



KOSOVO POLICE

INTEGRITY PLAN

2024 – 2026

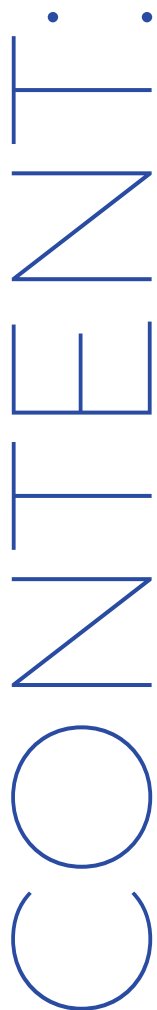


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INTEGRITY PLAN



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Statement of Integrity



Colonel Gazmend HOXHA
General Police Director of Republic
of Kosovo

Integrity in the police organization means that police work is guided by a number of clearly defined ethical values such as: objectivity, impartiality, professionalism, respect for gender and diversity, justice, equality, honesty, accountability, diversity, respect for human rights.

Integrity is the consistent behavior in accordance with ethical values and that's why, integrity is important both in an individual and institutional aspect.

Integrity at the organizational level is an indication that the organization is built and operates in accordance with ethical values. At the individual level, integrity means that individuals adhere to the principle of integrity and their behaviors are consistent with the ethical values defined by the organization.

Integrity in the police organization means that police work is guided by a number of clearly defined ethical values such as: objectivity, impartiality, professionalism, respect for gender and diversity, justice, equality, honesty, accountability, diversity, respect for human rights.

Integrity must be prompted by the Police organization at all levels.

Police is an institution that has a specific position and role in a democratic society, which makes integrity even more important.

In order to respond to the trust of citizens, the Police adheres to the code of ethics and demonstrates high professionalism and integrity. Based on the researches of local and international institutions, Kosovo Police is one of the most reliable institutions in the country and this assessment makes it even more responsible, to advance the work standards to the highest level in policies against negative and other unethical phenomena.

With the creation of the integrity sector with the organizational structure of the Police and the implementation of this plan, Kosovo Police continues to show its commitment to the development and advancement of integrity within the organization and be a good example for others.

Introduction

In accordance with Article 25 of Law no. 08/1-017 on the Agency for the Prevention of Corruption and in accordance with the "Methodology of Integrity Plans" which obliges all institutions to draft and approve integrity plans, Kosovo Police has drafted and approved the Integrity Plan for the period 2024-2026.

The integrity plan is a three (3) year internal document and is updated annually. It is a documented process to assess the level of integrity vulnerability within the Institution which provides measures for integrity management to achieve the institution's integrity objectives.

The plan reiterates the commitment of Kosovo Police to increase and strengthen existing operational controls in all activities within its scope.

The plan describes risk-based measures for achieving the objectives of Kosovo Police and strengthening the rule of law, as well as professional values and standards.

This plan is considered an important part of the overall planning processes related to the strategic plan for institutional development, which adds the aspect of risk management. More broadly, it complements the effective implementation of the Police Anti-Corruption Action Plan. With the implementation of this integrity plan, Kosovo Police is in a better position to ensure its efficiency, effectiveness, transparency and ethics.

Purpose

The purpose of the plan for strengthening integrity in Kosovo Police is to have:

- An effective integrity management system in the institution, through ensuring integrity risk management throughout the organization, with a strategic focus on high-risk areas; balancing between pro-active and reactive forms of integrity risk management; reducing/eliminating opportunities for corruption and improving overall sustainability to corruption;
- Institutional resistance to integrity violations by promoting the further development of the capacities of all personnel for the effective prevention of risks to integrity and the detection of vulnerabilities, raising awareness at all levels and functions, encouraging collective commitment and co-ownership in risk management to integrity;
- Public accountability and transparency through improving the framework of trust with external and internal actors, and to respond to their demands and expectations regarding the integrity performance of Kosovo Police.

Objectives

The integrity plan aims:

- Increasing the opportunities for the institution to achieve the objectives of integrity management;
- Identification of risks and measures to reduce risks;
- Improving controls against identified risks;
- Maintaining a system to ensure compliance with legal and procedural requirements and standards;
- Increasing the confidence of staff and external stakeholders in the commitment to integrity demonstrated by the institution.

Contents of the Integrity Plan

The integrity plan contains the following elements:

- A self-assessment of the institution's exposure to corruption and other forms of integrity violations;
- Information about the scope of the institution;
- Types of corruption risks and other forms of integrity violations;
- Existing control measures;
- Preventive measures for reducing the risk of corruption and other forms of violation of integrity and deadlines for their implementation;
- Information for the person responsible for managing the design and implementation of the integrity plan;
- Other data, in accordance with the methodology for drafting the integrity plan.

Integrity Plan development process

The development of the Integrity Plan consists of several stages as follows:

- **The first stage:** The general director of Police has made a decision on the appointment of the coordinator and the working group for drafting of the Integrity Plan.

On 19.09.2023, the working group of eight members (one chairperson and seven members) accepted the decision of the General Director of the KP, Colonel Gazmend HOXHA, regarding the drafting of the 2024-2026 Integrity Plan.

On 23.10.2023, the working group, through the first electronic correspondence, agreed that on 25/10/2023 to hold the first informative and orientation meeting about the start of the preparation of the integrity plan. Also in this correspondence, the head of the working group requested that during the first meeting we refer to the preliminary integrity plan in order to have a pragmatic orientation about the compilation of the next plan as well as the decision to approve the methodology issued by the Agency for the Prevention of corruption.

On 25/10/2023, the first meeting was held between the working group where these issues were addressed:

- Agreeing on the preparation of the research within the KP as well as finding the possibility of conducting the research online;
- To start with the preparation of the sample for the compilation of the questionnaires and by October 31, 2023 the questionnaire will be ready;
- After finalizing the questionnaires, start immediately with the preparation of the narrative of the document;
- The working group reviewed the legal framework (regulations, administrative instructions, plans, internal audit control, systematization and description of jobs, as

well as other sources of information about work areas and processes);

- The working group has sent a request to the director of information technology regarding the possibility of support in the realization of research in electronic form.

On 26/10/2023, from the KP Integrity Sector, we received the models (sample) of the Agency for the Prevention of Corruption regarding the drafting of the integrity plan for the KP.

- **The second stage:** On 27/10/2023, we received a sample of a questionnaire from the members of the group, where we agreed that by 03/11/2023 each of them will be analyzed, processed and determined from a personal/professional angle, and at the next meeting the questionnaire will be processed directly from all members of the working group.

From the date 27/10/2023 to 03/11/2023 from all members of the working group we have received the feedback and concrete proposals about the questions included in the first sample of the questionnaire where we have agreed to elaborate all of them one by one during the next meeting.

On 06/11/2023, the next meeting was held with the working group where the questionnaire in question was reviewed, worked on and processed.

On 07/11/2023, the questionnaire was finalized with all proposals/suggestions given by the working group.

On 08/11/2023, the working group sent the said questionnaire to the director of information technology, where they were asked to work in electronic form to facilitate the research process.

On 09/10/2023, we received the letter from the KP technology officer that the electronic form of the questionnaire is ready, and at the same time we received the link for it. Also, in the letter in question, we have accepted the clarifications given for the questionnaire in question.

On 10/11/2023 the working group contacted the IT officer where we agreed to hold a meeting between the members of the group and the IT officer in order to fill in some details of the questionnaire.

On 11/13/2023, a meeting was held between the IT officer and the members of the working group, where some proposals were given to make some technical additions to the said questionnaire.

On 11/15/2023, after the questionnaire has been finalized from the technical aspect by IT, it has been forwarded to the Personnel Directorate to be translated into Serbian.

On 21/11/2023, we received the questionnaire translated into Serbian from the relevant directorate.

On 21/11/2023, the questionnaire in Serbian language was forwarded to the IT officer, who was also informed that in a few days the electronic addresses for the distribution of the questionnaire to the focus groups will also be forwarded.

On 22/11/2023 the members of the working group met the IT officer to define and review once again the two versions of the questionnaire in electronic form.

On 27/11/2023, all electronic addresses of the focus group where it was estimated to send

the questionnaire were forwarded to the IT officer from the working group.

On 27/11/2023, the electronic questionnaire was forwarded to all persons identified as relevant to answer the questionnaire. The focus group of the research was superiors/police officers and civil servants from all departments of the KP, as well as from the Office of the Director and Deputy General Director. In addition to forwarding the questionnaire, the instructions for completing the questionnaire were also forwarded as well as the last date of forwarding the questionnaires completed by the respondents.

On 29/11/2023, the working group sent an electronic letter to all the directors of the departments, asking them to convey the message to all their subordinates, specifying the importance of this questionnaire and the responsibility for completing the questionnaire.

On 01/12/2023, the IT officer informed us about the number of questionnaires received by the respondents, which resulted in 71%, where in this case, as a group, we agreed to forward the questionnaire once more and give some more time to submit the completed questionnaires.

On 05/12/2023, the said questionnaire was forwarded once again, where additional clarifications were given about the deadline and the importance of completing the questionnaire.

On 07/12/2023, the members of the working group prepared the first draft of the narrative of the document and we agreed to send the relevant comments/suggestions/proposals.

- **The third stage:** The working group has received the comprehensive questionnaire, in order to process the self-assessment survey. The research was carried out electronically, with a total of 278 respondents from all levels of the structural organization of the Kosovo Police.

On 12/18/2023, we received the answers to the electronic questionnaire processed and placed in a PDF document from the IT officer, as well as the link to the completed questionnaires was forwarded to us.

On 18/12/2023, the questionnaire processed with the results of the research was forwarded to the working group where it was requested that everyone analyze the results of the questionnaire in his/her own field and identify the general and specific risks and send in the group no later than on 22/12/2023.

On 12/22/2023, the members of the working group sent the identified risks as well as completing the narrative of the document in several points.

On 09/01/2024, the working group met to work intensively on defining and establishing general risks, specific risks identified by research, as well as activities that have been assessed necessary, measurable and objective.

On 11/01/2024, the working group agreed to make a final review of the general and specific areas of risk.

On 15/01/2024, the working group once again reviewed the integrity plan and the narrative part and the identified risks, where some additional proposals were forwarded by the group members to be placed in the narrative part.

Based on the results of the questionnaire, four (4) areas of general risk were defined and fifteen (15) areas of specific risks were identified.

Also, based on the risks identified by the working group, an action plan was developed with 27 activities from the areas of general risks and 61 activities from the areas of specific risks that must be carried out in order to prevent or avoid risks that affect the integrity of the organization.

Summary: During the drafting stages of the Integrity Plan by the working group there were:

- held three meetings with all group members, workshop format meetings;
- held four separate meetings with certain members of the working group who were delegated to work on certain areas in drafting of the document;
- held two meetings between group members and the IT officer;
- exchanged 43 letters between the working group.

Risk assessment method

The Risk Assessment method determines the probability of occurrence and consequences of breach of integrity and other forms of illegal or unethical behavior.

Through the risk assessment, the possibility of occurrence and the level of consequence are determined, which can be: low/medium/high. The final level of risk is determined according to the risk matrix, in the form of a combination between possibility and consequence.

Figure 1. Risk assessment matrix

Consequence/Impact	Major	10									
		9									
		8									
	Medium	7									
		6									
		5									
		4									
	Low	3									
		2									
		1									
Risk intensity (probability X impact)		Low			Medium			High			
		Probability/Likelihood									

The risk intensity is obtained by multiplying the probability/likelihood by the consequence/impact, using the risk matrix, "impact (1-10) x consequence (1-10)", shown in the figure above.

The overall assessment of the risk of corruption and other forms of violation of integrity is evaluated from 1 to 100, as in the table below:

Low	Medium	High
1 - 15 points	16 - 48	49 - 100

■ - Low intensity risk - the possibility of corruption or other forms of breach of integrity occurring is very small due to existing control measures.

■ - Medium intensity risk - the occurrence of corruption or other forms of breach of integrity is possible, but the control measures manage this risk.

■ - High intensity risk - corruption or other forms of integrity violations are already present in the process or are likely to occur.

Monitoring the implementation of the Integrity Plan and reporting

The implementation of the Integrity Plan will be continuously monitored by the Integrity Sector, namely the Responsible Officer from the Kosovo Police and the Corruption Prevention Agency.

Ongoing monitoring of implementation is important to ensure that integrity risk controls and training measures are effective, both in design and implementation, and that procedures are understood and the integrity plan is followed.

Also, monitoring should determine if the measures used to handle the risk have produced the planned effects, detected changes in the external and internal context including changes in the risk itself, changes that require revision of risk treatment and priorities and have identified what lessons should be learned for future planning.

The tasks and activities derived from the "Integrity Plan 2024 - 2026" are mandatory (applicable) for all structural and organizational components in Kosovo Police. All departments, divisions, directorates, sectors and units within the organizational structure of the KP, report to the integrity sector in regular six (6) month periods, but also in closer time periods if such a thing is required according to integrity plan regarding the implementation of actions and measures to strengthen integrity.

Regular reporting ensures that the implementation of the plan is on schedule and that the planned results are achieved. Also, after drafting the report on the implementation of the integrity plan by the responsible officer within the institution, the report must be sent for evaluation to the Agency for the Prevention of Corruption.

Areas of risk

1. General Areas of Risk

The general areas of risk are:

- The field of financial management,
- Human resource management field;
- The scope of exercising police powers
- Strengthening the principle of objectivity, impartiality and transparency.

2. Specific areas of risk

The specific areas of risk are:

- Public procurement;
- Auditing;
- Management of projects/ contracts;
- Recruitment and promotions;
- Lack of training in the field of ethics, integrity, conflict of interest, prevention of corruption and misuse of official duties;
- Secondary and off-duty work;
- Inspections;
- The field of supervision and control of public order;
- Field of road traffic supervision and control;
- Management, control and monitoring of criminal cases that are being investigated;
- Border control and surveillance as well as migration;
- Prevention of conflict of interest;
- Information for the public and employees (transparency);
- Strengthening the signaling mechanism;
- Acceptance and declaration of gifts.

Integrity plan
General risk areas

Risk registration			Risk assessment and measurement			Action to risk		
Risk areas	Risk Description	Existing control measures	Probability	Impact	Risk assessment	Proposed measures to reduce / eliminate risks	Responsible unit/officer	Implementation deadline
1. Financial management	1.1. Transparency	Internal and external audit; Internal and external inspection;	4	9	36	Increasing Transparency and accountability;	Support services department	In continuation
	1.2. Controls and inspections		4	8	32	Periodic and extraordinary audits;	KP audit unit and auditor general	6 months
	1.3. Appointment of professionals		6	9	54	Drafting of criteria for the appointment of committee members in the drafting of specifications according to relevant fields;	Department of support services; Procurement Director and Project Manager.	3 months
2. Human resources	2.1. Systematization of personnel according to the organizational structure	External and internal inspections;	3	7	21	Increasing transparency and accountability;	Human resources department;	In continuation

management					Review normative acts; Preliminary assessment needs;	of of	Directorate of strategic planning and legal affairs (DPSQL)	6 months 3 months
	2.2. Quality of training and teaching		5	9	45	Revision and completion of teaching programs; Accreditation of teaching programs; Advancement of teaching capacities;	Training Division	9 months 12 months 12 months
		2.3. Conflict of interest.		5	7	35	Refreshing of PSOs; Determining tasks that may present a conflict of interest; Increased monitoring and inspections.	Human resources department; Directorate of strategic planning and legal affairs (DPSQL); Unit for secondary and off-duty work.

3. The scope of exercising police powers	3.1. Failure to comply with police powers	Management supervision and control; Inspection unit and audit unit; Inspections by the Police Inspectorate of Kosovo (KPI).	5	9	45	Raising the level of regular and extraordinary Inspections; Reports and recommendations on findings; Actions taken.	All Management and inspection units	In continuation 6 months 6 months
	3.2. Ambiguities between organizational units		3	9	27	Strengthening supervision, control, inspection and reporting by management; Review of normative acts.	All Management and inspection units; Directorate of strategic planning and legal affairs (DPSQL).	In continuation 9 months
	3.3. Lack of equipment		6	10	60	Strengthening supervision, control, inspection and reporting by management. Assessment of needs.	All Management and inspection units; Support services department.	In continuation 6 months
	3.4. Cooperation, Communication		5	10	50	Organization of meetings, conferences;	The entire Management;	In continuation

						Increased cooperation and communication; Transparency; Reporting.	Community Policing Division; Directorate and Offices for Information and Public Relations.	6 months
	3.5. Prevention of conflict of interest		7	8	56	Drafting and updating of procedures and normative acts	Directorate of strategic planning and legal affairs (DPSQL); Responsible officer.	6 months
4. Strengthening the principle of objectivity, impartiality and transparency,	4.1. Communication with the public and employees (transparency)	Directorate for information and public relations; Directorate of Internal Investigations.	3	8	24	Increasing transparency in the field of public information about police activities.	Directorate and Offices for Information and Public Relations.	In continuation
	4.2. Access to official documents		3	7	21	Updating procedures and normative acts for access to official documents and their classification.	Directorate of strategic planning and legal affairs (DPSQL); Responsible officer based on the law.	6 months

	4.3. Timely acceptance and handling of requests and complaints		4	8	32	Increasing accountability and responsibility;	The entire Management; Directorate of Internal Investigations.	In continuation
	4.4. Complaints related to ethics, integrity, conflict of interest, corruption and abuse of office		5	10	50	Priority handling of this category of complaints; Reporting.	The entire Management; Directorate of Internal Investigations.	In continuation 6 months
Special areas of risk								
Risk registration			Risk assessment and measurement			Acting to risk		

Risk area	Risk description	Existing control measures	Probability	Impact	Risk assessment	Proposed measures to reduce / eliminate risks	Responsible Unit/ officer	Implementation deadline
1. Public procurement;	1.1. Transparency	Internal audit; External audit;	6	9	54	Increasing Transparency; Publication of Contracts according to the legislation in force.	Department of support services; Director of procurement.	In continuation
	1.2. Conflict of interest		6	10	60	Drafting and updating of procedures and normative acts.	Directorate of strategic planning and legal affairs(DPSQL); Department of support services.	6 months
	1.3. Accountability, Professionalism		5	10	50	Appointment of professionals for the drafting of specifications according to relevant fields; Reporting.	Department of support services; Director of procurement.	In continuation 6 months
2. Audit	2.1. Performing periodic audits only	Internal audit; External audit;	4	7	28	Increasing extraordinary audits;	KP Audit Unit and auditor general.	In continuation

						Reporting and recommendations from audit reports.		6 months
3. Project/contract management	3.1. Inspection; Not enough knowledge	Internal and external inspection;	4	8	32	Transparency and accountability; Extraordinary inspections; Appointment of professionals.	Director of procurement and the project/contract manager; Direct supervisor of the contract manager.	In continuation 6 months In continuation
4. Recruitment and promotions	4.1. Transparency and accountability	Supervisory commissions and external and internal inspections;	3	7	21	Increasing transparency and accountability; Application of the audiovisual system; Review of normative acts.	Human Resources Department; Directorate of strategic planning and legal affairs (DPSQL).	In continuation 6 months
5. Lack of training in the field of ethics,	5.1. Deficiencies in the performance of duty and lack of professionalism	Inspection; Evaluation.	5	10	50	Research in relevant fields;	Training Division	3 months

integrity, conflict of interest, prevention of corruption and misuse of official position;						Designing new teaching programs; Review and completion of teaching programs; Advancement of teaching capacities; Organization of trainings.		6 months 6 months 12 months 12 months
6. Secondary and off-duty work;	6.1. Abuse of official duty	Unit for secondary and off-duty work; Supervision by responsible stations.	5	7	35	Update of PSOs; Determining tasks that may present a conflict of interest; Monitoring and inspection by the unit for secondary and off-duty work; Reporting.	Human Resources Department Unit for secondary and off-duty work.	6 months 6 months In continuation 6 months
7. Inspections, including regular, extraordinary	7.1. Failure to comply with police powers	Management supervision and control;	6	8	48	Raising the level of regular and extraordinary Inspections;	Management at all levels and inspection units.	In continuation

and instant inspections;		Inspection unit and audit unit; Kosovo Police Inspectorate (KPI).				Reports and recommendations on the findings; Actions taken.		6 months 6 months
	7.2. Exceeding police powers		5	10	50	Raising the level of regular and extraordinary Inspections; Reports and recommendations on findings; Actions undertaken; Initiated processes.	Management at all levels and inspection units.	In continuation 6 months 6 months 12 months
	7.3. Failure to comply with work procedures		5	9	45	Raising the level of regular and extraordinary Inspections; Reports and recommendations on findings; Actions taken.	Management at all levels and inspection units	In continuation 6 months 6 months

8. The field of supervision and control of public order.	8.1. Failure to comply with police powers	Management supervision and control; Inspection unit and audit unit;	3	9	27	Strengthening supervision, control, inspection; Reporting by management.	Department of public order; Inspection units.	In continuation 6 months
	8.2. Exceeding police powers	Kosovo police Inspectorate (KPI).	4	9	36	Strengthening of supervision, control, inspection; Reporting by management.	Department of public order; Inspection units.	In continuation 6 months
	8.3. Failure to comply with work procedures		3	9	27	Strengthening of supervision, control, inspection; Reporting by the management.	Department of Public order; Inspection Units.	In continuation 6 months
9. The field of road traffic supervision and control.	9.1.Failure to comply with police powers	Management supervision and control; Inspection unit Audit unit	5	10	50	Strengthening of supervision, control, inspection; Reporting by the management. Device with smart equipment;	Department of Public order; Road Traffic Division; Inspection Units.	In continuation 6 months 12 months

		Kosovo Police Inspectorate (KPI)				Body camera device;		12 months
	9.2. Exceeding police powers		6	10	60	Strengthening of supervision, control, inspection; Reporting by the management. Equipping with intelligent devices; Equipping with body cameras.	Department of Public order; Road Traffic Division; Inspection Units.	In continuation 6 months 12 months 12 months
	9.3. Failure to comply with work procedures		6	8	48	Strengthening of supervision, control, inspection; Reporting by the management.	Department of Public order; Road Traffic Division; Inspection Units.	In continuation 6 months
10. Management, control and monitoring of criminal cases that are being investigated.	10.1. Improper handling of cases	Management supervision and control; Inspection unit and audit unit;	5	10	50	Strengthening of supervision, control, inspection; Reporting by the management; Accountability.	Investigations department; Department of Public order; Border Department; Inspection Units.	In continuation 6 months In continuation

	10.2. Non-meritorious assignment of cases	Kosovo Police Inspectorate (KPI).	4	10	40	Strengthening of supervision, control, inspection; Reporting by the management; Recording case allocation in the database.	Investigations department; Department of Public order; Border Department; Inspection Units.	In continuation 6 months In continuation
	10.3. Delay in handling cases		4	10	40	Strengthening of supervision, control, inspection; Reporting by the management; Monitoring the progress of cases.	Investigations department; Department of Public order; Border Department; Inspection Units.	In continuation 6 months In continuation
11. Border control and surveillance as well as migration.	11.1.Failure to comply with police powers	Management supervision and control; Inspection unit and audit unit;	5	9	45	Strengthening of supervision, control, inspection; Reporting by the management.	Border Department; Inspection Units	In continuation 6 months
	11.2. Exceeding police powers	Kosovo Police Inspectorate (IPK-ja).	5	10	50	Strengthening of supervision, control, inspection; Reporting by the management.	Border Department; Inspection Units	In continuation 6 months

	11.3. Failure to comply with work procedures.		4	9	36	Strengthening of supervision, control, inspection; Reporting by the management.	Border Department; Inspection Units.	In continuation 6 months
12. Prevention of Conflict of Interest.	12.1. Failure to report conflict of interest.	Management supervision and control; Inspection unit and audit unit; Kosovo Police Inspectorate (IPK).	5	10	50	Strengthening of supervision, control, inspection; Reporting by the management; Drafting and updating of procedures and normative acts.	Management at all levels and Inspection Units; Directorate of strategic planning and legal affairs(DPSQL) Responsible officer	In continuation 6 months 6 months
	12.2. Lack of knowledge about conflict of interest.		7	8	56	Drafting of lesson plans; Personnel training.	Training Division.	6 months 12 months
13. Information for the public and employees (transparency).	13.1. Lack of information/misunderstandings	Directorate for information and public relations.	3	8	24	Enrichment and completion with information of the police website; Organization of information	Directorate and Offices for Information and Public Relations.	In continuation 9 months

						campaigns for the public; Distribution of informative materials (leaflets).		9 months
	13.2. Decreasing responsibility.		3	9	27	Increasing transparency in the field of public information.	Directorate and Offices for Information and Public Relations.	In continuation
	13.3. Poor communication within the organization.		3	8	24	Advancement of communication and information through the electronic system.	Department of support services.	12 months
	13.4. Classified documents.		3	10	30	Updating of procedures and normative acts for the classification of documents.	Directorate of strategic planning and legal affairs(DPSQL); Directorate and Offices for Information and Public Relations.	6 months
14. Strengthening the	14.1. Lack of knowledge about the importance of whistleblowing.	Whistleblowing officers.	5	7	35	Updating procedures and normative acts;	Directorate of strategic planning and legal affairs(DPSQL);	6 months

whistleblowing mechanism.						Training on the importance of whistleblowing.	Responsible officers; Training Division.	12 months
	14.2. Reluctance to whistleblowing.		6	7	42	Training on the importance of whistleblowing; Reporting.	Training Division; Responsible officers.	12 months 6 months
15. Acceptance and declaration of gifts.	15.1. Non-compliance with normative acts.	Management.	4	8	32	Updating procedures and normative acts for acceptance and declaration of gifts.	Directorate of strategic planning and legal affairs(DPSQL); Responsible officers according to the law.	6 months
