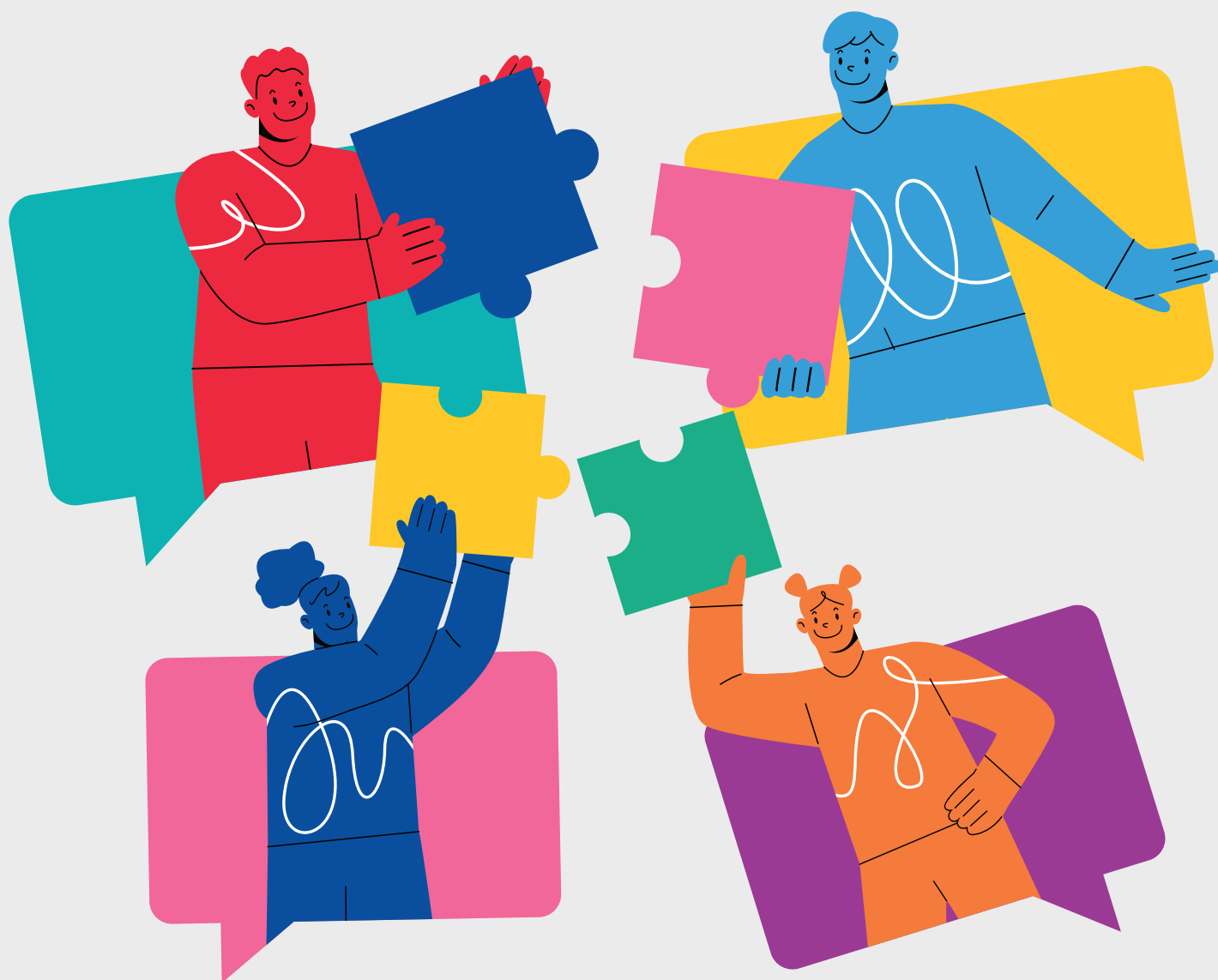




Guide for Building Integrity

Montenegro's Experience in Assessing the
Implementation of Anti-Corruption Measures
in the Public Sector

November 2025



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The development of the Guide for Building Integrity was supported under the project “Zero Tolerance for Corruption: Strengthening Integrity, Transparency, and Accountability in Public Administration in Montenegro”, implemented by the United Nations Development Programme (UNDP), with support from the Government of the Republic of Korea through UNDP Seoul Policy Centre’s SDG Partnership Programme.

I Setting the Scene: Integrity in Action

Preventing corruption and strengthening integrity in the public sector are essential for building public trust and improving the quality of institutional work. Success in this area depends not only on adopting anti-corruption policies, but also on their **practical implementation and systematic monitoring** through measurable and transparent processes.

The **Guide for Building Integrity** (hereinafter: the Guide) provides a practical overview of how Montenegro, drawing on international experience, developed and applied a new tool in the fight against corruption — the **Methodology for Assessing the Implementation of Anti-Corruption Measures in the Public Sector** (hereinafter: the Methodology).

Several key results, summarised below, offer important insights that shape the content of this Guide:

- ✓ From 2021-2025, the Agency for the Prevention of Corruption (APC) assessed how **130 out of 149 institutions, across four of ten public sector systems**, work to prevent corruption¹. On average, a moderate level of performance was achieved across sectors (more details are provided later in the Guide).
- ✓ More than **80% of institutions within each sector participated in the assessment** of anti-corruption measures applied, indicating strong institutional motivation for being part of the process.²
- ✓ The APC issued **2,276 individual recommendations** to support institutional improvement. Within the four assessed sectors, 342 activities were carried out, and numerous documents adopted to enhance **integrity, ethics, and anti-corruption practices** — demonstrating the tangible impact of the Methodology. Monitoring and analysing the implementation of these recommendations is a priority for the APC, with ongoing follow-up already underway in the public administration and social and child protection systems.
- ✓ **Montenegro's model has gained international recognition.** At the 10th Conference of the States Parties to the UN Convention against Corruption³, the Methodology was presented as an innovative approach to assessing integrity in the public sector. Through the exchange of experiences with countries in the region and beyond, Montenegro **contributes to broader global dialogue on corruption prevention and integrity strengthening**.⁴

¹ State administration, social and child protection, justice (judiciary and prosecution) and local self-government units

² In the state administration sector, **32 of 40 institutions** participated in the assessment; in the social and child protection sector, **32 of 39**; in the justice sector, **all 45 institutions**; in the local self-government sector, **21 of 25**; and in the health sector, **30 of 37**.

³ More information is available at: <https://www.undp.org/cnr/montenegro/news/crna-gora-u-atlanti-predstavila-metodologiju-za-procjenu-primjene-antikorupcijskih-mjera>

⁴ More information is available at: <https://www.antikorupcija.me/me/integritet/novosti/2505141246-crna-gora-podijelila-svoja-iskustva-jacanju-institucionalnog-integriteta-medjunarodnoj-radionici-undp-/>

Purpose and Aim of the Guide

The Guide is designed as a **practical tool** for:

- ➔ institutions that plan to develop a system for assessing institutional integrity, that is, the application of anti-corruption measures,
- ➔ anti-corruption agencies/institutions with a mandate to develop tools for corruption prevention,
- ➔ international organisations, bilateral donors, and development partners that provide technical and financial support for establishing and strengthening integrity mechanisms in the public sector.

Its aim is to make Montenegro's experience in establishing a system for assessing the implementation of anti-corruption measures – **grounded on domestic expertise and inspired by international practices** – available to countries seeking to develop similar mechanisms.

Structure of the Guide

The Guide outlines the development and application of the Methodology — from *the initial idea* and definition of the approach, through *practical implementation and assessment of results*, to identified *challenges and lessons learned*. A simplified overview of these phases is presented below, with each phase explored in detail in the sections that follow.

Figure 1: Phases of developing and applying the Methodology



II Context for Developing the Assessment Methodology

The Methodology was developed as a support tool for the existing integrity assessment mechanisms in the public sector, implemented by the APC.⁵ Although public authorities themselves prepare integrity plans — documents through which they identify corruption risks and measures to mitigate them — the analysis of their implementation is often subjective and remains confined within a single institution.



An **Integrity Plan** is a strategic document that shows how a public authority identifies and manages corruption risks. Its purpose is to strengthen the quality of work, professionalism, and ethical culture within institutions. The plan must be publicly available, and the public authority is required to review and update it every two years.

To address this need, a **model for external assessment** was developed, providing a more objective insight into the actual application of anti-corruption measures, including integrity plans. The legal basis for this approach lies in the legislation,⁶ which assigns the APC the responsibility to monitor the development and implementation of integrity plans, provide recommendations, and assess their efficiency and effectiveness

The Methodology enables the APC to assess the extent to which the objectives defined in integrity plans have been achieved, whether the results have led to meaningful changes in practice, and to formulate recommendations for strengthening corruption prevention.

In this way, an evidence-based mechanism has been established to support the development of higher-quality integrity plans and the monitoring and assessment of their implementation.

2.1. From the Republic of Korea to Montenegro: Knowledge Transfer

In developing the Methodology, the APC drew inspiration from the experience of the Republic of Korea, specifically from the *Assessment of Anti-Corruption Initiatives*,⁷ developed in 2002 by the Anti-Corruption and Civil Rights Commission (ACRC).⁸ This methodological tool has, over the long term, served as a foundation for assessing anti-corruption policies and measures within the Korean public sector.

5 More information available at: <https://www.antikorupcija.me/me/integritet/izvjestaji/>

6 Official Gazette of Montenegro 54/24 of 11 June 2024 - Law on the Prevention of Corruption <https://www.gov.me/dokumenta/0d38167d-9e9f-4f81-bc07-771ea612bf1e>

7 For more details, see Integrity Efforts Assessment: <https://www.undp.org/policy-centre/seoul/publications/introduction-koreas-anti-corruption-initiative-assessment>

8 Anti-corruption and Civil Rights Commission (ACRC)



Adapting the international model to the local context

"The Korean *Assessment of Anti-Corruption Initiatives* served as an inspiration - first as a concept, after which the model was adapted to the Montenegrin context."

(co-author of the *Methodology*, interview, May 2025)

The Korean experience as inspiration

"The model from the Republic of Korea showed that an assessment does not have to be only a formality, but can also serve as a tool for change. We wanted to bring that principle into our own context as well."

(APC, interview, April 2025)



The model of the Republic of Korea includes:

- self-assessment by institutions,
- assessment by an independent agency (ACRC) and independent external experts,
- public ranking, recognition, and awarding of institutions.⁹

The Korean model functions as **a tool for learning and improvement, which is the source of its particular value**. The assessment it provides is not limited to evaluating the situation through institutional rankings; it also creates space for dialogue and consultation, enabling institutions to receive concrete recommendations on how to strengthen their internal mechanisms for preventing corruption. **The Montenegrin model has adopted this same value.**

Assessment as a tool for progress, not for ranking

"We do not only seek to determine whether certain measures exist, but whether they are effective and applied in practice. The ultimate goal of our system is not naming and ranking, but helping institutions improve. That is why we provide them with feedback and recommendations for the next steps."

(Interview with ACRC, May 2025)



Montenegro adopted the basic structure of the Korean model — **self-assessment, external assessment, and quantitative scoring**¹⁰ — as well as a set of **qualitative indicators and the development of recommendations**, and applied it in line with its normative and institutional framework.

Integrity Manager — a person appointed by the head of the institution, responsible for developing and implementing the Integrity Plan. All employees are required to provide him/her with the data and information needed to ensure that the plan is of high quality and applicable in practice.



⁹ The highest-ranked institutions receive public recognition (e.g., announcements at national events), participate in training programmes and exchanges of experience, and often gain additional opportunities to represent the country in international initiatives.

¹⁰ The Korean IEA model recommends that countries interested in adopting a similar methodology begin with a few simple criteria supported by quantitative indicators.

In applying the process in Montenegro, the starting points were:

- ✓ assessment based on **legal obligations**;
- ✓ a formalised role of integrity managers as **coordinators of** assessments within institutions;
- ✓ a strengthened **participatory approach**, through the active involvement of integrity managers in **adapting the Methodology** and reviewing preliminary findings, which contributed to transparency and a stronger sense of accountability in the process.

2.2. Montenegro's Tool in the Fight Against Corruption – The Methodology in Practice

The Methodology was developed as a practical tool that helps institutions examine their policies and practices for preventing corruption in their day-to-day work.

It is therefore not intended solely to assess whether certain policies exist, but focuses on their **application and effectiveness**. By combining **quantitative indicators** (whether anti-corruption policies exist) with **qualitative insights** (whether these policies have an effect), the focus shifts from form to substance.

Particular attention in the process is devoted to **organisational culture**. In line with the Methodology, the assessment of the implementation of anti-corruption measures covers not only legal and procedural frameworks, but also the values promoted by the institution, **the way decisions are made, leadership behaviours, attitudes toward performance, and the level of employees' trust in the system**.

This approach enables institutions to:

- ✓ **define their objectives and ways to achieve them more clearly,**
- ✓ **recognise good practices and identify weaknesses,**
- ✓ **strengthen professionalism and accountability, and**
- ✓ **develop an internal culture in which integrity and transparency are part of everyday practice rather than a formal obligation.**

The Montenegrin model is therefore positioned not as a system that “names and shames,” but as an instrument that builds. Instead of control aimed at sanctioning, the focus is on supporting institutions — through a clear assessment of the situation, recommendations, and motivation for improvement.

2.3. Scope and Structure of the Methodology

The Methodology can be applied to all public authorities within the meaning of Article 3 of the Law on the Prevention of Corruption. This includes **state authorities, state administration authorities, local self-government authorities, public institutions and companies, as well as other legal entities that exercise public powers or are majority-owned by the state or municipality.**¹¹

All public authorities are grouped into ten sectors, and the implementation of the Methodology takes place **by sector and in phases**, in line with available human and administrative capacities. To date, it has been applied in four sectors: state administration, social and child protection, local self-government, and the justice system (courts and prosecutors).¹² It is planned to apply it in the coming period in the remaining six sectors: health¹³, education, state- and municipality-owned companies, independent and regulatory bodies, and culture.

Figure 2: Timeline of Applying the Methodology Across Four Public Sectors



11 Article 3: A public official, within the meaning of this law, is an elected, appointed or designated person in a state authority, an authority of state administration, a judicial authority, a local self-government authority, a local administration authority, an independent body, a regulatory body, a public institution, a company, or a legal entity that exercises public powers or performs activities of public interest, or is in state ownership (hereinafter: public authority), as well as a person whose election, appointment or designation requires the consent of a public authority, regardless of whether the function is permanent or compensated. Notaries, public bailiffs, and bankruptcy administrators are also considered public officials within the meaning of paragraph 1 of this Article. State ownership, within the meaning of this law, refers to any share in a company in which the state, the Capital City, the Old Royal Capital, or a municipality holds at least 33% of the capital.

12 More information is available at: <https://www.undp.org/cnr/montenegro/publications/report-on-the-assessment-of-anti-corruption-measures-for-the-government-sector-and-other-government-organs> ; <https://www.undp.org/cnr/montenegro/publications/report-on-the-assessment-of-anti-corruption-measures-for-the-social-and-child-protection-system> ; <https://www.undp.org/cnr/montenegro/publications/report-on-the-assessment-of-anti-corruption-measures-for-the-local-self-government-units> ; Report on the assessment of the implementation of anti-corruption measures for the Judiciary system, subsystem Judiciary | United Nations Development Programme , <https://www.undp.org/cnr/montenegro/publications/izvjestaj-o-procjeni-primjene-antikorupcijas-mjera-za-sistem-pravosude-podsistem-tuzilastvo>

13 In May 2025, the APC, in cooperation with the United Nations Development Programme (UNDP), organised a workshop for Integrity Managers from the health sector, aimed at further strengthening corruption prevention mechanisms in this socially important sector. At the workshop, a draft of the new Methodology for Assessing the Implementation of Anti-Corruption Measures was presented, as well as a specialised web application that will enhance the practical implementation of the Methodology. These tools will enable a more precise and objective assessment of the quality of anti-corruption activities in health institutions. By the end of 2025, the final results for the health sector will be presented.

The Methodology is designed as an easy-to-apply tool and consists of clearly defined categories, criteria, indicators, and means of verification (evidence). The assessment is based on a combination of quantitative and qualitative evaluation. The indicators relate to the fulfilment of **legal obligations, internal procedures, education, transparency, and the quality of the Integrity Plan**. The Methodology enables authorities to conduct a self-assessment, identify their strengths and weaknesses, after which the APC provides an external counterbalance to the self-assessment by scoring the responses based on evidence. In this way, the effect of implementing anti-corruption measures is examined — not only the measures listed in the Integrity Plan, but also other anti-corruption measures that may be established at the institutional level and that demonstrate proactivity.

In the context of the implementation of these measures, progress should be reflected through:

- ✓ increased transparency in the work of the institution and reduced discretionary powers,
- ✓ improved efficiency of supervision and control mechanisms, including the establishment of mechanisms for detecting and reporting corruption and other irregularities,
- ✓ the establishment and strengthening of an ethical culture, as well as improvements in institutional performance (including service delivery to users).

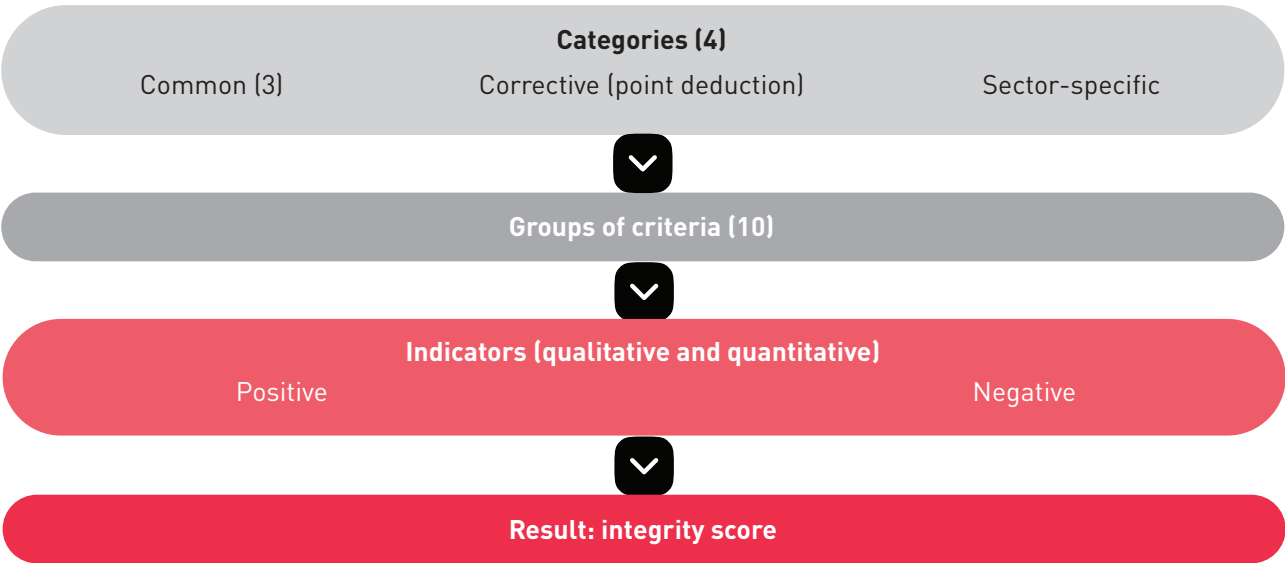
The assessment of the implementation of anti-corruption measures is carried out across three categories, based on the legal obligations applicable to all public authorities, and further broken down into criteria and indicators:

1. *Establishing conditions for the application of anti-corruption regulations;*
2. *Strengthening the institutional framework for preventing corruption;*
3. *Strengthening ethical culture.*

The fourth category refers to **indicators whose fulfilment results in the deduction of points from a public authority**. For example, if negative findings are identified during the assessment — such as Administrative Court judgments due to administrative silence, adverse opinions of the State Audit Institution (SAI), or confirmed cases of corruption — **points may be deducted from the institution**. These indicators point to situations that directly undermine institutional integrity, such as repeated irregularities, failure to meet legal obligations, or other serious shortcomings in the implementation of anti-corruption measures. This ensures that the scoring system assesses not only the formal existence of documents and procedures, but also the **real risks and weaknesses that may undermine institutional integrity**.

In particularly specific sectors, such as the social and child protection system, an additional, fifth category has been developed, which measures the implementation of anti-corruption policies falling within the remit of these institutions.

Table 1: Elements of the Methodology



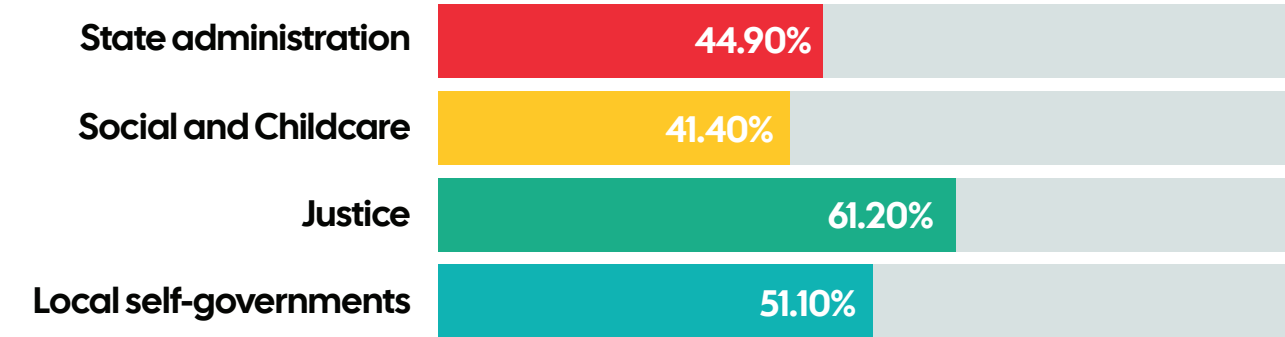
The total number of points achieved across the categories is converted into the **Performance Index of Anti-Corruption Measures Implementation** (presented as the result in Table 2), according to the following thresholds:

Table 2: Index of the effectiveness of the implementation of anti-corruption measures

Performance index	Description of institutional performance
0–25%	Minimal performance
25–50%	Low performance
50–75%	Moderate performance
75–90%	High performance
>90%	Very high performance

For illustration, the final indices in the assessed sectors are as follows:

Chart 1: Performance Indices of Anti-Corruption Measures Implementation, by Sector



To ensure a successful assessment of anti-corruption measures, the application of the Methodology is based on:

- ✓ A. Analysis of Integrity Plans, reports on their implementation, and the APC's assessment of their effectiveness and efficiency;
- ✓ B. Collection of data and evidence from institutions, structured according to predefined categories, criteria, and indicators;
- ✓ C. Self-assessment conducted by authorities in accordance with the Methodology;
- ✓ D. Assessment and scoring by the APC, using the same Methodology;
- ✓ E. Preparation of individual reports for all authorities, as well as a sector report containing the assessment and recommendations for strengthening integrity;
- ✓ F. Ranking of institutions within the system and public presentation of results, which encourages inter-institutional learning and motivates further anti-corruption work.

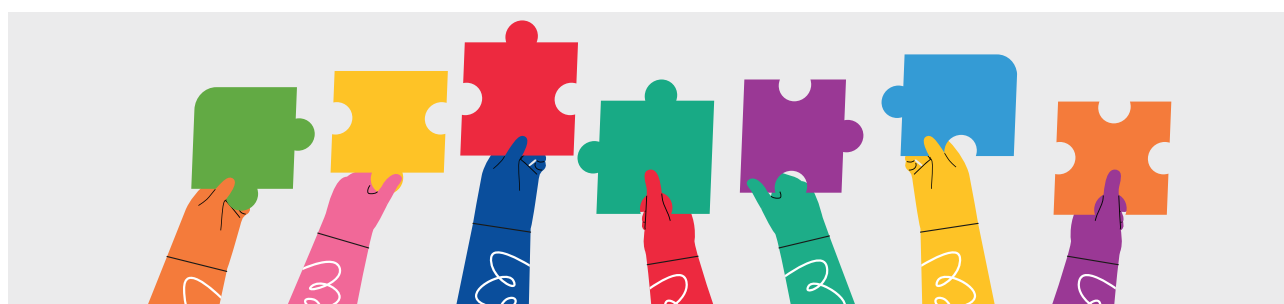
These steps are described in more detail in the following chapter.

2.4. Seven Steps for Applying the Methodology

The establishment of a national integrity assessment system in Montenegro was a multi-phase process requiring coordination among multiple actors, institutional support, and the adaptation of international experience to the local context. Inspired by Korean practice, the process began in 2021 through a partnership between the APC, UNDP in Montenegro, the UNDP Seoul Policy Centre, and the Government of the Republic of Korea.

01. Piloting the Assessment of Anti-Corruption Measures – Developing the Methodology

When drafting the Methodology, the criteria were defined on the basis of anti-corruption legislation, sector-specific regulations, international best practices, and analyses of Integrity Plans and their implementation. Based on this, indicators were selected for each category and point values assigned to each indicator, taking into account their importance and complexity. The assessment was piloted in 2021 in two systems — state administration and social and child protection.



The pilot phase allowed for the identification of challenges and the refinement of the approach, while in subsequent assessments of other systems the core principles of the Methodology remained the same — grounded in the legal obligations of institutions and allowing for comparative analysis across sectors. The APC determines which system will be assessed based on analyses of Integrity Plans, their effectiveness, and findings of other authorities, as well as inputs from civil society, international organisations, and the media.

Although institutional participation was not legally obligatory, the response rate was high thanks to **active communication and support from the APC**. Institutions recognised the opportunity to demonstrate results, promote good practices and strengthen their reputation. Positive **recognition of successful examples and the public visibility of the process created healthy competition** and further motivated institutions to improve their procedures and documentation.

02. Inclusiveness as a Guiding Principle in Cooperation with Integrity Managers

For each sector assessed over the past four years,¹⁴ dedicated workshops were organised for Integrity Managers, who serve as coordinators and contact points in the assessment process. At these workshops, the APC presents the draft Methodology, the approach to collecting evidence, the scoring system, and the reporting process, and initiates a dialogue on expectations within the assessment.

During the workshops, participants actively exchange experiences and propose practical solutions to challenges in implementing Integrity Plans, ultimately contributing to sector-level adaptation of the Methodology. This enhanced its practical applicability and improved institutional understanding of the process.

The involvement of institutions in all phases of the process strengthened **confidence in the assessment results, improved communication** between institutions and the APC, and created **a foundation for a lasting culture of accountability and transparency**.



Workshops with Integrity Managers



On institutional inclusiveness

"From the very beginning, we were involved — not only as participants, but as someone whose views were valued."

"Communication with the APC was excellent throughout the entire process. We could always obtain clarification or guidance, which was extremely helpful for us, especially as this was our first time going through such an assessment model."

"It was important that the APC did not simply request data, but guided us through the process. We felt a sense of partnership and a shared goal—to improve the system, not just to fill out charts."

(Integrity Managers, Interviews, May 2025)



Workshops and Finalisation of the Methodology

"The process was very well organised — from the initial workshop to the submission of evidence. It was clear what needed to be done at each stage, when to submit evidence, and when to expect feedback. This created a sense that we were participating in something serious and useful, not just preparing another report."

"This process helped us strengthen integrity within the institution, and also understand how important Integrity Managers are as a link between management and staff."

(Integrity Managers, Interviews, May 2025)

03. Self-Assessment by Public Authorities

The self-assessment process within institutions was coordinated by Integrity Managers, in continuous communication with the APC. In practice, they often initiated the process — identifying needs, organising internal meetings, guiding staff in gathering the required documentation, and encouraging the adoption of missing acts. Their role was not only technical but also motivational, as they were frequently **the drivers of concrete improvements within institutions**.



The Role of Integrity Managers from the APC's Perspective

"The role of Integrity Managers was essential — without them, there would have been neither technical nor organisational coordination. They were the ones who made the process real, not just a formality."

(APC representative, interview, April 2025)

During the pilot phase, institutions began the self-assessment process by completing a detailed questionnaire, which had been methodologically aligned at the workshops, taking into account the specificities of each sector. In later phases, the questionnaire was digitised and improved through the web application www.integritet.me.

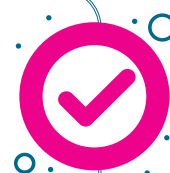
The assessment is based on a combination of **quantitative** and **qualitative** indicators. Quantitative indicators reflect the existence and scope of certain mechanisms (e.g., appointment of Integrity Managers, preparation of an Integrity Plan, or publication of annual reports), while qualitative indicators assess their **quality, effectiveness, and actual application in practice** — for example, whether procedures are clearly defined and implemented consistently. Quantitative indicators therefore measure the structure of the system, while qualitative indicators measure its functionality and performance.

In practice, completing the questionnaire proved to be more than an administrative task. **Through the questions, institutions identified specific shortcomings in documentation, procedures, and practice**, which often led them to **react promptly during the self-assessment period — preparing missing internal acts** or carrying out additional activities. This marked the beginning of observable, immediate **effects of the Methodology**.

Self-Assessment as a Driver of Change

“The very process of completing the questionnaire encouraged institutions to re-examine and systematise their existing procedures. In some cases, internal regulations were developed precisely because the questionnaire revealed that they were missing.”

(Integrity Managers, interview, May 2025)



The application of the Methodology lasted, on average, two months per sector (Figure 2). During this period, institutions adopted new procedures regulating recruitment, whistleblower reporting, and conflict-of-interest prevention; developed internal procedure manuals and risk registers; and introduced a wide range of new documents and processes — including the appointment of responsible officers, publication of information, and new practices that strengthen corruption prevention.

These immediate effects demonstrate the strong motivating role of the Methodology. This was particularly evident in the justice sector, where — according to APC data — judicial institutions adopted and implemented 227 new documents or activities within just one month after being introduced to the Methodology and the assessment process.¹⁵

04. Submitting Means of Verification

The self-assessment conducted by public authorities is accompanied by the submission of evidence supporting specific claims. Documentation is submitted in electronic form, while the APC also uses other publicly available sources of information for additional verification, such as official registries, reports of state authorities, or civil society organisations.

In the initial phase of applying the Methodology, evidence demonstrating the fulfilment of indicators was submitted via USB drives. For the purposes of the assessment in the justice sector, however, the online platform www.integritet.me was developed, and it was fully finalised during the current assessment of the health sector. Thanks to this platform, institutions now submit their evidence exclusively in electronic form, directly through the system, which has significantly improved the efficiency of the process.

¹⁵ Source: Agency for the Prevention of Corruption, “Methodology for Assessment of Implementation of Anti-Corruption Measures”, Marko Škerović, June 2025, <https://kmp.respaweb.eu/materials/169/methodology-for-assessment-of-implementation-of-anti-corruption-measures-rn>

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05. APC Verification and Preparation of Individual Reports for Public Authorities

After the self-assessment has been completed and evidence submitted, the APC conducts an objective assessment using clearly defined scoring criteria and prepares a report containing the findings and scores. An indicator may receive 0 points if it is determined that it has not been met, meaning the authority did not provide evidence and verification could not be achieved through other sources. If the indicator is met — either because the authority submitted evidence or verification was confirmed using other sources — the score may range from 0.5 to 5.5 points, depending on the quality and scope of fulfilment. The total number of points for a given criterion depends on the number of indicators applied within the specific sector.

Example of criteria, indicators, and scoring system from the Methodology for the Health Sector

Category 1: Creating Conditions for Implementing Anti-Corruption Regulations				
criteria	Indicator	Total points	Points awarded to the authority	Means of verification
1.1. Establishing an Internal Mechanism for Managing Corruption Risks	1.1.1. Integrity Manager appointed	1		Decision on the appointment of the Integrity Manager
	1.1.2. Integrity Plan developed in accordance with the Law on the Prevention of Corruption and the Rules for Developing and Implementing the Integrity Plan:	4		Scanned and stamped decision adopting the Integrity Plan, including the date of adoption
	Integrity Plan developed - 1 point	1		Print screen of the Integrity Plan in the web application
	*If the adopted Integrity Plan is also entered into the APC's web application, the authority receives an additional 1 point.	1		Verification by the Agency

Public authorities receive a certain number of points for each category. The first three categories are scored for all authorities. The sum of points within each category forms the overall result, which reflects the percentage of performance in implementing anti-corruption measures. A higher score indicates a higher level of implementation and effectiveness of anti-corruption measures (see Table 2: Performance Index of Anti-Corruption Measures Implementation). A separate fourth category is also defined, containing indicators whose fulfilment results in the deduction of points (negative indicators). In addition, there is a sector-specific category that does not apply to all sectors (see Chapter 2.3 for more on mandatory categories and the sector-specific category).

Shown are some of the negative indicators from the Methodology for the health sector

4. Indicators Whose Fulfilment Leads to Point Deduction for the Public Authority

Indicator	Total points that may be deducted	Points deducted from the authority	Means of verification
4.1 Final court judgments issued against the authority since 1 January of the current year (all cases except those listed under Indicator 4.3) *If the number of final court judgments against the authority is fewer than three, 2 points are deducted.	-3		Report of the authority or a letter signed by the head of the authority Report of the Protector of Property and Legal Interests of Montenegro
4.2 The Agency for Personal Data Protection and Free Access to Information has, since 1 January of the current year, identified irregularities within the authority through supervisory inspection (related to the preparation and updating of the Access to Information Guide, proactive publication of information, and submission of acts and data for the information system on access to information). *If there is evidence that the authority has implemented the issued recommendations, the number of points deducted may be reduced, depending on the level of fulfilment.	-2		Notification from the public authority / Notification from the Agency for Personal Data Protection and Free Access to Information

After the submitted means of verification are assessed and points assigned — that is, after the quantitative assessment is completed — a qualitative assessment follows, with the purpose of explaining and supplementing the results of the quantitative assessment.¹⁶

For the qualitative assessment, the APC also uses the responses that public authorities provided in the APC's Questionnaire for Assessing the Effectiveness and Efficiency of the Integrity Plan, which relate to actual practice and correspond to the indicators.

Based on the combined quantitative and qualitative findings, the APC prepares a draft report that presents the achieved results, scores by category, and recommendations for improving performance.

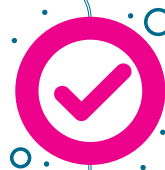
06. Additional Comments from Public Authorities on Individual Reports

Institutions are given the opportunity to provide comments on the APC's draft report, which encourages dialogue and an inclusive process. This feedback mechanism has ensured **transparency and allowed for the correction of any potential omissions** in the assessment process.

Building Trust through Dialogue

"Institutions had the opportunity to respond to the APC's findings, which is important for building trust in the process. The dialogue was constructive."

(Co-author of the Methodology, interview, May 2025)



¹⁶ In the Republic of Korea, the quantitative assessment is carried out by ACRC's internal staff, while the qualitative assessment is conducted by independent external experts (e.g. university professors, researchers, representatives of civil society). This approach ensures a balance between expertise, objectivity, and the overall comprehensiveness of the assessment.



07. Preparing the Final Sector Report and Presenting Key Findings and Recommendations

To finalize the assessment, the APC prepares **a sector report** that provides an overview of the entire process carried out within a given system, the performance results according to the Anti-Corruption Measures Implementation Index, and a detailed analysis by categories and indicators. The report includes **the ranking of institutions** based on the number of points

scored, **key findings, as well as recommendations** for improving performance. The annexes of the report contain summary tables with the scores for each institution, as well as lists of the documents adopted and activities carried out during the process. This enables transparent comparison among institutions and allows for tracking the immediate effects of applying the Methodology. The final score for each public authority includes, in addition to the quantitative assessment, an explanation of the rating and recommendations in relation to the result obtained.

III Lessons Learned

The application of the Methodology brings not only changes to procedures, but also to organisational culture — shifting institutions toward proactive planning in corruption prevention and toward building mutual trust and accountability. This process requires time, patience, and continuous learning. The challenges encountered are viewed as lessons learned, including:

Limited Understanding of the Purpose of Integrity Assessment

In many institutions, a limited understanding of the role and importance of integrity assessment was observed.



Limited Understanding of the Purpose of Integrity Assessment

In many institutions, a limited understanding of the role and importance of integrity assessment was observed.

“The concept of integrity itself — and the purpose of self-assessment — was not well understood among staff, which slowed down the initial phases of the process.” (Integrity Manager, interview, May 2025)

“At the beginning, it wasn’t clear what this assessment was for. Many thought it was just another administrative obligation.” (Integrity Manager, interview, May 2025)

In addition, the capacity to collect, organise, and document the required data and acts varied considerably. Smaller institutions, particularly at the local level, lacked both the technical and human resources needed to meet all requirements within the given timeframe. For this reason, deadlines were extended by the APC to ensure that all questions could be addressed and that institutions could submit the evidence necessary for verifying points.

Lesson learned:

Introducing the Methodology works best when **clear communication about the purpose and benefits of the process is** provided from the outset, along with **additional support for institutions with limited capacities**. Through deadline extensions, workshops, and ongoing communication, the APC ensured that the process remained inclusive and supportive.

Limited Inter-Sectoral Coordination

Despite the APC's coordinating role, horizontal coordination among departments and sectors within individual institutions proved challenging. Preparing responses to the questionnaire often required contributions from several organisational units, which was not always easy to organise.

"Not everyone in the institution is equally involved. Sometimes the Integrity Manager is left alone trying to gather all the information."

(Co-author of the Methodology, interview, May 2025)



Lesson learned:

It is necessary **strengthen horizontal communication within institutions** by formally involving all organisational units in the process of self-assessment and verification of evidence. The implementation of the Methodology showed that many institutions lack effective internal coordination. For future cycles, it is recommended to develop a more precise model and clear guidance for forming an internal team that would consolidate the work of all organisational units involved in the integrity assessment process.

Lack of Consistency in Documentation/Evidence

During the assessment, significant differences were observed in how institutions interpreted the questionnaire and submitted evidence. The workshops helped resolve uncertainties, and the APC was available for any additional clarification. Although the Methodology provides examples and types of acceptable evidence, some institutions submitted documents that did not fully respond to the questions asked.

We saw that different institutions interpreted the same questions in completely different ways."
(APC representative, interview, April 2025)



Lesson learned:

The APC will consider **developing shorter operational guides** to serve as reference tools when interpreting questions and preparing evidence.



The Focus Should Be on the Substantive Application of Anti-Corruption Measures, Not Only Their Formal Existence

Although most institutions demonstrated a high level of commitment to the process, it was also observed that some adopted a predominantly formal approach — focusing on meeting procedural requirements without deeper reflection on the actual implementation of anti-corruption policies. This was reflected in the preparation of documents that formally satisfied the questionnaire requirements, but without substantive consideration of whether internal policies are effective, implemented in practice, and understood by staff.

“For some, it mattered more to show that they had submitted something than to ensure that what they submitted actually had substance.”

(Co-author of the Methodology, interview, May 2025)

One of the aims of the Methodology is to encourage institutions to view the process not as another administrative obligation, but as an opportunity for reflection and for strengthening integrity.

Lesson learned:

In future stages of applying the Methodology, it is recommended **to further reinforce the qualitative aspects of the assessment**. This includes checks such as whether staff are familiar with procedures, whether those procedures are applied in practice, and whether there is feedback on their effectiveness. The APC plans to enhance these processes through monitoring the implementation of the recommendations issued in future cycles. This initiative has already begun within the state administration and the social and child protection systems.



Insufficient Authority of Integrity Managers

It was observed that the system of Integrity Managers is not optimally structured, particularly regarding their ability to influence change within institutions. In practice, Integrity Managers often hold positions at the level of officers or lower-level managers, without clear authority to initiate or oversee the implementation of integrity measures. Their role is not supported by specific legal powers or additional mechanisms that would ensure their independence and operational capacity.

An additional challenge is the frequent rotation or replacement of Integrity Managers, which results in a lack of institutional memory and disrupts the continuity of activities.

In many cases, Integrity Managers perform this function alongside numerous other duties within their regular job scope, which further limits the time and resources they can dedicate to developing and monitoring integrity measures.

“The Integrity Manager did not have enough authority to influence real change within the institution. The responsibility for integrity needs to rest with the head of the institution.”

(Integrity Manager, May 2025)

Lesson learned:

A sustainable integrity system requires **responsibility from all employees**, with a clear emphasis on the role of **institutional leadership as the primary bearers of integrity**.

It is recommended to consider strengthening **the legal framework and institutional positioning of Integrity Managers**, which would reinforce their authority and contribute to the long-term sustainability of the system.

IV Examples of Good Practice during the Implementation of the Methodology in Montenegro

Throughout the implementation of the Methodology, Montenegrin institutions demonstrated that integrity is not an abstract concept, but a day-to-day practice that can be strengthened through concrete steps. The following examples illustrate different forms of progress — **from rapid institutional responses and motivation generated through public ranking, to the exchange of experiences and greater engagement of employees in the integrity-building processes**.



Rapid institutional response to the questionnaire

In many institutions, the self-assessment process revealed gaps in internal acts and procedures. This, in itself, served as an incentive for documents to be drafted and adopted without delay, showing the practical value of the Methodology and its potential to strengthen institutional practice even before the formal assessment is completed.

“The very process of completing the questionnaire ‘forced’ us to adopt regulations we did not have. We did not wait for the assessment — we wanted to be ready while the process was ongoing.” *(Integrity Manager, interview, May 2025)*



Strengthening the role of Integrity Managers

The Methodology gave new weight to the role of Integrity Managers, who in many institutions became key drivers of change. Their coordination and communication with staff enabled the faster adoption of internal acts and the strengthening of ethical culture.

“For the first time, we felt that our work had systemic importance — that we were not just a formality, but an essential part of the process.” *(Integrity Manager, interview, May 2025)*



Motivation through public ranking

The public presentation of results and institutional ranking proved to be a strong source of motivation. Institutions recognised the importance of transparency and showed a clear interest in improving their performance, reaffirming their commitment to the assessment. This approach encouraged cooperation among institutions and the exchange of good practices.

"The ranking gave us an additional incentive — not only to show that we perform well, but also to understand where we can do better." (Integrity Manager)¹⁷



Exchange of experience among institutions

Workshops and inter-institutional contacts contributed to the exchange of practical solutions, particularly between smaller local governments and larger systems. Many of the recommendations were implemented thanks to examples shared during the process.

"It helped us a lot to see how others approach these issues — we applied some ideas immediately." (Integrity Manager)¹⁸



The need for broader institutional engagement

The assessment process showed that institutions which participated — regardless of their starting position — made meaningful progress in strengthening integrity. Their participation alone reflected a willingness to recognise and address existing challenges. However, some institutions have not yet recognised the value of this process and did not take part in the assessment. This highlights the need for additional communication and motivation, to ensure that all institutions become part of a shared effort to strengthen integrity. Broader participation enhances public accountability and fosters inter-institutional comparison and a positive, motivating competitive spirit.

"It is important to further motivate institutions to participate — through outreach, explanations of the benefits, and highlighting the importance of results for reputation and public trust." (Co-author of the Methodology, interview, May 2025)



Increased awareness and rapid implementation of recommendations

The self-assessment process and the APC's assessment influenced not only institutional leadership but also encouraged employees to think more actively about integrity and anti-corruption measures. In many institutions, this process opened space for discussions on risks and ways to mitigate them, while some institutions began implementing recommendations immediately after the presentation

17 Source: Video material "Integrity in Action - A System Without Corruption!", UNDP/APC, July 2022, <https://www.youtube.com/watch?v=gj1Y9Yqwk88>

18 Source: Video material "Integrity in Action - A System Without Corruption", UNDP/APC, July 2022, <https://www.youtube.com/watch?v=gj1Y9Yqwk88>

of results. New internal regulations were introduced, procedures updated, and internal controls strengthened to improve transparency and a culture of responsible conduct.

“This process has sparked conversations about integrity among employees – we now talk more about risks and how to mitigate them.”

(Integrity Manager, interview, May 2025)

“We didn’t wait for the next cycle — we immediately initiated changes to improve the work of our authority.”

(Integrity Manager)¹⁹

These examples confirm that the Methodology has strong transformational potential when applied in a transparent and inclusive manner. Public disclosure of results, open dialogue with institutions, training of staff, and public recognition of achievements have all proven to be key factors of success. Montenegro’s experience shows that a combined approach — institutional self-assessment, external scoring, and active engagement of all stakeholders — not only strengthens integrity but also fosters a culture of accountability and continuous improvement across the public sector.

V Recommendations and Conclusions for Other Countries

Through the Methodology, the APC **has taken an important step forward** — in addition to monitoring the efficiency and effectiveness of Integrity Plans, it has enabled **evidence-based insight into whether institutions have been innovative and proactive in preventing corruption**. This approach helps institutions plan anti-corruption measures in a more substantive and forward-looking manner.

Below is a concise set of recommendations for institutions and organisations interested in developing similar models:

A. Preparatory Phase

- Before introducing the Methodology, analyse the institutional and legal framework, institutional capacities, and existing anti-corruption measures;
- Finalise the Methodology through an inclusive process with those who will be assessed; consider involving academia, civil society, and other professionals who can contribute to the methodological tool;
- Pilot the Methodology in one sector and adapt it based on feedback.

¹⁹ Source: Video material “Integrity in Action - A System Without Corruption!”, UNDP/APC, July 2022, <https://www.youtube.com/watch?v=gj1Y9Yqwk88>

B. Conducting Self-Assessment and External Evaluation

- Institutions should carry out the self-assessment using structured questionnaires based on the Methodology's categories, criteria, and qualitative and quantitative indicators;
- The external evaluation, which serves to verify the self-assessment, should be conducted by an independent body or an anti-corruption agency, with the possibility of consulting external experts, as was the case in Montenegro²⁰;
- Recommendations should be provided both at the level of individual institutions and at the sector level.

C. Publication of Results

- Public disclosure of results contributes to accountability and inter-institutional learning;
- It is advisable to recognise top-ranked institutions: in the Republic of Korea, institutions with the highest scores receive public recognition. Montenegro may develop similar motivational mechanisms — a recommendation equally relevant for other countries.

D. Monitoring and System Improvement

- It is essential to follow up on how institutions implement the recommendations provided during the assessment phase, as this enables measuring the systemic effects of the Methodology.;
- Consider including supplementary indicators in performance measurement, such as the perceptions of other institutions, citizens, results of employee surveys, and similar sources;
- Risks differ depending on the nature of the sector and the level of public interaction; therefore, it is essential to ensure continuous refinement of the Methodology so that it reflects sector-specific risk profiles;
- Managers and senior leadership should assume responsibility and actively promote a culture of integrity;
- It is important to involve successful institutions — as well as integrity managers — in ongoing training programmes, both to recognise their achievements and to motivate others in the public sector to take part in the process;
- Recommendations developed during the assessment should be clearly communicated to decision-makers in the Government, particularly to the competent ministries and other institutions responsible for monitoring compliance with legal obligations;
- Successful institutions should be publicly recognised, while those that refuse to participate should be proactively informed of the importance of the process. Ultimately, regular reporting to competent institutions, the Government, civil society and the media is essential.

Montenegro's experience demonstrates that innovative and sustainable approaches to strengthening integrity in the public sector can be developed even under limited time and staffing conditions.

²⁰ The APC developed the Methodology with the support of local and international experts engaged by UNDP in Montenegro

The Methodology shows that transparency, training, public recognition, and ongoing assessment can be combined into a tool that not only measures but actively enhances institutional integrity. This approach — grounded in international experience yet adapted to the Montenegrin context — can serve as a valuable model for other countries seeking to develop or strengthen their own integrity assessment systems.

The process does not end with the adoption of the Methodology — it is at that point that meaningful change in institutional culture truly begins.

References

1. **APC and UNDP (2022–2025)** – *Integrity in Action* — Reports on the Assessment of the Implementation of Anti-Corruption Measures in: Local Self-Government Units; the Judiciary; the Prosecution Service; the Social and Child Protection System; and the Public Administration and Other State Authorities
2. **APC and UNDP (2022)**, *Methodology for Assessing the Implementation of Anti-Corruption Measures in Montenegro*
3. **APC**, presentation “*Methodology for Assessment of Implementation of Anti-Corruption Measures*”, Marko Škerović, June 2025
4. **Interviews** with representatives of the APC, Montenegrin institutions (integrity managers), consultants, and partners from the Republic of Korea (UNDP and ACRC) (April–May 2025)
5. **Jun-min Lee (ACRC); Ahjung Lee, Seoul Policy Centre (UNDP)**: *Introduction to Korea's Anti-Corruption Initiative Assessment*
6. **Anti-Corruption and Civil Rights Commission (ACRC) of the Republic of Korea** (2020), *USPC-AIA FAQ*
7. **Anti-Corruption and Civil Rights Commission (ACRC) of the Republic of Korea** (2020), *Introduction to Korea's Anti-Corruption Initiative Assessment*
8. **Transcripts of the online conference**: international practices (Algeria, Uzbekistan, Republic of Korea, Montenegro), May 2025
9. **Law on Prevention of Corruption**, Official Gazette of Montenegro 053/14 of 19 December 2014, 042/17 of 30 June 2017
10. <https://www.youtube.com/watch?v=gj1Y9Yqwk88>
11. <https://www.undp.org/cnr/montenegro/stories/integritet-na-djelu-sistem-bez-korupcije>



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