

REPUBLIC OF NORTH MACEDONIA
MINISTRY OF INTERIOR

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S k o p j e

No country is immune to corruption as a negative phenomenon of modern life. Regardless of its level of development, corruption is present in all segments of social life.

Corruption is a dynamic phenomenon that has many forms and is associated with various economic, legal, political, sociological and other factors. The negative effects of corruption are enormous and far-reaching, extending throughout the public, private and civil sectors. Corrupt behaviour undermines trust in the institutions of the system, the efficient use of public resources and poses a threat to democracy and the exercise of human rights due to erosion of social values.

Research on the perception of citizens shows acceptance of corruption as a way of life. It is deeply and widely spread in all parts of society, which indicates the necessity of its reduction, with a view to its eradication.

The Government of the Republic of North Macedonia pays great attention to the process of building standards and principles for prevention in the fight against corruption, development of democracy, rule of law, successful dealing with all types of crime and criminal behaviour, including all forms of organized crime.

The main challenge for the Ministry of Interior as a key institution for detecting cases related to corruption, as well as its prevention, involves the timely detection and identification of corruption risks, as well as the timely detection, documentation and proof of corrupt behaviour in which authorized officials were involved.

The main goal of the Ministry of Interior in the fight against corruption is its reduction and achieving an anti-corruption culture among the employees, building the integrity of the employees in the Ministry of Interior in accordance with the European standards, raising awareness of the employees through appropriate training,

eliminating the conditions for the existence of corruption in the police and unprofessional conduct, and establishing the desired ethical standards.

The Ministry of Interior, with its proactive fight against corruption and its absolute unacceptability, is building control mechanisms, measures and activities that will narrow down the space for corrupt behaviour of the employees in the Ministry and the Police, as well as help detect and appropriately sanction each specific case.

Based on the National Strategy for the Prevention of Corruption and Conflict of Interest 2021-2025 of the State Commission for Prevention of Corruption and the GRECO Evaluation Report on the RNM - Fifth Round on "Preventing Corruption and Promoting Integrity in Central Government and Law Enforcement Bodies, the established priorities and commitments for dealing with corruption at the state level but also within its own ranks";

Starting from the vision of a society based on the highest ethical values and integrity that provides all citizens with equal access to responsible and transparent institutions and respect for human rights and freedoms;

Recognizing the need to ensure increased trust in the institutions of the system, efficient use of public resources and strengthening of democracy, social values and observation of human rights;

Considering that corruption represents a particularly complex social, security, political and economic phenomenon that poses a threat to the functioning of democracy and the rule of law and directly leads to violations and abuse of human rights and freedoms, and provides conditions for the development of organized crime and other threats to the security and stability of the state and citizens.

Department for Internal Control, Criminal Investigations and Professional Standards on behalf of the Ministry of the Interior for 2025, adopts the following:

A N T I – C O R R U P T I O N P R O G R A M M E

I. PURPOSE:

The fight against corruption is determined as the top strategic priority in the Strategic Plan of the Ministry of Interior 2024-2026, which stipulates that in the upcoming period, the Ministry shall focus on boosting the efficiency and effectiveness of its work in order to strengthen the rule of law through a non-selective fight with organized crime, corruption, irregular migration, terrorism and cyber-threats.

Along these lines, this Anti-Corruption Programme aims to establish a system of measures that will enable tackling corruption and identifying the causes, conditions and factors that enable its spread.

For an effective fight against corruption, political will, normative solutions, institutional framework, efficient application of laws, institutional and personal capacity and integrity, as well as cooperation between institutions in the country and internationally are equally important.

The fight against corruption at the level of the Ministry of Interior implies the existence and cooperation of the Ministry with other line ministries, state bodies and institutions for the fight against corruption and crime in general. Cooperation should serve as a basic foundation and guiding force of the institutions in the fight against corruption. In this regard, it is necessary to have a functional connection and the formation of a common database to which all entities responsible for the fight against corruption will have access, in order to exchange information in order to ensure a sustainable system of a common approach in the realization of the institutions' own obligations for the non-selective fight against corruption.

POLICE CORRUPTION:

The Law on Prevention of Corruption and Conflict of Interest defines corruption as "abuse of function, public authority, official duty or position for the purpose of

obtaining benefit, directly or through an intermediary, for oneself or for another".

The most common corruption risk factors are:

- systemic or external corruption risk factors. These are factors that reflect the existing situation in terms of legal regulation in a given area, rule of law, functioning of institutions, etc.;

- institutional/organisational corruption risk factors. These are factors that arise from the institutional set-up of the public system, and most often appear as: lack of policies, procedures and systems for a specific area, inadequate human resources management, impunity for certain omissions in working, inadequate work conditions;

- individual corruption risk factors. These are factors that may influence individuals to engage in corrupt or unethical behaviour: lack of integrity, lack of knowledge and skills, inadequate supervision of work, conflict of interest, work pressures, culture of behaviour and

- corruption risk factors related to the operational process in a given area: lack of transparency in work, inadequate documentation management system, excessive discretionary powers, etc.

The term corruption in the Ministry of Interior refers to any violation of standard procedures and actions, abuse of official duty or exceeding police powers for the purpose of directly or indirectly promised, offered, given, requested, accepted or expected benefit, for oneself or for someone else.

The most common factors that contribute to the occurrence of corruption in the police are: interaction between unprofessionalism and poor organization, employment of unskilled personnel, neglect of the criteria for selection, promotion, deployment and training of employees in the Ministry.

The Ministry of Interior, with its proactive fight against corruption and its absolute unacceptability, is building control mechanisms, measures and activities that will narrow down the space for corrupt behaviour of the employees in the Ministry and the Police, as well as help detect and appropriately sanction each specific case.

It is the obligation of all employees to act in accordance with the rules, regulations and professional standards applied in the Ministry and the Police when performing their work tasks. Every employee is required to respect the Code of Ethics, to demonstrate a high level of integrity in their work, to know how to recognize forms of corruption, and to possess the ability to oppose corruption. No one should be an exception when determining responsibility for corrupt behaviour, just as no one has the mandate to hinder, limit or in any way dilute the process of determining responsibility.

The corruption in the Ministry of Interior is recognized through:

- actions or inaction by the employees of the Ministry when performing official tasks for which they request or accept some benefit, convenience or interest for themselves or for another in return;
- failure to comply with standard procedures and actions;
- abuse of official position and powers for the purpose of directly or indirectly promised, offered, given, requested, accepted or expected material or immaterial benefit, convenience, advantage or other interest for oneself or for another.

The main goal of the Ministry of Interior in the fight against corruption is its reduction and achievement of an anti-corruption culture among employees, building the integrity of employees in the Ministry of Interior in accordance with European standards, raising the awareness of the employees through appropriate training, eliminating the conditions for the existence of corruption in the police and unprofessional conduct and establishing the desired ethical standards.

III. PROGRAMME ACTIVITIES

Anti-corruption activities will be aimed at promoting professionalism, legality in work and improving police integrity through consistent compliance with legal and by-law regulations and preventing and sanctioning all forms of corruption in the Ministry of Interior.

Considering the provisions of the Anti-Corruption Programme of the Ministry of Interior for 2024, special attention is paid to:

- strengthening integrity and responsibility in work and creating citizens' trust in the institution;
- consistent compliance with the Code of Ethics for the Conduct of the Employees in the Ministry;
- preventive action that implies reducing the risks of corruption;
- repression as a tool for sanctioning corruption and other types of abuse of authority;
- developing a high awareness of the harmfulness of corruption among ourselves and other employees;
- having the attitude that it is necessary to remove corruption from the environment in which we live and work and to set an example for other employees in the Ministry of Interior;
- to reject the offer for participation in corrupt behaviour;
- to understand that if we behave corruptly, we cause greater harm to society than the benefit that is achieved, to be aware that by acting in this way we expose ourselves to criminal sanctions and the possibility of losing our job.

Along the lines of the above, the following shall be the priority goals for 2025:

1. Strengthening police integrity and raising the ethical awareness of employees through compliance with the Code of Ethics for the Conduct of Employees in the Ministry;
2. Implementation of the measures and activities envisaged in the Action Plan for the Implementation of the Integrity Plan 2023-2025;
3. Consistent compliance with the legal regulations;
4. Transparent procedure for employment and promotion in the Ministry;
5. Education of employees in the Ministry of Interior for the purpose of protected internal and external reporting of corrupt behaviour in the Ministry;
6. Obligation to declare assets/interests by the employees in the Ministry;
7. Continuous and specialized training in the Ministry;
8. Promoting cooperation between state bodies and institutions responsible for preventing and combating corruption, non-governmental and international organizations;
9. Control mechanisms over the exercise of discretionary powers by police officers;
10. Transparency in the Ministry;
11. Implementation of internal controls by the Department of Internal Control, Criminal Investigations and Professional Standards

12. Digitalization of work processes in the Ministry of Interior.

III. 1. STRENGTHENING POLICE INTEGRITY AND RAISING ETHICAL AWARENESS OF EMPLOYEES THROUGH OBSERVATION OF THE ETHICAL CODE OF CONDUCT OF THE MINISTRY EMPLOYEES

When talking about corruption, the concept of integrity is also necessarily considered. The concept of "integrity" means the legal, independent, impartial, ethical, responsible and transparent performance of activities by which officials protect their reputation and the reputation of the institution for which they are responsible, i.e. in which they are employed, remove risks and doubts about the possibility of the occurrence and development of corruption and thus gain the trust of citizens in the exercise of public functions and in the work of public institutions.

Integrity and corruption are two opposing phenomena, i.e. any corrupt action implies a violation of integrity. The integrity system within the institution denotes the sum of all policies, standards, procedures that strengthen their resistance to corruption and reduce the risk of corrupt behaviour by the employees of the institution.

Integrity in police work is a principle of constant behaviour in accordance with ethical values. When it comes to the integrity of the Ministry of Interior, the focus falls on the creation of a set of values and their integration into existing bylaws, appropriate strategies, plans and other regulations relating to corruption and corrupt behaviour.

Police integrity requires that police work be carried out with clearly defined ethical values such as transparency, impartiality, equality, fairness, honesty and respect for human rights. The police should promote integrity at all its levels, and a police officer with integrity needs to set an example in the environment because he is the key in the fight against corruption and a protector of human rights. A police officer with integrity needs to possess knowledge and skills, ethical capacity, determination and professionalism through respect for established rules and procedures that will benefit the public interest and contribute to increasing the public trust. The personal integrity

of a police officer reflects the integrity of the Ministry of Interior, and therefore the integrity of the management staff is of great importance, by imposing high professional values, to ensure consistent compliance with the rules and regulations when performing work tasks by the employees of the Ministry.

In order to establish rules of conduct during the performance of work tasks, mutual relations, relations with citizens and protection of the public interest, the Ministry of Interior adopted a Code of Ethics for the Conduct of Employees in the Ministry, which consolidated the provisions on ethical issues and offered practical guidelines in the area of police integrity, conflict of interest, gifts and prevention of corruption. In order to prevent the occurrence of corrupt acts among police officers, it is not allowed to request or accept gifts (goods and services or other goods) intended for them personally or their families if their offering or granting is directly or indirectly related to their professional activity.

Based on the provisions of the Code of Ethics for the Conduct of Employees in the Ministry, the Minister of Interior has authorized a person to provide advice on integrity, conflict of interest and receiving gifts, whose personal data is publicly published on the website of the Ministry of Interior. Also, considering that high level of police integrity is the very basis of the effective fight against crime and corruption, the Minister of Interior has signed an Integrity Policy which is published on the website of the Ministry of Interior.

In compliance with the recommendations of GRECO, according to which each state administration body should adopt bylaws for a detailed regulation of the matter related to conflict of interest and receiving gifts, the Minister of Interior adopted Instructions on the Manner of Conduct of Elected and Appointed Persons and Employees in the Ministry of Interior in order to Prevent Conflict of Interest in the Ministry of Interior no. 13.1.1-74120/1 of 28.05.2023 and Instructions on the manner of conduct with gifts, benefits and hospitality in the Ministry of Interior no. 13.1.1-74117/1 of 28.05.2023.

It is necessary for the employees in the Ministry to possess a high level of knowledge of the Code of Ethics, in order to ensure legality, professional and personal integrity, high morals and standards, efficiency, effectiveness, dedication and increased

responsibility in performing work tasks, as well as respect for human rights, through equal treatment and non-discrimination.

The Section for Integrity, Corruption Prevention and Human Rights Protection in the Department for Internal Control, Criminal Investigations and Professional Standards continuously conducts trainings for all employees in the Ministry of Interior on all topics related to the implementation of the integrity system in the Ministry as a basic premise in the fight against corruption, with a special emphasis on raising the level of professional integrity of employees, preventing conflicts of interest and receiving gifts, encouraging employees of the Ministry of Interior to report punishable or other illegal or impermissible conduct that violates or threatens the public interest.

III.2. IMPLEMENTATION OF THE MEASURES AND ACTIVITIES PROVIDED FOR IN THE ACTION PLAN FOR THE IMPLEMENTATION OF THE INTEGRITY PLAN 2023-2025;

The Institutional Corruption Risk Assessment is a corruption management process that is already being implemented in the Republic of North Macedonia and it enables identification of corruption risks, i.e. factors that can contribute to corruption.

The best preventive defence against corruption is a stable system of internal controls that should be designed and implemented as an appropriate response to the risks identified during the risk assessment activities. However, institutions should also work to establish an appropriate structure and culture that will discourage potential corrupt behaviour.

Based on a previously conducted comprehensive analysis of statistical and analytical data available to the Department for Internal Control, Criminal Investigations and Professional Standards, an assessment of corruption risks was carried out in the Ministry of Interior and, in this regard, a Plan for Integrity of Workplaces in the Ministry of Interior 2023-2025 and an Action Plan for the Implementation of the Integrity Plan 2023-2025 were developed. This plan is a strategic anti-corruption document for building integrity that contains a set of measures to

prevent and eliminate the possibilities for the emergence and development of various forms of corrupt behaviour.

The Integrity Plan identifies six areas of the Ministry of Interior's operations that are most exposed to corrupt or other illegal behaviour that are subject to the scope of the Integrity Plan, namely:

- risks of abuse of official position by authorized officials from administrative services who are in direct contact with citizens in procedures for issuing personal documents, certificates, permits, etc.,
- risks of accepting bribes in the traffic and border police,
- risks of excessive use of force when exercising police powers,
- risks in the area of public procurement implementation, -
- risks in the area of human resources management,
- risks related to ethics, impartiality, dignity, protection of the reputation of the Ministry of Interior.

The Action Plan for the Implementation of the Integrity Plan provides for measures and activities that the competent organizational units will undertake in the next three years in order to reduce or suppress the identified risk. The Action Plan also provides for goals for the implementation of indicators in the next three years through which the level of implementation of the Integrity Plan will be monitored, i.e. a level of full traceability of the implemented measures and their implementation will be achieved, and thus the achieved results. The Integrity Plan for the Workplaces in the Ministry of Interior 2023-2025 and the Action Plan for the Implementation of the Integrity Plan 2023-2025 are published on the website of the Ministry of Interior.

In order to implement the measures envisaged in the Action Plan for the Implementation of the Integrity Plan 2023-2025, the Department for Internal Control, Criminal Investigations and Professional Standards conducted 10 trainings in 15 organizational units during 2024, attended by 196 participants, with the aim of strengthening the integrity of employees in administrative services, traffic police,

border police, the Section for the Implementation of Public Procurement, as well as reducing abuse of official position and authority and the legal application of police powers by police officers. During these trainings, special attention was paid to familiarizing employees with the provisions of the Code of Ethics, the Law on Whistleblower Protection, the standards of the integrity system, receiving gifts, conflict of interest, etc.

The Department for Internal Control, Criminal Investigations and Professional Standards, as the competent organizational unit, will monitor the implementation of the Action Plan for the Implementation of the Integrity Plan 2023-2025 and during 2025 will undertake the necessary measures and activities in order to implement the plan, and in order to achieve the ultimate goal, which is to strengthen the integrity of all employees in the Ministry of Interior and suppress corrupt behaviour within the ranks of the Ministry.

III.3. CONSISTENT COMPLIANCE WITH LEGAL REGULATIONS

A series of legal acts and by-laws in the Republic of North Macedonia contain and regulate the basic anti-corruption principles, such as legality, transparency, accountability, responsibility, fair treatment and impartiality in the exercise of official position and powers, starting from the highest act, the Constitution, through laws, all the way to ethical codes.

However, the most significant in this sense is the Law on Prevention of Corruption and Conflict of Interest, which regulates the measures and activities for preventing corruption in the exercise of public powers, official duty and policy, measures and activities for preventing conflicts of interest.

The Law on Whistleblower Protection also falls into the group of anti-corruption regulations, as it regulates the manner and procedure for protected reporting by which suspicion or knowledge is conveyed that a punishable or other illegal or impermissible act has been committed, is being committed or is likely to be committed that violates or threatens the public interest.

The Criminal Code of the Republic of North Macedonia devotes several articles covering criminal offenses with elements of corruption, such as: "Accepting a bribe", "Giving a bribe", "Giving a reward for unlawful influence", "Accepting a reward for unlawful influence", "Illegal acquisition and concealment of property", "Concealing the origin of disproportionately acquired property".

The Law on Public Procurement contains specific provisions for preventing and reporting corruption in the implementation of public procurement procedures, as well as for preventing and managing conflicts of interest, since it regulates one of the areas most susceptible to corruption.

The Law on Free Access to Public Information establishes the obligation of state institutions to proactively publish information and documents from their operations, as well as to make available free of charge all information of a public nature that will be requested from them.

At this point, it is important to mention the Law on Lobbying, the Electoral Code and the Law on Public Internal Financial Control.

III.4. RESPECTING TRANSPARENCY IN THE EMPLOYMENT AND PROMOTION PROCEDURE IN THE MINISTRY OF INTERIOR

Respecting transparency in the employment and promotion procedure in the Ministry of Interior, except for employments carried out on the basis of special provisions of the Law on Internal Affairs, is one of the priority objectives of this programme. The Law on Internal Affairs clearly states the need to respect the principle of transparency in the employment and promotion procedures in the Ministry. Employment without a public announcement in the Ministry is based only on jobs for which the act on systematization of jobs is based, due to the type and nature of the work tasks, as well as the special conditions under which they are performed.

The promotion procedure aims to enable employees in the Ministry to advance in their careers, i.e. move from lower to higher jobs. An employee in the Ministry may be promoted to another job that is higher in the Classification of Jobs than the previous job. Promotion shall be carried out in a transparent procedure, by publishing an internal

advertisement, based on the professional qualities and qualifications of the employee, his/her work abilities, the training completed during the employment relationship and the manner of performing work duties, regardless of gender, race, skin colour, political and religious beliefs and national origin. As an exception, the transparency of the procedure shall not apply to the promotion of employees to certain jobs. Results-based human resource management is a key element in the fight against corruption. Employees of the Ministry of Interior are required to meet high requirements regarding education, qualifications, reputation, personal and professional competencies. Continuous and specialized training of the employees of the Ministry of Interior for the jobs to which they are assigned is necessary. In this manner they can successfully perform their work obligations and ensure increased work efficiency. One of the most important ways for the employees to advance in their careers is to increase their level of competencies. This is most often achieved by attending professional and specialized training courses that can develop and improve general and specific competencies.

The evaluation of the employees in the Ministry of Interior should be an objective process through which the most successful employees will be rewarded. In this way, the employees will be motivated to achieve the desired characteristics of their work performance and behaviour, while at the same time encouraging them to take responsibility for maintaining a high level of personal and professional integrity.

In terms of human resources management, it is necessary to fully respect the principles of competitiveness, transparency and accountability; to increase control over the application of internal procedures for employment, deployment and promotion in order to properly implement these procedures, isolated from any influences (nepotism, cronyism and politicization); and to have clearly defined career and assessment system without favouring individuals.

With the adoption of the Law Amending the Law on Internal Affairs ("Official Gazette of the Republic of Macedonia" No. 89/22), a novelty was introduced regarding the conditions for employment in the Ministry of Interior, that is, a ban on membership in a political party was foreseen. The person - candidate for employment in the Ministry of Interior, in addition to other documents, must submit personally signed statement

confirming that he/she is not a member of a political party or a member of the authorities and bodies of a political party.

At the same time, this ban on membership in political parties has been established for all employees of the Ministry of Interior. The actions of an employee contrary to this ban are envisaged as a more serious case for disciplinary liability and grounds for initiating disciplinary procedures.

In this manner, the Ministry of Interior of the Republic of North Macedonia has firmly demonstrated its commitment to defactoring affiliation with a particular political party as a condition for employment or promotion in the Ministry of Interior.

In 2025, special attention will be paid to the professionalization, de-partization and depolitization of the employees in the Ministry and the police.

III.5. EDUCATION OF EMPLOYEES IN THE MINISTRY OF INTERIOR ON PROTECTED INTERNAL AND EXTERNAL REPORTING OF CORRUPTIVE BEHAVIOR

In the fight against corruption, a Law on Whistleblower Protection was adopted, which regulates protected internal and external reporting.

Whistleblowing mechanisms are a fundamental means of preventing, detecting and deterring corrupt activities, integrity violations and inappropriate behaviour. In the process of implementing the integrity system, it is of particular importance to revive the application of the Law on Whistleblowers, to activate channels for protecting the identity of people (employees of the Ministry of Interior or external persons) who wish to report cases of corruption to the Ministry of Interior.

The basic Law on Whistleblower Protection was adopted in 2015. It regulates the protected reporting, the rights of the whistleblowers, as well as the actions and duties of institutions, i.e. legal entities, regarding protected reporting and ensuring protection of whistleblowers. Amendments and supplements to the law were adopted in February 2018.

On the basis of this Law and on the basis of Article 2, paragraph 4 of the Rulebook on Protected Internal Reporting in the Public Sector Institutions and Article 2, paragraph 5 of the Rulebook on Protected External Reporting in the Public Sector Institutions, the Ministry of Interior has adopted Guidelines on the Procedure for Protected Internal and External Reporting in the Ministry. These Guidelines regulate and fully elaborate the procedure for protected internal and external reporting in the Ministry. The Minister of Interior, by a decision, appointed an authorized person for receiving reports submitted for the purposes of protected internal and external reporting in the Ministry.

In order to familiarize the employees of the Ministry of Interior with the significance of the Law on Whistleblowers as an important tool in the fight against corruption, the Department for Internal Control, Criminal Investigations and Professional Standards - Section for Integrity, Prevention of Corruption and Protection of Human Rights, continuously conducts educational workshops for authorized officials of the Ministry from various organizational units.

Ensuring confidentiality is key to protecting the reporting person at all stages of the procedure.

However, while the Law on Whistleblower Protection and its bylaws ensure confidentiality and protection of the identity of the reporting person, in practice there is no active application of the law. The fact that police officers rarely speak out about the inappropriate conduct of their colleagues is a reality and a sign of solidarity among colleagues. However, police officers should also be aware that it is very difficult to foster integrity in the police service without the efforts of all police officers who work professionally and with integrity and who want the entire organization to increase its integrity. Integrity cannot be strengthened if no one ever speaks out about the behaviours that undermine it, both at the level of the individual and organizational level.

III.6. OBLIGATION TO DECLARE ASSETS/INTERESTS BY THE EMPLOYEES IN THE MINISTRY

In order to monitor the property status and conflict of interests of the employees, the Law Amending the Law on Internal Affairs ("Official Gazette of the Republic of Macedonia" No. 89/22) provided for a new Article 70-b, which stipulates that:

Upon getting an employment in the Ministry, and no later than 30 days from the date of signing of an employment contract, employees in the Ministry shall submit a statement of assets and interests to the competent organizational unit in the Ministry, on a form prescribed by the State Commission for the Prevention of Corruption, in accordance with the law.

Employees in the Ministry are obliged to report any increase in their property, or the property of a member of their family, as well as any change in interests, to the competent organizational unit in the Ministry, on a form prescribed by the State Commission for the Prevention of Corruption, in accordance with the law and in a procedure and under conditions established by law within 30 days.

Employees in the Ministry are required to submit a statement of their assets and interests to the competent organizational unit in the Ministry within 30 days from the date of termination of the employment contract.

The responsibilities of the Department for Internal Control, Criminal Investigations and Professional Standards also include keeping records of the property and financial status of employees in the Ministry, controlling the accuracy of the data reported in the property list and controlling changes in the financial status. In this regard, the Department will continue to monitor the property status and conflict of interest of the employees in the Ministry of Interior in 2025.

III.7. CONTINUOUS AND SPECIALIZED TRAINING IN THE MINISTRY

The Ministry of Interior regularly conducts continuous and specialized training for employees with the aim of more successful performance of work tasks by the employee at the workplace to which he/she is assigned, performing work tasks professionally, politically neutrally and impartially.

The trainings are conducted for all employees of the Ministry, regardless of gender, national and social origin, political and religious affiliation, and financial and social status.

The organizational units responsible for preparing the annual training programs for the employees in the Ministry are obliged to plan appropriate training in the area of anti-corruption in the annual programmes, with special emphasis on the services that are most susceptible to corruption and corrupt behaviour.

This will enable the acquisition of knowledge and the ability to recognize corrupt behaviour within one's own ranks. In implementing these activities, the role of the managers is significant, as they will impose ethical and moral values through personal example that will influence the reduction of corruption.

The ability and expertise of the employees of the Ministry of Interior determines the capacity of the Ministry to deal with corruption, with a special emphasis on eliminating the causes that generate its occurrence and restoring trust in the institution.

Also, in the field of human rights protection, the Department continuously undertakes activities for professional development of its employees.

In 2025, it is planned to conduct training in the field of conducting criminal investigations in cooperation with the Public Prosecutor's Office for Prosecution of Organized Crime and Corruption and the Basic Criminal Court, performing internal control and control of professional standards, as well as implementing procedures for determining violations of work order and discipline, taking into account the amendments and supplements to the Collective Agreement of the Ministry of Interior, according to which the Department becomes an authorized proposer for initiating procedures for determining disciplinary liability.

III.8. PROMOTING COOPERATION BETWEEN STATE BODIES AND INSTITUTIONS RESPONSIBLE FOR PREVENTING AND FIGHTING CORRUPTION, NON-GOVERNMENTAL AND INTERNATIONAL ORGANIZATIONS

Inter-institutional cooperation through a joint and unified approach plays a major role in the fight against corruption and crime. In this regard, it is necessary to

strengthen the capacities of the relevant organizational units in the Ministry for the fight against corruption, for which the timely exchange of information with the Specialized Unit for the Prosecution of Criminal Acts Performed by Persons with Police Authorities and Members of the Prison Police Guard within the Public Prosecutor's Office for the Prosecution of Organized Crime and Corruption is of great importance. The Ministry develops cooperation with other state administration bodies and institutions for the fight against corruption and crime, such as: the Ombudsman, the Public Revenue Office, the Financial Intelligence Office, the Customs Administration, the Financial Police Office, the State Commission for the Prevention of Corruption. Through established cooperation with non-governmental organizations, the Association of Journalists of Macedonia, the Helsinki Committee for Human Rights, Macedonian Young Lawyers Association and other organizations and civic associations, the Ministry of Interior will implement projects in the field of combating corruption and protecting human rights and freedoms.

We must not overlook the fact that corruption goes beyond the national borders of the state and hence, no country can independently deal with this phenomenon without a joint and coordinated approach with the neighbours and with the countries of the international community.

The Department for Internal Control, Criminal Investigations and Professional Standards, as a competent organizational unit that undertakes measures and actions to detect and suppress criminal acts with elements of corruption and other forms of corrupt behaviour, continuously cooperates with similar services from other countries, international institutions and organizations and will develop the broadest possible international cooperation in all areas of fight against corruption.

In order to strengthen regional cooperation in the fight against corruption, an integrated approach to joint work including all forms of enhanced cooperation and exchange of information, as well as its further development, deepening and expansion, expert upgrading, the Ministry of Interior, represented by the Department for Internal Control, Criminal Investigations and Professional Standards, will be part of the Network for Enhanced Regional Cooperation of Internal Security Units (NERCISU), EPAC - European Partners Against Corruption, the Internal Criminal Investigation

Network established by the Swedish Police (ICIN), OSCE - Platform for Combating Corruption in Border Police, the Project: "Promoting Integrity and Good Governance in the Western Balkans" which is implemented in the Ministry of Interior under the auspices of the Centre for Integrity in the Défense Sector of the Republic of Norway (CIDS). It will also cooperate with the Regional Anti-Corruption Initiative RAI and the Centre for Security Cooperation for the Countries of South-Eastern Europe RACVIAC. The Department will particularly intensify cooperation with the ICITAP programme at the Embassy of the United States of America in the Republic of North Macedonia, with the support of which the Department of Internal Control, Criminal Investigations and Professional Standards became a member of the National Internal Affairs Investigators Association of the United States (NIAIA).

III.9. CONTROL MECHANISMS ON THE APPLICATION OF DISCRETIONARY POWERS BY POLICE OFFICERS

The protection of human rights and freedoms of all citizens is what every democratic society primarily expects from the police.

It is the obligation of all employees of the Police to act in accordance with the law, rules, regulations and professional standards applied in the Ministry of Interior when performing their work tasks. Every employee is required to respect the Code of Ethics for the Conduct of Employees, in order to ensure legality, professional and personal integrity, high morals and standards, efficiency, effectiveness, dedication and increased responsibility in the performance of work and work tasks, strengthening the integrity of the Ministry as a whole, as well as respecting human rights, through equal treatment and non-discrimination, without favouritism and without any personal interest, respecting the rights and dignity of others. Police officers should have the ability to recognize forms of illegal and unprofessional conduct and to oppose them, thus manifesting a high level of integrity in their work.

However, it happens that police officers, for various reasons and motives, when exercising their police powers act contrary to the law and exceed it, thereby violating

human rights and freedoms.

The risks of excessive use of physical force by police officers constitute a direct attack on human rights and freedoms guaranteed by the Constitution, laws and internationally ratified agreements. The police have police powers (including the possibility of using force) to temporarily deprive people of their liberty, to restrict the full enjoyment of their rights (e.g. to stop, question, detain and arrest them, seize their property, take fingerprints, photograph them and conduct body searches). In addition, in many cases, the police have discretion to decide whether and how to use these powers. However, police officers must always adhere to the rule of law in accordance with the best international standards and procedural rules and strategies prescribed in the applicable national laws. In carrying out their tasks, police officers must respect and protect human dignity and preserve and protect fundamental human rights, as well as civil and political rights.

The Department for Internal Control, Criminal Investigations and Professional Standards, when preparing the Integrity Plan of the Ministry of Interior, recognized the risk of excessive use of physical force when exercising police powers as one of the risks for unprofessional and illegal conduct of police officers. In order to combat this risk, the Action Plan envisaged the holding of training in this area, as well as an increased number of internal controls by the Department for Internal Control, Criminal Investigations and Professional Standards, as well as supervision by the management staff in each organizational unit where means of coercion are being used. In 2024, 156 police officers from 15 organizational units attended training courses provided for in the Action Plan for the Implementation of the Integrity Plan 2023-2025 in the area of excessive use of force, and the training courses in this area will continue in 2025.

In order to continuously improve the professional skills and strengthen the integrity of the employees of the Ministry, the Department is currently holding workshops presenting the Programme for Strengthening Police Integrity. Within the framework of the project "Promoting Integrity and Good Governance in the Western Balkans" which is being implemented in cooperation with the Centre for Integrity in the Defence Sector of the Kingdom of Norway (CIDS), 4 trainings were conducted on the topic: "Use of Police Force", which was attended by 92 participants.

It is certain that illegal occurrences in the work of the police encourage the creation of a negative image in society, which results in the citizens distrusting the work of the police.

The Department for Internal Control, Criminal Investigations and Professional Standards is a competent organizational unit in the Ministry of Interior of the Republic of North Macedonia that controls the legality of the work of police officers, as well as other employees of the Ministry, especially regarding the respect and protection of human rights and freedoms when performing police tasks and exercising police powers.

In every democratic society, besides the internal control over the work of the police, the external control over the police is another very important segment. It is exercised by: the Ombudsman, the Basic Public Prosecutor's Office for the Prosecution of Organized Crime and Corruption, where a specialized department has been established for the investigation and prosecution of criminal acts performed by persons with police authority and members of the prison police guard, the non-governmental sector, the public, etc.

III.10. TRANSPARENCY OF THE MINISTRY

The activities for improving the access to information should be directed towards regularly updating the website of the Ministry of Interior through publishing reports on achieved results and efficiency in operations, statistics, rulebooks and other information of interest to the public.

Transparency is implemented by enabling citizens to request and receive information about the work of the Ministry of Interior, i.e. through the obligation of the Ministry of Interior to submit and publish such data. Transparency in the work of the Ministry of Interior should apply to all issues within the scope of the institution's competences, which implies that the public should have easy access to policies, laws, strategic documents and information about the decisions and activities made, thus facilitating the information process for both citizens and the institution.

On the website of the Ministry of Interior, information regarding corruption and its prevention can be found, including: legal regulations related to building the

integrity system, protection of whistleblowers, conflict of interest, receiving gifts, as well as data on persons authorized by the Minister of Interior to receive reports from whistleblowers and to provide advice on integrity, conflict of interest and receiving gifts.

Transparency enables citizens to have insight into the work and policy-making of the Ministry, as well as communication between citizens. It requires mutual trust, patience and understanding that successful results will only be achieved if we provide evidence in accordance with the prescribed legal procedure.

The Law on Free Access to Public Information is the basic legal act on which transparency is based. In order to strengthen the openness and transparency of the institutions and to enable citizens and other institutions to exercise the right to free access to information, the Law on Free Access to Information provides for a series of obligations and duties for the institutions holders of information. In addition to prescribing an obligation for institutions to respond to requests for access to public information, the Law also contains provisions for proactive publication of information, i.e. for independent publication of information. In accordance with the Law on Free Access to Public Information, the Ministry of Interior has appointed an official for the exercise of the right to free access to public information.

Employees and citizens can report illegal, inappropriate and corrupt behaviour of Ministry's of Interior employees within 24 hours in the following manner:

- on the free telephone number 199;
- electronically to the following email addresses: prijavi_i_poplaki@moi.gov.mk и OVKKIPS@moi.gov.mk;
- at the premises of the Department for Internal Control, Criminal Investigations and Professional Standards at the Ministry of Interior or the nearest police station of general competence

III.11. IMPLEMENTATION OF INTERNAL CONTROLS BY THE DEPARTMENT FOR INTERNAL CONTROL, CRIMINAL INVESTIGATIONS AND PROFESSIONAL STANDARDS

Within its scope of competence, the Department for Internal Control, Criminal Investigations and Professional Standards (DICCIPS) performs internal control, which is actually the undertaking of activities by the employees of DICCIPS when acting upon a received oral or written complaint submitted by a citizen or other entity, in order to determine the truthfulness of the allegations made therein and to make a proposal for initiating a procedure to determine responsibility for violation of the work order and discipline, as well as to determine the material, professional, misdemeanour or criminal liability of the employees in all cases of their illegal actions.

The prevention and control of corruption can be supported by various monitoring and control mechanisms, such as the plans for internal inspection and internal and external control.

Internal control, as an important tool for detecting corrupt practices during control, assesses the efficiency and effectiveness of risk management processes, especially the efficiency of control mechanisms.

Assessing the adequacy and effectiveness of control mechanisms in terms of preventing and minimizing risks, internal control in its reports indicates the risks, i.e. the undesirable events that may be triggered as a result of inadequate and ineffective control mechanisms. The recommendations in the reports are most often aimed at strengthening existing control mechanisms or introducing new controls.

Effective internal controls and risk management reduce the vulnerability of an institution to corruption and enable optimal performance in the public interest. If implemented successfully, risk management will enable better decision-making, increased efficiency, better forecasting and optimization of available resources, strengthening trust in the governance system, and developing a positive organizational culture.

The purpose of these tools is not to detect existing corruption, but to assess the risk that some form of illegal or unethical behaviour may occur in the course of the work.

In this regard, it is not enough for the Ministry of Interior to advocate zero tolerance towards corruption, but all employees should as well be well acquainted with the integrity policy, the legal framework, their obligations and duties, as well as the

disciplinary, criminal and other procedures that may be initiated and the possible consequences. Hence, when exercising their powers and duties, officials should respect the principles of legality, equality and publicity, the ethical norms and the professional standards.

Any form of corrupt, inappropriate, unethical or immoral behaviour should be detected by the highest management structures and sanctioned.

The strong commitment to implementing the management integrity policy will only be operationalized if such a policy is applied equally to everyone, regardless of their position, as well as regardless of the type of violation in question.

Mechanisms for the detection and independent investigation of cases of unprofessional conduct, such as corruption, are an essential part of an ethical infrastructure. It is essential that there are robust procedures and resources for monitoring, reporting and investigating breaches of service rules, as well as proportionate administrative or disciplinary sanctions to discourage corrupt behaviour.

III.12. DIGITALIZATION OF THE WORK PROCESSES IN THE MINISTRY OF INTERIOR

Digitalization as a priority implies achieving a high level of modernization of the country through the use of information technologies in the private and public sectors. Digital systems enable real-time data analysis, which leads to better strategic decision-making.

The digitalization of some of the processes under the jurisdiction and within the framework of the Ministry of Interior improves operational efficiency, speeds up processes, reduces human contact and opportunities for corruption, enables high transparency at all levels, improves interaction between participants, and facilitates controls, data analysis, and the detection of corruption.

The digitalization of the work processes can lead to enhanced accountability and provide the opportunity for subsequent control over the use of discretionary powers, as well as their reduction. By automating or computerizing working processes, efficiency

and effectiveness can be improved and much of the opportunity for corruption can be removed.

The Ministry of Interior will continue to strive for the highest level of automation of work processes and to constantly review the functionality of computer applications in use.

Public sector institutions should also follow the rules and regulations for efficient archiving of submitted documents, which is also crucial for the accountability of the institution towards citizens and their requests. Correct record keeping is essential for tracking down corruption. Public access to information requires the need for a good records management system in accordance with the Procedure for Office and Archives Operations.

In this regard, in cooperation with the ICITAP program at the US Embassy in Skopje, the Department for Internal Control, Criminal Investigations and Professional Standards will conduct complete digitalization of the work processes in 2025 in order to facilitate the access of the citizens or employees who wish to report illegal and unprofessional behaviour by employees in the Ministry.

IV. OBLIGATION TO IMPLEMENT THE ANTI-CORRUPTION PROGRAMME

The implementation of the Anti-Corruption Programme is an obligation of all heads of organizational units and should contribute to reducing the level of corruption, strengthening the integrity, transparency and accountability of the Ministry. All employees should contribute to a consistent, uncompromising and non-selective fight against corruption.

The Action Plan for the Implementation of the Anti-Corruption Programme clearly defines the competent organizational units and their tasks with which the common goal of reducing corruption to the lowest level would be achieved.

Anti-Corruption Programme of the Ministry of Interior becomes part of the Annual Training Programme with a clear timeframe for implementation. Therefore, it is necessary for each organizational unit responsible for implementing the obligations of

the Anti-Corruption Programme to prepare a report with activities and a timeframe for their implementation in the current year.

The Department for Internal Control, Criminal Investigations and Professional Standards, through an established control mechanism, is responsible for monitoring the implementation of the Anti-Corruption Programme and the activities set out in the Action Plan, which is an integral part of it.



MINISTER OF INTERIOR
Panche Tochkovski