

METHODOLOGY

for monitoring the implementation

of the National Strategy for Prevention of
Corruption and Conflict of Interest 2026–2030
and the Action Plan for its implementation 2026-2030



Funded by
the European Union



MACEDONIAN
CENTER FOR
INTERNATIONAL
COOPERATION

Title: Methodology for monitoring the implementation of the National Strategy for Prevention of Corruption and Conflict of Interest 2026–2030 and the Action Plan for its implementation 2026-2030

Publisher: Macedonian Center for International Cooperation (MCIC)

Authors: Snezhana Kamilovska Trpovska and Lejla Tutic (MCIC)

Translation from Macedonian to English: Evdokija Atanasovska

Design: Kontura DOO Skopje

Skopje, July 2026

This publication was funded by the European Union. Its contents are sole responsibility of the authors Snezhana Kamilovska Trpovska and Lejla Tutic and do not necessarily reflect the views of the European Union.

All rights reserved. Reproduction, copying, transmission or translation of any part of this publication may be made only under the following conditions: with prior permission of the publisher, for citation purposes and under the conditions set out below.

Copyright of this publication is protected, but the publication may be reproduced for educational purposes without any additional charges. For copying in other circumstances, for use in other publications, or for translation or adaptation, prior permission of the publisher should be provided.

Contents

1. Introduction	4
2. Purpose of the methodology	5
3. Scope of monitoring	6
3.1. Criteria for prioritization and intensity of monitoring the National Strategy	6
3.2. Institutional scope	7
4. Basic methodological approach for monitoring measures	8
4.1. Monitoring the level of implementation of activities	8
4.2. Monitoring the immediate effects of implementation	8
4.3. Monitoring the financial implications	9
5. Data sources and methods of data collection	10
5.1. Desk research	10
5.2. Reports by platform users	10
5.3. Request for access to public information	11
5.4. Additional qualitative methods	11
6. Assessment of the level of implementation: a traffic light system	12
7. Measuring effects: an approach based on a new practical situation	13
7.1. Effect – yes	13
7.2. Effect – limited or incomplete	13
7.3. Effect – cannot be assessed	14
7.4. Effect – no (there is no effect)	14
8. Financial monitoring of the implementation of the Strategy	15
8.1. Financial traffic light	15
9. Verification and cross-checking of data	17
10. Displaying data on the platform	18
10.1. Ranking of institutions	18
11. Risks associate with failure to adopt or implement the Strategy	19
11.1. Risks of failure to adopt the Strategy and Action Plan	19
11.2. Risk of standstill or insufficient implementation	19
12. Limitations of the Methodology	21
13. Concluding remarks	22

1. Introduction

Monitoring the implementation of the National Strategy for Prevention of Corruption and Conflict of Interest 2026–2030 is important not only to note what has been planned, but also to note what is actually being implemented, within what deadline, with what resources and with what results. Experience thus far has demonstrated that even the best-designed strategic documents do not bring about change on their own. Change depends on whether the measures and activities are being implemented, whether institutions take responsibility for their obligations, whether there is adequate financial support and whether the public can recognize a specific effect in practice. This methodology establishes a clear, practical and publicly understandable approach to monitoring the implementation of the Strategy and the Action Plan for its implementation. The monitoring will cover the entire Action Plan, that is, all measures and activities envisaged therein, whereby the activities will be monitored by varying intensity depending on their deadlines, significance, risks and data availability.

The methodology is based on several basic principles: comprehensive coverage of the Action Plan, clear criteria for prioritizing monitoring, verifiable findings, use of multiple data sources, cross-checking of information, a traffic light system for displaying the implementation status, monitoring of immediate effects and special monitoring of the financial support for the activities.

Special attention is being paid to the difference between formal fulfillment and actual change in practice. Therefore, the methodology is not limited only to the question of whether a certain activity has been completed, but also verifies whether its implementation has resulted in a new practical situation that can be observed, used or verified.

The monitoring results will be presented through an interactive public platform, which will provide for an insight into the status of the activities, institutions in charge, deadlines, effects, financial support and data sources. The platform will also provide for an institutional overview of the implementation, as well as the possibility of using information and reports submitted by users as an additional signal for verifying the situation in practice.

The methodology also takes into consideration the risks associated with a potential delay or failure to adopt the Strategy and Action Plan, as well as the risks of standstill or insufficient implementation after their adoption. In such cases, the monitoring will provide for an analysis of the reasons for the standstill, institutional action, transparency of the process and the factors affecting implementation.

This very methodology has been developed within the “Building a Corruption - Resistant Society” project, funded by the European Union, whereby a systematic monitoring of the implementation of the National Strategy and Action Plan will be carried out through an established mechanism for monitoring, evaluation and regular reporting.

2. Purpose of the methodology

The purpose of this methodology is to establish a clear, consistent and verifiable mechanism for monitoring the implementation of the National Strategy for Prevention of Corruption and Conflict of Interest 2026-2030. It should ensure:

- Whether the measures and activities in the Action Plan are implemented in accordance with the established deadlines and obligations;
- Whether the level of fulfillment of obligations by the institutions in charge can be determined, through a comparable overview of the number of measures and activities for which they are in charge and the level of their implementation.
- Whether the implemented activities have led to a new practical situation that can be observed, used or verified;
- Whether adequate budget support is provided for the measures and to what extent it is being implemented;
- Whether the public has access to systematized and comparable data on the level of implementation;

3. Scope of monitoring

The monitoring will cover the entire Action Plan for the implementation of the National Strategy for Prevention of Corruption and Conflict of Interest 2026–2030, that is, all measures and activities envisaged therein. The scope is not limited to specific areas, institutions or activities, but aims to provide a comprehensive and comparable insight into the level of implementation of the Strategy.

The basic component of analysis will be the activity, since it is the very activity in the Action Plan that is most clearly defined by an institution in charge, deadline, expected result and indicator. However, the findings will be summarized and presented at the level of measure, area/sector, institution in charge and the entire Strategy, in order to obtain a broader picture of progress and the distribution of obligations among institutions.

This approach enables the monitoring both the formal fulfillment of activities and the broader progress in the implementation of measures. It is particularly important as some of the measures are comprised of multiple activities, whereas in other cases the measure is reduced to a single activity. Therefore, the methodology does not create a parallel system, but rather builds upon the structure of the Action Plan and uses the already established activities, deadlines, institutions in charge and indicators.

3.1. Criteria for prioritization and intensity of monitoring the National Strategy

Even though the monitoring will cover the entire Action Plan, not all activities will be monitored with the same intensity in each reporting period. The reason for this is that the activities have different implementation deadlines, level of complexity and degree of readiness for their implementation, as well as specific relevance at a specific point in time.

The criteria established in this methodology are not intended to exclude certain measures or activities from being monitored, but to enable prioritization of monitoring, establishment of the data collection dynamics and determination of the level of detail of the analysis.

The following activities will be monitored with priority and in more detail:

- first, whose implementation deadline occurs in the current or next reporting period;
- second, whose implementation is a prerequisite for the implementation of other activities or measures;
- third, which are of significance for the public interest, transparency, accountability, integrity of institutions or prevention of corruption;
- fourth, for which there is a higher risk of delay, formal fulfillment without practical application or insufficient financial support;

- fifth, for which information, reports, media findings or other indications have emerged suggesting the need for additional verification.

Activities whose deadline has not yet been reached or for which there are insufficient grounds for detailed verification in the specific reporting period, will be recorded in the system and marked as activities which are not subject to detailed assessment in the given period. This approach ensures comprehensive coverage of the Action Plan, whereas resources are also rationally directed towards activities for which more in-depth monitoring is most relevant.

3.2. Institutional scope

The methodology will also provide for an institutional overview of the implementation. For each institution in charge, it will determine the number of measures and activities for which it is in charge, their implementation status, the degree of fulfillment of the obligations undertaken and, where applicable, the associated financial support.

The institutional overview will not only serve to count implemented and unimplemented activities, but also to better understand the distribution of responsibilities, the burden on institutions and potential delays in implementation. When interpreting the data, due consideration will be given to the number, deadlines, complexity and nature of the activities for which each institution is in charge.

This approach enables the demonstration of not only the overall progress in the implementation of the Strategy, but also the level of institutional responsibility and accountability in its implementation.

4. Basic methodological approach for monitoring measures

The methodology is based on three interrelated pillars: monitoring implementation, monitoring immediate effects and monitoring financial implications. The monitoring will cover the entire Action Plan, that is, all measures and activities envisaged therein. However, the activities will not be monitored with the same intensity in each reporting period.

4.1. Monitoring the level of implementation of activities

The first pillar refers to whether the activities in the Action Plan are being implemented in accordance with the envisaged deadlines, responsibilities and indicators. Both the formal and factual aspects of implementation are monitored: whether the activity has been started, whether it has been completed, whether it has been completed within the deadline and whether there is verifiable evidence thereof.

4.2. Monitoring the immediate effects of implementation

The second pillar focuses on effects, but at a realistic and verifiable level. Rather than claiming that each measure immediately reduces corruption or completely changes the behavior of institutions, it is being verified whether the activity has created a new practical situation that can be observed, used or verified.

This means that, if a law has been passed, it is verified whether there is a new and applicable normative framework; if an electronic module has been established, whether it is accessible and functional; if data publication has been envisaged, whether they are truly public, complete and usable.

By this approach, the methodology does not promise more than it can measure. Instead of broad and difficult-to-prove claims, it focuses on immediate results that can be convincingly documented.

4.3. Monitoring the financial implications

The third pillar is financial monitoring. This component is important since experience demonstrates that a good number of the measures remain on paper when there is no timely planning, allocation and use of funds. The very strategic framework has also indicated that insufficient budget planning and the absence of systematic monitoring of resources were weaknesses in previous cycles as well.

Financial monitoring will be carried out at two levels: at the level of an individual measure or activity and at the level of the entire Strategy. Twice a year, it will be verified whether the institution in charge has requested funds, the amount requested, whether the requested funds have been approved and what proportion of them has been utilized.

In this way, it is not only monitored whether a measure is formally implemented, but also whether it has been recognized as a budget priority and whether it has received real financial support. The financial status will be displayed separately from the implementation status, since an activity may be delayed due to lack of funds, but there may also be a reverse situation - funds have been provided, but the activity has not yet been implemented.

5. Data sources and methods of data collection

The monitoring will be based on a combination of primary and secondary data sources to ensure that the findings are as comprehensive, verifiable and cross-checked as possible.

5.1. Desk research

Desk research will be a continuous method for collecting and analyzing publicly available information. It will include a systematic review of official websites of institutions, the “Official Gazette”, reports, strategies, action plans, by-laws, decisions, protocols, manuals, public databases, registers, portals and budget documents.

This method will make it possible to regularly monitor formal progress, identify relevant evidence and determine whether the implemented activities have created a specific new situation in practice.

In addition, for the purpose of monitoring the effects, media releases, journalistic research, announcements, public appearances of institutions, reactions of stakeholders and other publicly available sources will be used. They will not constitute the sole basis for determining the implementation, but they will help to observe whether a certain activity has actually created a practical and visible change.

They will be particularly useful for recognizing effects that are already being felt in practice, for verifying whether the new solutions are actually being applied, and for determining the difference between formal fulfillment and the actual situation.

5.2. Reports by platform users

The methodology also envisages considering information submitted by platform users. This source is important since it brings in experiences from the field, that is, from citizens, organizations, media and professional communities which may indicate incomplete implementation of measures, practical problems in the functioning of new systems or a lack of publicly available information.

Such reports will not automatically be considered as confirmed evidence. They will serve as a signal of what needs to be further verified and cross-checked against other sources. Thus, the platform will not only serve as a place for publishing data, but also a channel for collecting information on how the measures work in practice.

5.3. Request for access to public information

One of the main instruments for additional data collection will be requests for access to public information. They will be used when there is insufficient publicly available information on the implementation status, when it is necessary to obtain documents and reports, when it is necessary to verify whether an activity has actually been implemented, as well as when it is necessary to determine whether the institution has requested, received and implemented funds.

This instrument will be particularly important for the financial component of monitoring, since data on budget planning and implementation of specific measures are often not presented clearly and in detail in publicly available documents.

5.4. Additional qualitative methods

In addition to the sources listed above, the methodology also envisages the use of qualitative methods for data collection, such as focus groups and semi-structured interviews with representatives of institutions in charge, civil society organizations, experts and other relevant stakeholders.

These methods will be used when a deeper understanding of the level of implementation is needed, when there are ambiguities or contradictory information from other sources, as well as to determine practical challenges in implementing the measures. The data obtained through these methods will not be used as the only evidence, but they will serve to supplement and cross-check against other sources of information.

6. Assessment of the level of implementation: a traffic light system



The status of each activity will be determined by a simple traffic light system with four categories: green, yellow, red and white.

The status of the activities is displayed through a visual traffic light system, which enables a clear and understandable monitoring of progress.

The system includes the following categories:

- Red – the activity has not been implemented or the deadline has expired without any progress;
- Yellow – the activity has been partially implemented or is being implemented with deviations;
- Green – the activity has been fully implemented with verifiable evidence;
- White – the activity has not yet reached its implementation deadline or is not subject to ongoing monitoring in the specific reporting period.

The status assessment is primarily given at the activity level, since the activity is the basic component of analysis in the methodology. If necessary, the assessments can also be aggregated at the level of a measure, area/sector, institution and the entire Strategy.

The methodology provides for priority monitoring of selected activities, based on their relevance, deadlines and expected effect. The activities for which the implementation deadline has not been reached or are not in the focus of monitoring in the given period are marked in white, without a detailed assessment of their status.

The traffic light assessments can be aggregated by institution in charge, in order to demonstrate what proportion of the activities for which the institution is in charge have been implemented, partially implemented, not implemented or still pending. This display will take into consideration the number, deadlines and complexity of the activities.

7. Measuring effects: an approach based on a new practical situation

Measuring the effects is carried out only for activities that are assessed as fully or partially implemented (green or yellow). For activities marked in red or white, the effect is not assessed by default, since the activity has either not been implemented or is not subject to a detailed assessment in the specific reporting period.

Measuring the effects will be based on one key question: has the implemented activity created a new practical situation that can be observed, used or verified? This question is asked after it has been determined that the activity has been implemented or at least partially implemented.

The assessment of the effect is not measuring the long-term impact, but refers to the immediate and verifiable results resulting from the specific activity. Depending on the response, three assessments will be used:

7.1. Effect – yes

This assessment is given when the implementation of a certain activity has led to a clear and visible change in practice. In other words, the assessment demonstrates that something specific has been done and that citizens can feel the change in practice. For clarification and by way of example, this refers to a situation where, as a result of an amended law that provides for a mandatory obligation thereto, information regarding public procurement procedures is publicly available, thereby enabling the public to have direct insight into the way public money is spent, which, in turn, directly reduces the possibility of misuse.

7.2. Effect – limited or incomplete

This assessment is used when there is a change, but it is limited, incomplete or not yet sufficiently functional. It may be the case when a law has been passed without by-laws, a module has been developed and it is not used, a working group has been formed and it is without activity, or data has been published and they are not complete and usable.

7.3. Effect – cannot be assessed

This assessment is used when the nature of the activity or its current stage does not allow for an immediate effect to be determined. When it comes to analytical or preparatory activities, it is often too early to say whether a new practical situation has been created.

7.4. Effect – no (there is no effect)

This assessment is used when the activity has been formally implemented, but sufficient time has passed, and it has not caused a new practical situation or a real change in the actions of the institutions.

The results of the assessment (measuring) of the effect for the implemented activities will be presented in a narrative form and made publicly available on the Interactive Monitoring Platform, as well as in the shadow reports.

8. Financial monitoring of the implementation of the Strategy

The financial monitoring is an integral component of the methodology and aims to provide for an insight into whether the planned activities are supported by adequate financial support and whether it is actually used. The monitoring is based on an analysis of budget planning, approval and implementation of funds for specific activities, by using data from public documents, requests for access to information and other relevant sources.

The financial monitoring is not carried out in isolation, but in connection with the assessment of the level of implementation in order to determine whether any potential shortage or inefficient use of funds affects the implementation of the activities.

The financial data will be monitored primarily at the activity level, and if necessary, they will be summarized at the level of measure, area/sector, institution and the entire Strategy. It will be verified whether funds have been requested for the activity, whether the funds have been approved, in what amount and to what extent they have been implemented, whereby the source of funding (whether the funds have been provided from the state budget or through external donors) will be separately recorded.

8.1. Financial traffic light

The level of financial support for the activities is displayed through a simplified traffic light system.

The following categories are used:

- Green – the funds have been requested, approved and mostly implemented;
- Yellow – the funds have been approved, but their implementation is delayed or there is a discrepancy between the requested and approved amount. The platform will include a separate explanation of where the delay has occurred;
- Red – the funds have not been requested, they have been rejected by the Ministry of Finance, or even though they have been approved, the implementation is 0%. The platform will display the specific reason (e.g. “rejected request” or “unallocated funds”);
- White – the financial monitoring is not relevant in the given period.



The financial assessment will be given separately from the assessment of the implementation of the activity. This is important since an activity may be delayed due to a lack of funds, but there may also be a reverse situation — the funds have been requested or approved, but the activity has not yet been implemented.

The financial traffic light will not represent an independent assessment of the institution's success, but rather an additional indicator of whether activities are supported by adequate resources and whether those resources are being used for the purpose of their implementation.

9. Verification and cross-checking of data

To ensure accuracy, each finding should be verified by at least two sources, whenever possible. Data on an implemented activity, for example, can be verified by an official document and a web announcement; data on practical effect by an official source and media or user confirmation; and financial data by a budget document and a response to a request for access to information.

Particular attention will be paid to the distinction among:

- formal fulfillment of the activity (existence of a document or decision);
- factual application (whether the solution is actually being used or implemented);
- existence and use of financial support.

This approach makes it possible to avoid that an activity is assessed as “implemented” only on the basis of formal evidence, without verifying whether there is actual application and practical result.

In cases where it is not possible to obtain confirmation from multiple sources, it will be clearly stated in the explanation of the assessment, in order to maintain transparency and indicate the limitations of the available data.

10. Displaying data on the platform

The monitoring results will be published and displayed on a public interactive platform. The platform will cover the entire Action Plan, that is, all measures and activities envisaged therein, with the possibility of varying degrees of detail depending on the reporting period, deadlines and data availability.

The data will be displayed at a minimum of four levels: individual activity, measure, area/sector and the entire Strategy. In addition, the platform will also provide for an institutional overview of the implementation.

For each activity or measure, the platform will contain: title, area/sector, institution in charge, deadline, indicator from the Action Plan, implementation status, effect assessment, financial status, short explanation, source or evidence and date of the last update.

The platform should provide for filtering by area/sector, institution, deadline, implementation status, financial status and effect assessment. It should also provide for aggregated displays of the number of green, yellow, red and white activities, an overview of financial data at the level of measure, institution, area/sector and the entire Strategy, as well as a section for reports or information by users.

10.1. Ranking of institutions

The interactive platform provides for a dynamic display of data through special ranking and filtering functions for the institutions in charge, in order to provide public insight into their efficiency in implementing the Strategy. The ranking system is based on two key parameters:

- **Time efficiency (meeting deadlines):** The function enables automatic generation of an overview of institutions according to the percentage of timely completed obligations (green status), as opposed to those for which delays beyond the planned deadlines or a complete standstill of action have been recorded (red status).
- **Substantial progress (measured effect):** This ranking establishes a distinction between institutions that have only formally fulfilled activities (such as adopting internal acts, plans or rules of procedure without practical application) and institutions whose implemented measures have generated actual changes and visible effects in practice.

By applying advanced filters, platform users can select institutions and activities that have been identified as critical points in the system, that is, those with the greatest delays or with the absence of a specific effect on anti-corruption policies.

11. Risks associate with failure to adopt or implement the Strategy

The methodology also takes into consideration the risks associated with the potential failure to adopt the National Strategy for Prevention of Corruption and Conflict of Interest 2026–2030 and the Action Plan for its implementation, as well as the risks of standstill, delay or insufficient implementation following their adoption.

11.1. Risks of failure to adopt the Strategy and Action Plan

If the Strategy or Action Plan have not been adopted within the stipulated deadline, the monitoring will be focused on analyzing the process of their drafting and adoption.

In that case, a special analysis will assess the course of the process, the reasons for the potential delay, the institutional action, the level of transparency, the involvement of relevant stakeholders and the factors that have influenced the delay.

This analysis will use the same sources and methods provided for in the methodology, including public documents, information obtained through requests for access to public information, desk research, media releases, interviews, focus groups and other relevant sources.

The findings of this analysis will be presented in the reports, as a separate analytical section, and if necessary, they may also be included in the interactive platform, in a form that corresponds to the nature of the process.

11.2. Risk of standstill or insufficient implementation

If the Strategy and Action Plan have been adopted, but standstill, delay or insufficient implementation of the planned activities occurs, the methodology will enable the identification and presentation of the main risks affecting the implementation.

Such risks may include untimely action by the institutions in charge, insufficient inter-institutional coordination, lack of financial resources, unclear competencies, limited



transparency, lack of data, changes in deadlines, as well as activities that have been implemented only formally, without practical application.

These risks will be identified by cross-checking data obtained from various sources, including official documents, responses to requests for access to public information, publicly available data, media releases, user reports, interviews and other relevant sources.

The risks will not be treated as an independent assessment of the success or failure of the institutions, but as an additional analytical element that helps to explain why certain activities are delayed, are implemented to a limited extent or do not create the expected practical effect.

The findings related to risks will be presented in reports and, where appropriate, on the interactive platform, in order to provide the public with insight not only into whether activities have been implemented, but also into the reasons for delays, standstill or limited effect.

12. Limitations of the Methodology

The methodology is designed to be realistic, verifiable and applicable, but it also has its limitations. The accuracy and comprehensiveness of the findings will depend on the availability, quality and timeliness of the data published or submitted by the institutions in charge.

In some cases, it may be difficult to precisely determine the level of implementation of the activity, in particular, when the information is incomplete, outdated or presented differently in different sources. In addition, for some activities, it may be difficult to isolate their immediate effect, in particular, when they are part of broader reform processes or depend on the implementation of other activities.

The financial monitoring also has limitations, since budget data are not always maintained or published at the level of an individual activity or measure. In such cases, there will be a need for additional cross-checking of data, request for information from institutions and careful interpretation of available financial data.

The methodology does not claim to measure the long-term impact of each activity on reducing corruption or on the overall functioning of institutions. Its focus is on verifying implementation, immediate effects and the existence of financial support.

This is the reason why assessments and findings will be based on available and verifiable information, and in cases where data is limited or cannot be confirmed by multiple sources, it will be clearly stated in the explanation. In this way, the methodology provides for a transparent approach and enables the public to understand not only what has been noted, but also on the basis of which data and what limitations.

13. Concluding remarks

This methodology provides for a framework for an objective assessment of the implementation of anti-corruption policies, making a clear distinction between the formal fulfillment of obligations and their substantial effect in practice. By applying the traffic light system and monitoring specific changes, it is possible to precisely locate institutional responsibility and the specific reasons for potential delays in implementation.

By establishing a system for generating comparable and verifiable data, the document serves as a basis for continuous monitoring of institutional obligations. The public availability of the findings and their transparent display through the interactive platform provide for an increased accountability of institutions, thereby positioning the methodology as a functional instrument for support and more efficient implementation of the National Strategy.

ANNEX 1: *National Strategy for Prevention of Corruption and Conflict of Interest 2026–2030 and the Action Plan for its Implementation 2026–2030 with established monitoring measures*

