil and private sectors with local government units (LGU) for the purpose of engaging in the fight against corruption at the local level, as well as establishing channels for corruption reporting in local governments.**

**According to the data from the latest report on implementation of the AP for the fight against corruption and organised crime in this area, seven measures (77,78%) were implemented, two measures were partly implemented (22,22%), while there was no measures that were**

<b>not implemented.</b>					
<b>No.</b>	<b>Measure / Activity</b>	<b>Competent authority / Responsible persons</b>	<b>Time-limit</b>	<b>Required funding/ Source of funding</b>	<b>Performance indicator</b>
6.1.	Prepare and adopt integrity plans in municipalities	Anticorruption Agency	IIIQ 2016	Regular budgetary funds	Number of adopted integrity plans in municipalities
6.2.	Prepare Analysis of adopted integrity plans in municipalities	Anticorruption Agency	IIQ 2017	Regular budgetary funds	Analysis with recommendations for improvement of integrity plans prepared
6.3.	Regularly monitor employment in LGUs and ensure transparency of the employment process through publication of annual reports which contain statistics on the total number of employees in local government bodies and newly employed staff along with the justification of the need to increase the number of employees	MI, Local Government Units (LGU)	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Annual report published (include the link); Number of employees and newly employed staff in the reporting year; Number of advertised vacancies; Number of published ranking lists after the testing; Number of accepted appeals lodged against the decision on employment relative to the number of lodged appeals; Outcome of the proceedings initiated upon accepted appeals.
6.4.	Draw up and submit annual reports on the completed public procurement procedures and concluded public procurement contracts to the	PPA in cooperation with LGU	IQ 2017 and continuously once a year	Regular budgetary funds	Number of submitted annual reports on completed public procurement procedures at the local level

	Public Procurement Administration				
6.5.	Organise training for employees of the local government in accordance with the Strategy for Professional Development of Civil Servants and State Employees in Montenegro 2015-2018, General Programme for Professional Training and Advancement of local civil servants and state employees and Training Plan.	HRMA, Union of Municipalities of Montenegro	IIIQ 2016 IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number and type of organised training courses; Number and structure of participants.
6.6.	Regularly inform citizens about the procedures for preparation and adoption of the acts of public interest for the purpose of their active involvement and contribution	Union of Municipalities of Montenegro, LGU	IIIQ 2016 IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of the consultations held; Number of published invitations to public consultation in electronic and print media; Number of submitted suggestions; Number of accepted suggestions from public consultations; Number of published reports on the public consultations that were held.
6.7.	Set up the system for receiving and acting upon whistle-blowers' reports by LGU in accordance with the Law on the Prevention of Corruption	Anticorruption Agency, LGU	IQ 2017	Regular budgetary funds	Number of local government bodies that designated a person responsible for receiving and acting upon whistle-blowers' reports; Number of reports filed with the

					LGU.
6.8.	Continuously promote the system for receiving and acting upon whistle-blowers' reports and organise training on how to receive and act upon whistle-blowers' reports	Anticorruption Agency, LGU	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number and type of informative campaigns conducted by the Agency; Number of training courses organised for employees of the Agency who are responsible for receiving and acting upon whistle-blowers' reports; Number of training courses organised for employees of authorities who are designated to act upon whistle-blowers' reports.
6.9.	Continuously conduct inspection control of the procedure for filling vacancies, procedure for vacancy announcement and employment in local government units	MUP (Administrative Inspectorate)	IIQ 2016 IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of conducted inspection controls, number of identified irregularities and number and type of the measures taken.
6.10.	Continuously conduct inspection control and administrative control of the legality of work of local government for the purpose of monitoring implementation of the Law on Local Government Financing	MF	IIQ 2016 IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of conducted inspection controls; Number of identified irregularities; Number and type of measures taken.
6.11.	Continuously conduct inspection control and	MSDT	IIQ 2016 IVQ 2016	Regular budgetary funds	Number of conducted inspection controls;

	administrative control of legality of the work of local government units for the purpose of monitoring implementation of the Law on Spatial Planning and Construction of Structures and Law on Public Utilities.		IVQ 2017 IVQ 2018		Number of identified irregularities; Number and type of measures taken.
<b>VII POLICE</b>					
<b>In the area of preventing corruption in police, the measures were defined to monitor implementation of the Integrity Plan, strengthen administrative and technical capacities of the Division for Internal Control of the Police Work.</b>					
<b>According to the data from the latest report on implementation of the AP for the fight against corruption and organised crime, all the measures in this area, of which there were nine, were implemented.</b>					
<b>Br.</b>	<b>Measure / Activity</b>	<b>Competent authority / Responsible person</b>	<b>Time-limit</b>	<b>Required funding/ Source of funding</b>	<b>Performance indicator</b>
7.1.	Regularly monitor implementation of the Integrity Plan of the Ministry of Interior/Police Directorate	MI, PD	IQ 2017 IQ 2018	Regular budgetary funds	Report on implementation of the Integrity Plan prepared.
7.2.	Ensure monitoring of implementation of the conclusions and recommendations given by the Council for Civilian Control of the Police Work.	MI	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds	Number of findings and recommendations of the Council submitted to the minister; Number of pieces of information on implementation of the findings and recommendations which the Council received from the minister; Number of implemented findings and recommendations given by the Council.

7.3.	Fill the remaining (four) vacancies at the Division for Internal Control of the Police Work in accordance with Rulebook on internal organisation and job descriptions of the MI.	MI	IVQ 2016	Regular budgetary funds 54,000€ (4 employees)	Vacancies at the Division for Internal Control of the Police Work are filled.
7.4.	Provide technical and material means for the Division for Internal Control of the Police Work that are needed for performance of tasks in respect of internal investigation and counterintelligence protection (GPS and audio surveillance)	MI	IIIQ 2016  IVQ 2016	Regular budgetary funds	Plan of necessary equipment for the Division for Internal Control of the Police Work prepared; Equipment procured and functioning.
7.5.	Organise training for police officers and trainers from the MI and PD on integrity strengthening and compliance with the police Code of Ethics	MI, PD	IVQ 2016 IVQ 2017 IVQ 2018	Regular budgetary funds Donations 10,000€ per year	Training Plan and Programme for police officers and trainers from the MI and PD is prepared; Number and type of training courses; Number and structure of participants; Number of trainers who were trained.