

## **INSTITUTIONAL INTEGRITY IN THE SECURITY SECTOR: ANTI-CORRUPTION APPROACHES IN NORTH MACEDONIA**

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### **Abstract**

In transitional democracies with insufficient respect for the rule of law, where institutions are still developing and striving to strengthen their governance, corruption poses a significant threat to the security sector as well. In such conditions, corruption undermines the operational capacities of security institutions and weakens their efficiency, accountability, legitimacy and public trust. This paper aims to investigate, present and analyse the anti-corruption measures that are applied within the security sector institutions in the Republic of North Macedonia. A special focus will be placed on strengthening institutional integrity as an important component of good governance and sustainable reforms. The study analyses the existing legal and strategic frameworks, institutional practices and internal control mechanisms in preventing and countering corruption in key security sector institutions in the Republic of North Macedonia. It is conducted using a qualitative methodology, by reviewing national legislation, strategic documents, official reports and assessments from relevant international organisations. The findings highlight institutional challenges in establishing anti-corruption policies, as well as differences between the institutional approaches, measures and mechanisms adopted by the institutions to address corruption. The paper concludes with the importance of sustained political will and of creating and fostering a professional organisational culture that respects ethical standards, transparency and accountability as core values of the security sector.

**Keywords:** corruption, institutions, integrity, governance, accountability, security sector

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## 1. Introduction

Corruption is a phenomenon that seriously undermines the functioning of democratic institutions and the rule of law. Corrupt activities within institutions undermine their efficiency, legitimacy, and reputation, especially if the institutions are not sufficiently resilient and do not detect and deal with them internally.

Institutional corruption (Lessig, 2013) undermines the institution's effectiveness by diverting it from its purpose or weakening its ability to achieve its purpose, including, to the extent relevant to its purpose, weakening either the public's trust in that institution or the institution's inherent trustworthiness. Therefore, Lessig (2013) defines institutional corruption as a state in which institutional integrity has eroded in one or more of a set of relevant dimensions. Wueste (2005) thinks that institutional health depends upon institutional integrity, and institutional integrity depends upon individual integrity. If that's right, "disease" may be manifest at two levels—at the level of institutional or individual integrity. Therefore, Gillian (2014) considers institutional integrity as a baseline for examining the dimensions of institutional corruption. Institutional integrity exists when all four of the following conditions are met: (i) An institution achieves its purposes effectively and equitably; (ii) Insofar as an institution is properly dependent on P (or parties P1, P2, . . . , Pn), is required to promote the interests of P (or parties P1-Pn), or is required to be accountable to P (or parties P1-Pn), it does so and does not improperly depend on or promote the interests of other parties; (iii) Because (i) and (ii) are the case, public confidence in the institution is appropriate. This confidence may assist the effectiveness of the institution; (iv) Public confidence in the institution's practices, operations, and policies can also survive appropriate transparency and accountability tests. By contrast, institutional corruption occurs when all four of the above conditions fail to be the case.

Marks (2019) offers a more demanding account of institutional integrity than public officials tend to employ. A core requirement is consistency among what an institution is obligated to do (its purpose), what the institution says it does (its mission), and what that institution actually does (its practices). If an institution's practices predictably undermine the very goals in terms of which the institution justifies its existence, that institution may be said to lack integrity.

Inspired by this concept, this paper examines the integrity of security sector institutions in North Macedonia with a particular focus on the measures and mechanisms for combating corruption adopted within their legal and strategic frameworks. The aim is to assess the extent to which these institutions demonstrate resilience to corrupt practices and influences, with special focus on their transparency and openness to the public. Specifically, the assessment will draw on all three elements of Marks' definition—namely, the consistency between what institutions are obliged to do in combating corruption within their own ranks (the goal), what they claim to do to prevent, detect and counter corrupt activities (the mission), and what they actually do in practice. These elements will be analysed through the institutional legal and strategic frameworks, that is, the legislation adopted and in force within the institutions, as well as how transparently this is communicated to the public.

## 2. Institutional Integrity: Theoretical Considerations

Rose and Heywood (2013; 2015), for example, tie the concept of integrity to a concern with public values. These authors point to the conception of integrity as an iterative process: 'integrity is part of a process, not merely something that exists in

temporally specific actions, like corruption' (Heywood & Rose, 2015). Integrity is therefore something that is cultivated, rather than being simply a set of conditions under which corruption does not occur. Certainly, in some cases, this may mean the absence of corrupt behaviour, yet it may also mean that an organisation and its members strive to maintain a commitment to the organisation's legitimate purpose. In such instances, as discussed above, if an organisation possesses integrity, it possesses more than the mere absence of corruption.

Kirby (2018) assumed that the best conception of public integrity, first and foremost, is the one most worthy of the logical, cognitive, and affective associations with the concept of personal integrity, but in the specifically public realm with public actors. It has, therefore, been an exercise in analogy and functional equivalence, fulfilling the key criteria of 'integrity' in general: coherence, consistency, justifiability, praiseworthiness, virtue logic, and trustworthiness. On this basis, the author has argued that the best conception of public integrity is organically, 'institution-first'. A public institution has integrity if and only if it has a robust disposition, through its constitutive parts, to legitimately cohere to its legitimate purpose, consistent with its own commitments, across time and circumstance. And a public officer has integrity if and only if they have the robust disposition to support the integrity of their institution.

From a practical perspective, a better understanding of institutional integrity requires deeper introspection into how an institution functions, what its vision and mission are, its values and goals, priorities, anti-corruption mechanisms, and approaches to ethical behaviour. As Robinson et al. (2008) noted, this change of focus, from preventing unethical behaviour to cultivating good behaviour, highlights the utility of integrity as a concept distinct from other aspects of good governance.

Kirby (2022) puts forward a substantive moral conception of institutional integrity as the robust disposition of an institution to pursue its purpose efficiently, within the constraints of legitimacy, and consistent with its commitments. The author argues that it is important because it provides the strongest grounding for a 'duty of support' owed by citizens to the institution. This conception of institutional integrity also helps advance the ongoing debate regarding institutional corruption, as the integrity of an institution enables it to prevent and resist corruption.

### **3. Methodology**

The research on institutional measures to combat corruption, strengthen integrity, and ensure accountability and responsibility within the existing legal and strategic frameworks covered seven key institutions in the security sector in the Republic of North Macedonia. These institutions are the Ministry of Interior (MoI), the Customs Administration (CA), the Financial Police (FP), the Financial Intelligence Unit (FIU), the National Security Agency (NSA), the Intelligence Agency (IA), and the Directorate for Security and Intelligence in Defence (DSID), which is an entity within the Ministry of Defence (MoD). Three of these institutions form the judicial police in accordance with the Law on Criminal Procedure (MoI, CA, FP). At the same time, the other three constitute the security-intelligence community, as defined in the Law on the Coordination of the Security-Intelligence Community (NSA, IA, DSID). Although the FIU does not belong to any of these groups, it was included in the analysis due to the scope and nature of its mandate – namely, collecting information to detect money laundering, terrorist financing, and other financial crimes – which ensured greater comprehensiveness of the study.

In this process, five indicators were defined to assess institutional preparedness to fight corruption. The indicators referred to the existence of:

- Internal strategy and/or action plan against corruption: existence of strategic documents containing measures and activities to fight and suppress corruption within the institution;
- Code of ethics or conduct: the existence of ethical documents with appropriate rules of conduct intended for employees of the institution to which they should adhere when performing their work;
- Regulations on conflict of interest: existence of such rules that regulate further procedure in case of identified conflicts of interest among employees of the institutions while performing their activities;
- Selection, recruitment and promotion procedures: the existence of such procedures that regulate in more detail all phases of the process of establishing an employment relationship in the institution, which guarantees that appropriate, professional and deserving personnel are employed; and
- Whistleblower protection mechanisms: the existence of such mechanisms in case of reporting of illegal activities in the institution, which may come from external or internal whistleblowers.

The data for the assessment of each of the indicators were collected from the official websites of the institutions ([mvr.gov.mk](http://mvr.gov.mk), [customs.gov.mk](http://customs.gov.mk), [finpol.gov.mk](http://finpol.gov.mk), [ufr.gov.mk](http://ufr.gov.mk), [anb.gov.mk](http://anb.gov.mk), [ja.gov.mk](http://ja.gov.mk), [mod.gov.mk](http://mod.gov.mk)). However, not all information was easily accessible due to differences in the structure of the websites, the organisation of the menus and the categorisation of documents. In cases where a large number of documents, especially bylaws, were available but were not systematically grouped, finding the necessary materials proved to be more time-consuming.

A limitation of this research is that not all institutions of the security sector have been analysed, such as institutions which are part of the protection and rescue sector, and in a broader sense, institutions for control and supervision over the security sector. Furthermore, some of the bylaws in the analysed institutions are classified at a certain level and are therefore not publicly available. However, there is no information on their websites confirming whether such acts exist, what their titles are, or what level of classification they carry. This means that certain legal acts may actually exist, but due to secrecy and lack of information, they cannot be included in the research to verify a particular indicator. On the other hand, the indicators were checked only based on the existence of relevant documents and their public availability, without delving into their content and the measures and activities they contain. Thus, by assessing and examining the availability of relevant documents for each indicator separately, the research adds value in terms of assessing the transparency and openness of the institutions of the security sector, by proactively informing the public about the anti-corruption measures they have introduced and are implementing.

#### **4. Findings**

In accordance with the established methodology, an examination was made into the websites of the seven researched institutions from the security sector in North Macedonia, and data were collected for each of the selected indicators. In doing so, Table 1 was compiled, which lists the documents that correspond to each indicator.

**Table 1. Institutional, Strategic and Legal Framework in the Security Sector Institutions in North Macedonia Regarding Anti-Corruption, Integrity and Accountability**

	Existence of Internal Integrity/Anti-Corruption Strategy/Action Plan	Code of Ethics/Conduct	Conflict of Interest Regulations	Recruitment and Promotion Procedures	Whistleblower Protection
<b>MoI</b>	Integrity Plan 2023-2025 Anti-Corruption Programme 2025	Code of Ethics 2021	Guidelines on the Manner of Conduct of Elected and Appointed Persons and Employees in the Ministry of Interior to Prevent Conflicts of Interest 2023	Several bylaws	Rulebook on Internal Protected Reporting in Public Sector Institutions 2016 (Ministry of Justice)
<b>CA</b>	Strategy for Integrity and Fight Against Corruption 2025-2028 Integrity Policy 2023	Code of Conduct 2021 Rules of Order and Discipline 2021	-	-	-
<b>FP</b>	Annual Plan for Prevention of Corruption 2022	Code of Conduct 2014 Code for Public Service Employees 2014	-	Several bylaws	Procedure on Protected Internal and External Reporting 2020
<b>FIU</b>	Annual Plan for Prevention of Corruption 2023	-	-	-	Rulebook on Protected Internal Reporting
<b>NSA</b>	-	-	-	-	Rulebook on Internal Protected Reporting in Public Sector Institutions 2016 (Ministry of

					Justice)
<b>IA</b>	Anticorruption Programme Corruption Risks Register 2022 Annual Plan for Corruption Risks Assessment for 2023	-	-	-	Rulebook on Internal Protected Reporting in Public Sector Institutions 2016 (Ministry of Justice)  Rulebook on Protected External Reporting 2016 (Ministry of Justice)
<b>DSI D</b>	Integrity Plan of MoD 2021-2024	Code of Ethics 2025	-	Law on the Defence, Law on the Employees in the Ministry of Defence and several bylaws	Rulebook on the Protection of Whistleblowers 2016

What does the table show? In the following text, the indicators for each institution will be elaborated separately, and in the Discussion section below, they will be cross-referenced and compared with each other.

The MoI carries out activities related to the detection, prosecution, and prevention of criminal acts, maintenance of public order and peace, protection of human rights and freedoms, guarding and controlling the state border, and other activities determined by law (mainly the Law on Internal Affairs and the Law on Police). These legal acts list the duties of employees and the authorisations granted to them, which they may apply while performing their duties. Thus, according to the Law on Internal Affairs, employees of the Ministry are obliged (Article 6) to protect and safeguard the life and property of citizens, to respect human freedoms and rights, and to apply only those measures and means of coercion prescribed by law or other regulation. In performing their duties, employees must maintain high standards of personal integrity, professional ethics, and care for the protection of the public interest, and must comply with the acts regulating these standards (Art. 10). Employees are accountable to the Ministry for the consequences of their actions, inaction, or decisions, as well as for the quality, timeliness, and efficiency of their work (Art. 12). Furthermore, they must not allow their personal material or non-material interests to conflict with the public interest or their professional status, in accordance with the law (Art. 13). To this end, the Ministry, through its specialised unit — the Department for Internal Control, Criminal Investigations and Professional Standards (<https://mvr.gov.mk/mk-MK/ministerstvo/za-oddelot>) — implements a wide range of measures and activities aimed at addressing unprofessional, illegal, and unethical conduct by employees, as well as preventing such conduct through both proactive and repressive measures. The Ministry’s anti-corruption efforts are continuously focused on maintaining

achieved results, improving efficiency, and proactively narrowing the space for corrupt behaviour within the Ministry and the police. These efforts also seek to ensure that every specific case of illegal or unprofessional conduct by employees is detected and appropriately sanctioned. On its website, the MoI has published relevant documents for each indicator. Its current Integrity Plan concludes this year, while the preparation of a new plan for the period 2026–2028 is already underway, supported by DCAF – Geneva Centre for Security Sector Governance. The Ministry has also adopted an Anti-Corruption Programme 2025, which has been in place since 2017. The Ministry of Interior has a Code of Ethics adopted in 2021, as well as Guidelines on the Manner of Conduct of Elected and Appointed Persons and Employees in the Ministry of Interior to Prevent Conflicts of Interest, adopted in 2023. In addition, the Ministry has a bylaw regulating employee behaviour and mutual relations. Regarding employment, selection, and promotion, the Ministry, in addition to its Law on Internal Affairs and Law on Police, has developed detailed bylaws available on its website, covering the procedures for the selection of applicants for Ministry positions and police officers, as well as the assessment of employees' performance and career system. For the protection of whistleblowers, the Ministry has not developed its own bylaws but instead applies the Rulebook on Internal Protected Reporting in Public Sector Institutions, adopted by the Ministry of Justice in 2016. In the MoI, there is a designated person for advising on matters related to integrity, gifts, and conflicts of interest, as well as a person responsible for protected internal and external reporting in the Ministry.

The CA has a wide scope of responsibilities related to customs control, supervision, and customs clearance. On its website, the CA has published cases it has identified as carrying the highest risk of corruption, along with the potential consequences arising from corrupt practices. According to the Law on the Customs Administration, customs officers are required to uphold the highest standards of integrity, both personal and institutional, in the course of their interactions with the public, the business sector, state administration bodies, and other state institutions (Art. 72). Each customs officer bears personal responsibility for the performance of their duties and tasks. In cases of violation of official duty, customs officers may face disciplinary, misdemeanour, or criminal liability (Art. 73). On its website, the CA has published documents for only two indicators. It has adopted a Strategy for Integrity and the Fight Against Corruption (2025–2028), as well as an Integrity Policy in 2023. Regarding employment and promotion, there are no additional bylaws beyond the Law on the Customs Administration. Customs also has a Code of Conduct and Rules of Order and Discipline, adopted in 2021. However, no documents relating to the remaining indicators are available on its website. Customs has a designated person for protected internal reporting.

In accordance with the Law on Financial Police, the FP is responsible for safeguarding the financial interests of the Republic of North Macedonia by detecting and investigating criminal offences such as money laundering, illicit trafficking, smuggling, tax evasion, and other crimes involving unlawful property gain of significant value. It also protects the financial interests of the European Union by detecting and investigating criminal offences related to the misuse of funds from EU programmes received from the Union's budget (Art. 2). Financial police officers are required to perform their duties conscientiously, professionally, efficiently, and in a timely and orderly manner, in accordance with the Constitution, the law, and other regulations governing the Financial Police. They must carry out their work impartially, free from political influence or personal financial interest, and must not misuse their powers or status. Officers are also obliged to

protect the reputation of the Financial Police, to comply with its Code of Conduct and prescribed rules of order and discipline, and to refrain from using privileges or exemptions, or from requesting or accepting material or other benefits in the exercise of their official duties, as stipulated by law (Art. 41). On its website, the FP has published documents for four indicators, except for the conflict-of-interest indicator. It has adopted a single Annual Plan for the Prevention of Corruption in 2022. The FP has a Code of Conduct and a Code for Public Service Employees, both adopted in 2014. Regarding procedures for employment, selection, and promotion, in addition to the provisions in the Law on Financial Police, it has developed two detailed bylaws which regulate the method of assessing working abilities for employment as well as the evaluation of financial police officers' performance. For the protection of whistleblowers, the FP has its own bylaw — the Procedure on Protected Internal and External Reporting, adopted in 2020. The FP has a designated person for protected internal reporting, as well as a person for reporting misconduct, fraud, or corruption.

The FIU was established by the Law on Prevention of Money Laundering and Financing of Terrorism. The mandate of this institution is the collection and analysis of intelligence information on suspicious transactions and other information relevant to the prevention and detection of money laundering and the financing of terrorism. When there are grounds for suspicion of money laundering or financing of terrorism (Article 75), the FIU is obliged to submit the results of its analysis, together with all additional relevant information, to the competent authorities. As with other institutions, financial intelligence officers are obliged to perform their duties conscientiously, professionally, efficiently, promptly, and orderly, in accordance with the Constitution, the law, and other regulations. They must act impartially, without influence from political parties or personal financial interests, and must not abuse their powers or status. Furthermore, they are obliged to protect the reputation of the FIU, adhere to its Code of Conduct, and respect the prescribed rules of order and discipline. Officials may not use privileges or exemptions, nor seek or accept material or other benefits in the course of their official duties, as provided for by law (Article 91). On its website, the FIU has published documents for only two indicators. It has adopted three annual plans for the prevention of corruption covering the period 2021–2023. For the indicator relating to employment and promotion, there are no additional bylaws other than the provisions of the Law on Prevention of Money Laundering and Financing of Terrorism. Regarding the protection of whistleblowers, the FIU has developed its own bylaw — the Rulebook on Protected Internal Reporting — although there is no information available on the date of its adoption. The FIU has a designated person for protected internal reporting.

According to the Law on the National Security Agency, the NSA was established to protect the national security of the state, including the independence, sovereignty, constitutional order, and the fundamental freedoms and rights of citizens guaranteed by the Constitution of the Republic of North Macedonia, as well as other matters of national security (Art. 2). Article 64 stipulates that, to ensure transparent communication with the public, the Agency must publish on its website relevant regulations concerning its work, its organisational structure, publicly available annual reports, surveys and brochures within its scope of activities, public job advertisements, and similar materials. In practice, however, apart from general institutional information and news about the director's participation in events, no regulations or annual reports have been published. The NSA has therefore not provided documents on its website corresponding to the indicators required by law. Nevertheless, the website does contain a form through which citizens can report

misconduct by Agency employees. There are no additional bylaws for employment and promotion, in addition to the provisions in the Law on the National Security Agency. For the protection of whistleblowers, the Agency has not developed its own bylaws but instead applies the Rulebook on Internal Protected Reporting in Public Sector Institutions, adopted by the Ministry of Justice in 2016. There is a designated officer within the Agency responsible for handling protected internal reporting.

The IA was established by the Law on the Intelligence Agency. As a foreign intelligence service, its mandate is to collect intelligence information on threats and risks originating from abroad for the protection of national security, economic and political interests, independence, sovereignty, constitutional order, and the fundamental freedoms and rights of citizens guaranteed by the Constitution of the Republic of North Macedonia (Article 2). The Agency is authorised to collect, process, analyse, evaluate, exchange, store, and protect data and information of importance for the security, defence, foreign policy, and economic interests of the Republic of North Macedonia (Article 3). For transparent communication with the public, the Agency may publish on its website relevant regulations regarding its work, its organisational structure, and its budget and final accounts. It may also inform the public about certain security phenomena and events (Article 24). Employees of the Agency who violate work order and discipline or fail to fulfil their professional duties are subject to disciplinary, misdemeanour, and criminal liability (Article 91). On its website, the IA has published documents related to two indicators. Regarding the anti-corruption documents, the IA has published the Anti-Corruption Programme, the Corruption Risk Register (2022), and the Annual Risk Assessment Plan (2023). Regarding employment and promotion, there is no additional bylaw other than the provisions set out in the law. For the protection of whistleblowers, the IA refers to two regulations issued by the Ministry of Justice in 2016, which regulate protected internal reporting in public sector institutions and protected external reporting. The IA has a designated person responsible for protected internal reporting, although the name of the individual is not publicly disclosed, but an email address is provided for submitting reports.

Defence intelligence comprises measures, activities, and procedures undertaken to collect, document, and analyse intelligence data relevant to the defence of the Republic (Art. 133). Defence counterintelligence comprises measures, activities, and procedures aimed at detecting and preventing intelligence and other subversive activities by foreign military intelligence and security services, whether conducted within the country or from abroad, and directed against the defence of the Republic; detecting and preventing all forms of terrorist activity targeting the defence of the Republic; and ensuring counterintelligence protection of tasks, plans, documents, material and technical resources, areas, zones, and facilities of interest for the defence of the Republic (Art. 134). In performing these tasks, authorised officials have the right to collect data, reports, and information within their scope of work. They are also subject to disciplinary, misdemeanour, and criminal liability. Given that this Directorate is part of the MoD, the Law on Employees of the Ministry of Defence (Article 13) also applies to these employees, according to which they are obliged to maintain high standards of personal integrity, professional ethics, and dedication to the protection of the public and the interests of the Ministry. The law requires them to adhere to the Code of Ethics for Employees of the Ministry and the Army of the Republic of North Macedonia in their work and to ensure the impartial and objective application of laws and other regulations. They must carry out their responsibilities politically impartially and refrain from being influenced by personal

financial interests. Employees of the Ministry are personally accountable for the consequences of their actions, inactions, or decisions, as well as for the quality, timeliness, and efficiency of their assigned tasks (Art. 16). They must not place their personal, material, or non-material interests in conflict with the public interest or with their professional status, in accordance with the law (Art. 17). Furthermore, they may not manage, represent, or act on behalf of a political party, nor serve on its statutory bodies. Membership in a political party and participation in its activities must not compromise professionalism, impartiality, or legality in the performance of their duties within the Ministry (Art. 18). Since the DSID is an entity within the MoD, it does not have its own website; therefore, documents published by the Ministry also apply to the DSID. The Ministry website contains relevant documents for four of the examined indicators. The last available Integrity Plan, covering the period 2021–2024, has already expired, but the preparation of a new plan for 2026–2029 is underway, supported by a foreign partner — the Centre for Integrity in the Defence Sector from Norway. The MoD also adopted a Code of Ethics in 2025, but no documents relating to conflicts of interest are publicly available. With regard to employment, selection, and promotion, the Ministry has developed detailed bylaws that are accessible on its website, covering areas such as recruitment procedure, performance evaluation, and career progression from entry to middle and senior levels. For the protection of whistleblowers, the Ministry adopted its own bylaw, the 2016 Rulebook on the Protection of Whistleblowers. The Ministry has a designated person for protected internal reporting.

## **5. Discussion**

When examining the indicators, it becomes evident that the first indicator—the existence of integrity and/or anti-corruption strategies and plans—is largely met. All institutions, with the exception of the NSA, either currently have or have previously developed integrity and/or anti-corruption documents. At the same time, the institutions demonstrate different approaches in relation to this indicator. The MoI and the DSID, for example, have integrity plans in the form of strategic documents covering a three- or four-year period, from which annual action plans are derived. The CA follows a similar approach, with a four-year strategy addressing both integrity and anti-corruption. By contrast, the remaining institutions (FP, FIU, IA) have only adopted annual plans, which have not been updated since 2022/2023.

An analysis of the indicators reveals notable variations in institutional approaches regarding the Code of Ethics/Conduct. Four institutions (MoI, CA, FP, DSID) have adopted such documents, under different titles such as Code of Ethics, Code of Conduct, and Rules of Order and Discipline. This indicates compliance with the requirement for internal ethical standards.

With regard to conflicts of interest, only the MoI has a publicly available bylaw. This highlights a significant gap in the transparency and regulation of this area in the remaining institutions.

Regarding procedures governing selection, employment, and promotion, the MoI, FP, and DSID have adopted certain bylaws in addition to their laws. In the other institutions, only the respective laws govern these processes. If they have any bylaws, they might be classified. The absence of such publicly available regulations in other institutions raises concerns about the transparency of these procedures and the potential exposure to undue influence.

Whistleblower protection is addressed through two different models: reliance on the Rulebooks issued by the Ministry of Justice (MoJ, IA) or the adoption of institution-specific regulations (FP, FIU, DSID). This variation reflects both an effort to adapt protection mechanisms to institutional needs and a lack of harmonised practice across the security sector.

In summary, the table shows that the judicial police institutions (MoJ, CA, and FP) have better results in terms of the selected indicators; that is, they have a more developed legal and strategic framework concerning integrity, the fight against corruption, ethics, and procedures for employment and promotion. This shows that they are significantly more transparent and open compared to other institutions. However, a deeper analysis of their frameworks also reveals certain gaps, particularly the lack of continuity in the adoption of strategic documents. This means that the process of drafting, adopting, and implementing these documents is not sequential, consistent, or connected. Failure to adopt a new continuation of a strategic document carries the risk of a policy vacuum—the measures are no longer valid, and institutions lack guidelines for action in the specific area. This is mainly because strategic documents are often developed with foreign support (as can be determined by reviewing the documents); thus, after such support ends, the institutions do not continue the process independently. Consequently, the objectives and measures in these documents are, to some extent, no longer relevant or cannot be implemented in the current context and must be upgraded or revised.

In contrast, the security and intelligence institutions are more closed and show less satisfactory results in terms of the indicators. The NSA stands out as particularly non-transparent, as it does not publish any documents or data related to the selected indicators on its newly designed website. By contrast, the DSID shows more positive results, but this is mainly because it is an organisational unit within the MoD, meaning that all rules and procedures adopted by the Ministry also apply to the DSID. However, it is also noticeable that some of these acts are outdated in this institution.

## CONCLUSION

The literature review in the paper showed that institutional integrity is a fundamental factor for public trust in institutions and their efficiency, which affects both the prevention of and resistance to corruption. Integrity within an institution must be continuously maintained through a series of established functional mechanisms, and not only assessed by the absence of corrupt behaviour. Therefore, public institutions need to maintain consistency between their goals and mission, on the one hand, and their operational practices, on the other. If an institution fails to meet its goals, problems related to the reduction of control, transparency, accountability, public trust and reputation will arise. Effective institutional integrity depends on two things: both the integrity of each employee in the institution and the systemic protection mechanisms established within it. Therefore, in order to encourage and achieve institutional integrity, through which the occurrence of corruption will be prevented, comprehensive and continuous institutional activities are needed. These include proactively promoting ethical behaviour in all processes and levels of the institution, adopting and establishing clear functional mechanisms and rules against corruption, and practising transparent communication with the public about the institution's work. Broad institutional integrity provides a moral and functional basis for trust and support from citizens, thereby increasing institutional

legitimacy. In the security sector, the integrity of institutions is even more important, given that public trust is particularly vital for supporting their work and activities.

With this in mind, the paper analysed the anti-corruption and ethical standards of security sector institutions in North Macedonia, through five identified indicators. From the mapping and analysis of these indicators, the following conclusions can be drawn:

- Institutional approaches to each indicator differ in the scope, structure and continuity of strategic and legal documents.
- The absence of updated strategic documents creates policy gaps and risks of discontinuity in institutional integrity measures.
- Heavy reliance on foreign assistance for the development of strategic documents limits sustainability, as institutions rarely continue strategic processes independently.
- Judicial police institutions (MoI, CA, FP) demonstrate stronger legal and strategic frameworks for integrity, ethics and the fight against corruption compared to other institutions.
- Security and intelligence institutions are less transparent and show weaker results in fulfilling integrity-related indicators.
- All institutions, except the NSA, have developed strategies or plans for integrity and/or the fight against corruption.
- The NSA remains the least transparent, with no publicly available documents or data.
- The DSID performs better than other intelligence services due to its integration within the MoD.
- Only the MoI has its own publicly available bylaw on Elected and Appointed Persons and Employees in the Ministry of the Interior to Prevent Conflicts of Interest.
- Mechanisms for the protection of whistleblowers exist across institutions, generally using bylaws adopted by the Ministry of Justice, while some have developed their own.

Security sector institutions must align their legal and strategic frameworks with anti-corruption and ethical standards to strengthen overall institutional resilience. In this regard, several recommendations are inevitably imposed in relation to the set indicators:

- Security sector institutions should regularly update their strategies and plans, ensuring continuity between documents without a gap between two periods. In doing so, it is desirable to develop internal capacities for the preparation and monitoring of the implementation of strategies, instead of relying exclusively on foreign support. The model for the preparation and evaluation of integrity plans should ideally be unique and aligned with the recommendations of the State Commission for the Prevention of Corruption and EU standards.
- Existing codes of ethics and conduct should be harmonised in structure and substance throughout the security sector.
- All institutions should adopt and publish special bylaws for the prevention of conflicts of interest, with appropriate internal procedures for reporting and managing potential conflicts. In addition, for the purposes of transparency, it is necessary to ensure public availability of annual reports on reported and resolved cases of conflicts of interest.
- Each institution must have published detailed rulebooks governing all stages of recruitment and promotion, with a transparent performance appraisal system that

will serve as the basis for career progression and advancement. Institutions should enable external oversight or audit of recruitment processes to reduce the risk of nepotism and partisanship.

- Whistleblower protection procedures must be harmonised across institutions, in accordance with the Law on Whistleblower Protection and international standards. Institutions must appoint publicly available internal reporting persons, with clear contact information.

Finally, in terms of improving transparency and communication with the public, it is recommended that all security sector institutions publish documents related to integrity, anti-corruption, ethics, recruitment and reporting on their websites. In addition, they should introduce regular reporting to the public and civil society on the level of implementation of integrity and anti-corruption measures, as well as identified problems. In this way, institutions demonstrate a higher level of professionalism, accountability and commitment to the fight against corruption within their ranks. Furthermore, each institution must, in accordance with the law, establish clear standards for publishing information, especially through annual reports and work plans, which is recommended to be practised even by institutions where the law does not provide for this as an obligation.

## REFERENCES

- Gillian, B. (2014). Institutional Integrity, Corruption, and Taxation (March 13, 2014). Edmond J. Safra Working Papers, No. 39. <http://dx.doi.org/10.2139/ssrn.2408183>
- Heywood, P., and Rose, J. (2015). “Curbing Corruption or Promoting Integrity? Probing the Hidden Conceptual Challenge.” In *Debates of Corruption and Integrity*, 293. [https://drive.google.com/drive/folders/0Bx71cOP\\_3ncubWU3QVIzb0F2VVE](https://drive.google.com/drive/folders/0Bx71cOP_3ncubWU3QVIzb0F2VVE).
- Kirby, N. (2018). An ‘Institution-First’ Conception of Public Integrity. Working paper for discussion at the Building Integrity Workshop. [https://integrity.bsg.ox.ac.uk/sites/default/files/integrity/documents/media/public\\_institutional\\_integrity\\_conceptual\\_issues.pdf](https://integrity.bsg.ox.ac.uk/sites/default/files/integrity/documents/media/public_institutional_integrity_conceptual_issues.pdf)
- Kirby, N. (2022). Institutional Integrity: Its Meaning and Value. *Ethical Theory and Moral Practice* 25, 809–834. <https://doi.org/10.1007/s10677-022-10330-8>
- Law on Defence, Official Gazette of the Republic of Macedonia no. 42/2001; 5/2003; 58/2006; 110/2008; 51/2011; 151/2011 and 215/2015 and Official Gazette of the Republic of North Macedonia no. 42/2020
- Law on Internal Affairs, Official Gazette of the Republic of North Macedonia no. 160/2025
- Law on the Customs Administration, Official Gazette of the Republic of Macedonia no. 46/2004; 81/2005; 107/2007; 103/2008; 64/2009; 105/2009; 48/2010; 158/2010; 53/2011; 113/2012; 43/2014; 167/2014; 33/2015; 61/2015; 129/2015; 23/2016; 120/2018 and 248/2018 and Official Gazette of the Republic of North Macedonia no. 122/2021 и 3/2025
- Law on the Employees in the Ministry of Defence, Official Gazette of the Republic of North Macedonia no. 53/2024
- Law on the Financial Police, Official Gazette of the Republic of Macedonia no. 12/2014, 43/2014, 33/2015, 27/2016, 83/2018 and 198/2018 and Official Gazette of the Republic of North Macedonia no. 17/2025

- Law on the Intelligence Agency, Official Gazette of the Republic of North Macedonia no. 21/2021
- Law on the Prevention of Money Laundering, Official Gazette of the Republic of North Macedonia no. 151/2022, 208/2024 and 59/2025
- Lessig, L. (2013). "Institutional Corruption" Defined. *Journal of Law, Medicine & Ethics*. 2013;41(3):553-555. doi:10.1111/jlme.12063
- Marks, J., 'Institutional Ethics and Integrity', *The Perils of Partnership: Industry Influence, Institutional Integrity, and Public Health* (New York, 2019; online edn, Oxford Academic, 21 Mar. 2019), <https://doi.org/10.1093/oso/9780190907082.003.0002>
- Robinson, T., Cadzow, L. & Kirby, N. (2008). *Investigating Integrity: A Multidisciplinary Literature Review*, Working Paper. [https://integrity.bsg.ox.ac.uk/sites/default/files/integrity\\_literature\\_review\\_wp\\_05\\_2018.pdf](https://integrity.bsg.ox.ac.uk/sites/default/files/integrity_literature_review_wp_05_2018.pdf)
- Rose, J., Heywood, P. (2013). Political science approaches to integrity and corruption. *Humaff* 23, 148–159. <https://doi.org/10.2478/s13374-013-0116-6>
- Wueste, D. (2005). We Need to Talk....About Institutional Integrity. Publications. 13. [https://tigerprints.clemson.edu/phil\\_pubs/13](https://tigerprints.clemson.edu/phil_pubs/13)