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WHISTLE BLOWING-WAY TO CURB CORRUPTION IN BALKAN EU CANDIDATE COUNTRIES

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This article presents an overview of the progress in implementing anti-corruption framework in four candidate countries in Western Balkan: Albania, Macedonia, Montenegro and Serbia. The objectives of this paper are to determine what are the main obstacles in implementing these reforms.

As Balkan leaders take benefit of EU insecurity to spread and rise their power, they will continue to reduce democracy while continuing to seek EU membership. Whistleblower protection laws are a key way to expose corruption in these regimes, but only if they are actually enforced. In order to ensure optimum EU expansion, EU authorities must hold member states and candidates alike to the highest standards of whistleblower protection.

Albania, Macedonia, Montenegro, and Serbia are facing serious crises in their political development. These four Balkan nations, all current EU candidates, have made efforts to adopt whistleblower protection laws, an important step towards curbing corruption in the region. However, these regulations are rarely enforced and have had little impact. If the EU is committed to keeping Balkan authoritarianism in check, it must ensure that candidate countries adequately implement these laws and make efforts to encourage whistleblowing.

Keywords: Corruption, Democracy, Western Balkans EU candidates, Whistleblowing.

Introduction

Whistle-blowing has become a topic of interest during the last decades, for practitioners, politicians, and academics likewise. While whistle-blowing legislation dates back more than a hundred years in some countries and it is likely that some form of behavior that we would describe as whistle-blowing today existed since the beginning of human civilization, only in recent years it has been identified as a potential weapon against corruption, mismanagement, and general noncompliance with legal obligations by a broader public (Thüsing and Forst, 2016).

In the Western Balkans the responsibility for investigating and prosecuting corruption is spread out among numerous judicial, law enforcement and anti-corruption bodies. The fragmentation of punitive functions across institutions is not problematic per se, as long as these institutions can operate free from undue political interference and are able to cooperate and coordinate activities effectively. Unfortunately, experience in the region demonstrates that this is not the case, making these bodies more susceptible to manipulation and less able to perform their functions. Key problems include institutional overlap in fighting and preventing corruption (Kosovo, Serbia), limited cooperation between the prosecution and police (Kosovo, Macedonia, Montenegro, Serbia) and regular infighting between key judicial and law enforcement actors (Albania, BiH). The region also suffers from widespread political interference in

appointments, transfers and removals of judges, prosecutors and police, as well as unwarranted interference in the day to-day operation and decision-making processes of anti-corruption and judicial bodies.

As a result, the region holds a very poor track record for prosecuting corruption, especially among high-level public officials. Even when such cases are investigated, they generally suffer long delays and often end in acquittals or result in light and inconsistent sentences (Albania, BiH, Montenegro, Serbia). Indictments are often poorly written and inadequately investigated, while complex corruption cases are poorly understood by prosecutors and judges (Albania, Kosovo) (McDevitt, 2016).

Definition of Corruption

The origin of 'corruption' comes from the Latin terms corruptus, or corrumpere which mean spoiled or break into pieces, accordingly. Corruption occurs at all levels of society and at all forms – public, private, locally, nationally and internationally. In an age of globalisation, transactions often transcend national boundaries, which increase the opportunities for corruption. Nonetheless, an international definition of 'corruption' does not exist, as this would raise legal and political complications. Consequently, different interpretations of 'corruption' are given by multiple jurisdictions according to their own cultural conceptions.

There is much less agreement as to the definition of corruption. Transparency International has defined the phenomenon as "the abuse of entrusted power for private gain." The gain can be financial as well as nonmonetary (United Nations Global Compact, 2017). The United Nations, in its Global Compact against Corruption, has not chosen to develop its own definition. Yet there are limitations on this widely used definition. As this paper shows, corruption often involves more than public officials but includes private actors who behave in corrupt ways. Moreover, limiting corruption exclusively to the state sector is difficult in most developing and communist and former communist countries, as there is an absence of clear boundaries between state officeholders and private business (Wedel, 1998).

Much of the definitional work and analyses of corruption are supported by development organizations such as the Organisation for Economic Cooperation and Development, the World Bank, and Transparency International.

Therefore, the focus is on economic growth rather than on many other salient and damaging effects of corruption such as governance, rule of law, and problems of access to justice (Hindess, 2012).

OECD explains corruption as "the abuse of a public or private office for personal gain. The active or passive misuse of the powers of Public officials (appointed or elected) for private financial or other benefits" (OECD Glossaries, 2008).

The World Bank defines corruption as "the abuse of public office for private gain" (Bhargava, 2006).

Transparency International (TI) defines it as the "misuse of entrusted power for private gain. It hurts everyone who depends on the integrity of people in a position of authority" (Transparency International).

The genealogy of the definition of corruption in the European Union, as Patricia Szarek Mason demonstrated in her book is more complicated (Szarek-Mason, 2010). In 1995, the European Parliament defined corruption as "the behaviour of persons with public or private responsibilities who fail to fulfil their duties because a financial or other advantage has been granted or directly or indirectly offered to them in return for actions or omissions in the course of their duties" (European Parliament, 1995). After, in 1997, the definition was changed to "Any abuse of power or impropriety in the decision making process brought about by some undue inducement or benefit" (Commission of the European Communities, 1997). In 2003, the European Union returned to the most simple definition: 'abuse of power for private gain' and including thereby both the entire public and private sector" (Commission of the European Communities, 2003).

Explaining Corruption: The Rational Economic, Political Science and Legal Approaches

The causes of corruption and their subsequent solutions currently fall under three broad approaches; these are the rational economic, political science and legal approaches.

The rational economic approach assumes that individuals, organizations and states simply act out of self-interest. This view has dominated much of the debate about corruption and often proposes that the best way to reduce corruption is to reduce the incentives to break rules by increasing the chances of being found out and by reducing the avenues for corruption in the first place (Philp 2015). Ultimately self-interest is the desire to acquire, ruin and appropriate all other individuals and organizations.

For those who adopt the political science point of view, the ultimate source of corruption is rent-seeking, which is where individuals/organizations seek to increase their own wealth without producing new wealth, such as lobbying for state subsidies, imposing regulations on a competitor, or a tax official seeking and accepting a bribe to reduce tax owed by an individual/organization. Rent-seeking occurs in the public sector and is likely to occur where restrictions and state intervention lead to profits (Warner 2015). Political systems, however, can be corrupt from the top down—hence the refrain 'the fish rots from the head'; but it can also occur from the body where it can undermine the political process and suborn those in public office via bribes, lobbying and blackmail. This is in reference to Johnston (Johnston 2005) and his view that there are four major syndromes of corruption, which are the ability to influence markets, elite cartels, oligarchs and clans and official moguls.

A legal approach suggests that the causes of corruption are mostly in the public sector where vested interests have the ability to prevent, and/or block the enforcement of legal and/or regulatory rules. The problems with this approach are obvious when understanding how those with powerful influences shape the creation and operation of the law, which can result in justifying inertia in the law when any changes in legislation would conflict with their own interests. In light of this legal definition, corrupt acts come to be viewed as an inappropriate yardstick; instead they are more useful as measures of the influence of power than corruption (Brooks et al. 2013).

The Concept of Whistleblowing and Whistleblower Protection in Balkan EU Candidate Countries

Whistleblowing is the disclosure of information by an employee or contractor alleging will ful misconduct carried out by an individual orgroup of individuals within an organization (Figg 2000). As insiders,whistleblowers are the source of valuable information that neither the government nor the public can get from oversight systems. They are knowledgeable people who know precisely what their organizations are doing. Therefore, whistleblowing is an important means of improving government transparency and accountability (Apaza and Chang, 2017).

Near and Miceli (1995) defined effectiveness in whistleblowing as "the extent to which the questionable or wrongful practice (or omission) is terminated at least partly because of whistle-blowing and within a reasonable time frame". Dworkin and Baucus (1998) suggested that effectiveness is attained "if the organization launched an investigation into the whistleblower's allegations—on their own initiative or required by a government agency, or if the organization took steps to change policies, procedures, or eliminate wrongdoing".

Apaza and Chang (2011) define effective whistleblowing as an action which:

(1) makes the organization launch an investigation;
(2) causes it to take steps to change policies or procedures;
(3) terminates the wrongdoing within a reasonable time frame; and
(4) results in no retaliation to whistleblowers, due to the availability of appropriate legal protection.

In other words, they identified five factors known to affect whistleblowing:

(1) Type of whistleblowing
(2) Role of mass media

(3) Documentation of evidence
(4) Retaliation
(5) Legal protection (Apaza and Chang, 2011).

Research suggests that the presence (or absence) of these factors creates similar effects in different countries despite differences in cultural and social settings.

The 2014 Ministerial Council decision on prevention of corruption encourages the participating States to:

- further develop and implement preventive anti-corruption legislation and policies;
- adopt, maintain and strengthen systems that prevent conflicts of interest in the public sector;
- foster the involvement of the private sector, civil society organizations, the media and academia in developing national anti-corruption strategies and policies;
- intensify individual national efforts to provide sufficient protection for whistleblowers;
- take the necessary steps to establish or enhance appropriate systems of public procurement; and
- facilitate the recovery of stolen assets (Decision No.5/2014).

The risk of corruption is significantly higher in environments where the reporting of wrongdoing is not supported or protected, especially in the workplace. The importance of whistleblower protection was reaffirmed at the global level by the Group of 20 (G20) Anti-Corruption Working Group, which recommended that the G20 leaders use the OECD-developed Guiding Principles for Whistleblower Protection Legislation and the Compendium of Best Practices, (G20 Anti-Corruption Action Plan, 2012) as a reference for enacting and reviewing their whistleblower protection rules. The OECD has also developed the brochure Whistleblowers protection: encouraging reporting (OECD, 2012) including a checklist and implementation guidance on whistleblower protection systems.

Whistleblowing as Effective Way to Curb Corruption

Albania, Macedonia, Montenegro, and Serbia have all made superficial efforts to fight corruption and decrease authoritarianism. In reality, these facades merely improve their leaders' international reputations without helping the lives of everyday citizens. Under present circumstances, these countries must explore alternative ways to meet EU accession criteria. One of the most effective ways to curb corruption and weaken authoritarian regimes is by encouraging whistleblowing. In situations where bribery and corruption are prevalent in private and public sectors, individuals must feel safe to report offenses they may witness.

Successful whistleblowing often requires two main conditions:

1. effective safeguarding legislation and
2. widespread public education (Transparency International).

As Agnes Batory explains, "whistleblower protection can also be considered as a way of influencing the cost–benefit calculus of individuals (whether public officials or ordinary citizens), to report corruption-related crimes[…] Rather than imposing a duty to report and punishing offenders, it tries to remove, or at least ameliorate, the negative consequences that would otherwise likely follow the decision to speak out" (Batory, 2012). For many potential whistleblowers, the choice to report corruption is not just one of morals or conviction. Whistleblowers often risk their careers, reputations, and even lives in order to expose wrongdoings, and it is up to legislators to make sure these individuals are protected.

For EU candidate countries, enacting whistleblower protection laws is a tangible step towards decreasing corruption, thus helping those countries meet EU accession criteria. Chapter 23 of the EU Acquis states, "Member States must fight corruption effectively, as it represents a threat to the stability of democratic institutions and the rule of law. A solid legal framework and reliable institutions are required to underpin a coherent policy of prevention and deterrence of corruption" (European Union Conditions for Membership). The EU recognizes whistleblower protection as a key element of this deterrence.

In their yearly assessments of candidate countries, EU officials take note of whether or not the country has passed whistleblower protection laws. Because of this, all four Western Balkan candidates have attempted to improve their whistleblower protection legislation, but these laws alone have yet to create any meaningful culture change. In situations where whistleblower legislation has been passed, but not enforced, corruption can easily go unchecked.

Table 2. Functions of the primary anti-corruption bodies in the Western Balkans

Function	Policy Coordination	Prevention	Education	Political Finance Oversight	Investigation	Prosecution
Albania: High Inspectorate for the Declaration and Audit of Assets and Conflicts of Interest (HIDAACI)	No	Yes	Partially	No	No	No
Macedonia: State Commission for the Prevention of Corruption (SCPC)	Yes	Yes	Yes	No	Partially	No
Montenegro: Agency for Prevention of Corruption	Yes	Yes	Yes	Yes	No	No
Serbia: Anti-Corruption Agency	Yes	Yes	Yes	Yes	Partially	No

In the European Commission's 2016 reports on all four Western Balkan candidate countries, they acknowledge progress in the realm of whistleblower protection. Albania, Macedonia, Montenegro, and Serbia have all passed rudimentary whistleblower protection laws in the last two years. Serbia adopted a Whistleblower Protection Act in November 2014, Macedonia in November 2015, Montenegro in December 2015, and Albania in June 2016. Despite these advancements, the EU is still not happy with the region's progress in decreasing corruption. In Albania, it was noted that "corruption remains prevalent in many areas and continues to be a serious problem" (European Commission, 2016). The Commission is not yet satisfied with Macedonia's legislation, concluding that "substantial legal, institutional, and practical preparations are still needed for effective implementation of the law" (European Commission, Macedonia Report, 2016). In Serbia, they saw "limited results from the implementation of adopted legislation", (European Commission, Serbia Report, 2016) and in Montenegro, not only did the Commission report evidence of corruption, but they uncovered one case in which the Anti-Corruption Agency was criticized publicly for their reactive and contentious interpretation of the law (European Commission, 2016). As these reports illustrate, merely passing whistleblower protection laws is not sufficient. Although the EU reports did not explain whether this shortcoming is specifically the result of a law enforcement failure or lack of public education, it is presumably a combination of the two. Some

individuals may argue that laws like this simply need time to create change, but positive change is unlikely to happen on its own considering the political situation in the Western Balkans. Just like the leaders of these countries, the current whistleblower laws may appease EU stakeholders, but they are not doing enough to benefit the lives of citizens domestically.

There are no consistent whistleblower protection laws across member states, and many countries regulate whistleblowing simply through labor, commercial, or criminal law (Eisanen, 2016). This strategy may make sense for individual countries, but it creates confusion when examined holistically. Additionally, EU institutions themselves lack necessary whistleblowing regulations. The European Parliament adopted their first internal whistleblower protection rules in January 2016, but these laws fail to protect MEP assistants- individuals who would be best positioned to expose wrongdoings within the European Parliament (Hanot and Associates, 2016). If EU institutions expect candidate countries to protect whistleblowers, they should hold their members to the same standards.

As Western Balkan leaders take advantage of EU instability to increase their authority, they will continue to weaken democracy while continuing to seek EU membership. Whistleblower protection laws are a key way to expose corruption in these regimes, but only if they are actually enforced. In order to ensure optimum EU expansion, EU authorities must hold member states and candidates alike to the highest standards of whistleblower protection.

Albania, Macedonia, Montenegro, and Serbia are facing critical junctures in their political development. These four Western Balkan nations, all current EU candidates, have made efforts to adopt whistleblower protection laws, an important step towards curbing corruption in the region. However, these regulations are rarely enforced and have had little impact. If the EU is committed to keeping Balkan authoritarianism in check, it must ensure that candidate countries adequately implement these laws and make efforts to encourage whistleblowing.

Table 3. Anti-Corruption Institutional Framework

	Corruption Perception Index by Transparency International:	Government Effectiveness (from -2,5 to +2,5), World Governance Indicators by World Bank:	Control of Corruption (from -2,5 to +2,5), World Governance Indicators by World Bank:	Index of Economic Freedom by Heritage Foundation	Corruption (1=best, 7=worst), Nations in Transit by Freedom House:	Democracy Score (1=best, 7=worst), Nations in Transit by Freedom House:
Albania	36/100 (2015)	0,03 (2015)	-0,44 (2015)	65.9/100 (2016)	5.25 (2016)	4.14 (2016)
Macedonia	42/100 (2015)	+0,13 (2015)	-0,13 (2015)	67.5/100 (2016)	4.50 (2016)	4.29 (2016)
Montenegro	44/100 (2015)	+0,16 (2015)	-0,09 (2015)	64.9/100 (2016)	5.00 (2016)	3.93 (2016)
Serbia	40/100 (2015)	+0,11 (2015)	-0,24 (2015)	62,1/100 (2016)	4.25 (2016)	3.75 (2016)

Albania

In Albania, no type of corruption risk assessment is provided as mandatory or recommended by law, but a risk assessment methodology to be used by institutions was prepared under the PACA project funded by the European Union and implemented by the Council of Europe (Council of Europe, 2010). It includes the

risk assessment overview and draft examples of documents, with the emphasis on several sectors with a high risk of corruption.

In Albania, the most important human rights problems were related to corruption in all branches of government, particularly in the judicial and health-care systems, but also in the field of media freedoms.

Widespread corruption, many forms of pressure and intimidation, combined with limited resources sometimes prevented the judiciary from functioning independently and efficiently. Moreover, persons holding high-ranking positions such as politicians, judges, and those with powerful business interests often were able to avoid prosecution (European Western Balkans, State Department, 2017).

According to recent assessments, some of the greatest challenges compromising the country's integrity are the implementation gaps in its anti-corruption legal framework, the lack of judicial impartiality and low professionalism of its law enforcement.

Montenegro

In Montenegro, integrity plans have been introduced as the main corruption risk assessment tool (Directorate for Anti-Corruption Initiative of Montenegro). As regards the legal basis for the introduction of the integrity plans, Article 68 of the amended Law on Civil Servants and State Employees from July 2011 provides for the obligation of the Montenegrin public administration to adopt an integrity plan, the obligation of the administration authority in charge of the anti-corruption activities to prepare guidelines and the obligation of the entities to determine a civil servant responsible for preparing and implementing the integrity plan.

Integrity plan is seen as an internal and anti-corruption preventive measure as well as an institution's internal anti-corruption document which contains a set of measures of legal and practical nature. It is aimed at preventing and eliminating the possibility of occurrence and development of different forms of corrupt behaviour within the authority as a whole, certain departments and individual positions. It comes as a result of selfassessment of the exposure of an authority to the risks of occurrence and development of corruption, illegal lobbying, conflict of interest and ethically and professionally unacceptable behaviour.

Furthermore, capacity of the organisation is improved to protect itself from possible impact of corruption on the performance of its primary and secondary activities (Selinšek, 2015).

Montenegro is in the phase of implementation of the system of integrity plans into the practice of Montenegrin public sector institutions. Integrity plans are well developed in theory (and very transparent); however, Montenegro is advised to monitor closely the practical implementation of this CRA model and to make further improvements based on the indentified issues.

Corruption was among the country's most significant human rights problems. It was present in health care, education, and other branches of government, including law enforcement agencies and the courts. The process of appointing judges and prosecutors remained somewhat politicised (European Western Balkans, State Department, 2017).

Serbia

Serbia has already managed to identify some important obstacles and the issues in the integrity plans implementation. The Serbian system of integrity plans is well outlined; however, Serbia is encouraged to properly address the identified issues (including the sanctions for noncompliance with the obligation to implement the quality integrity plan) and to strengthen the capacity of its Anti-Corruption Agency given that it is the crucial institution for the success of the selected corruption risk assessment approach. It constitutes a group of legal and practical measures planned and undertaken in order to eliminate corruption and to prevent opportunities for it within an organization (work or activity) as a whole, individual organizational units/parts and work places (Agency for fight against corruption of the Republic of Serbia).

An inefficient judicial system that caused lengthy and delayed trials as well as long periods of pretrial detention adversely affected citizens' access to justice. The report adds that the courts remained susceptible to corruption and political influence. Despite the government saying that it is fighting the corruption, it still provides a lack of transparency (European Western Balkans, State Department, 2017).

Macedonia

The country is member of the Group of States against Corruption (GRECO) since 2000. Key important instruments in the upgrading of the legislative framework for the fight against corruption are represented by the ratification of two Council of Europe conventions – the Criminal Law Convention against Corruption (1999), the Civil Law Convention against Corruption (2002) and the Additional Protocol of Criminal Law Convention on Corruption (2005) (Nuredionska and Associates, 2014). In 2007 Republic of Macedonia has ratified the UN Convention Against Corruption (UNCAC).

In Republic of Macedonia, State Programme for Prevention and Repression of Corruption and State Programme for Prevention and Reduction of Conflict of Interests with Action Plans for the period 2011 – 2015 recognized the necessity of more efficient and systematized measures for prevention of corruption on the level of public administration institutions. As a response, the proposed draft amendments and addenda to the Law on Prevention of Corruption contain provisions organized in a new chapter – Integrity System, where the integrity system is defined as a sum of all policies, standards and procedures that are established in the institutions which also include corruption risk assessment and strategy for risk elimination.

The corruption is a spread phenomenon in the Republic of Macedonia. Even 77% of the people expect that in their interaction with the public institutions they will face corruption. More than one fourth of the people were asked for some form of bribery and one in five people paid bribery or gave some gift or counter-service.

Republic of Macedonia has recognized the corruption risk assessment as one of the instruments that is expected to improve corruption prevention in the public sector institutions. It also plans to introduce the concept of the integrity system through the amendments to the Law on Prevention of Corruption. Republic of Macedonia is encouraged to adopt the adequate legal basis for a nation-wide concept of integrity with the corruption risk assessment, taking into account the existing legal and institutional framework already in place (particularly the Law on Public Internal Financial Control). Within its practical implementation, good practices in (corruption) risk assessment already developed in certain public sector institutions should be also considered (Selinšek, 2015).

Conclusion

Despite having made positive steps towards EU accession, these four candidate countries are still plagued by pervasive corruption and captured political systems. Last year, Freedom House reported that democracy in the Balkans has declined for six years in a row, in contrast to the region's steady increase in democracy scores from 2004 to 2010. The Balkan sub-region's average democracy score is now the exact same as it was in 2004. More specifically, analysts have criticized the leaders of Serbia, Macedonia, and Montenegro for exploiting the EU's volatility, "trusting that its longing for stability will outweigh clear evidence of individual politicians and parties capturing the state to promote their own interests". (Schenkkan, 2016). If the downward trajectory of the past six years continues, this generation of Western Balkans rulers could potentially reverse the region's democratic progress.

Given these four countries' current regimes, it is unlikely that their governments will do much to ensure that whistleblower protection laws are effectively enforced. If the EU wants to prioritize candidate countries' progress, then the European Commission should ensure that whistleblowers in the Balkans are adequately protected. Unfortunately, this may be a difficult feat, seeing as whistleblower protection is rarely enforced even within EU member states.

The difficulties to identify corruption are clear signal towards the public institutions for developing information context on the various corruption forms that will be easily accessible (physically or online) in the space where there is interaction between the servants/ officers and the clients.

This should not be understood only as time-bound campaign but as a long-term education of the servants/ officers and the clients.

References

1. Agency for Fight against Corruption of the Republic of Serbia (2017), available at: http://www.acas.rs, where more data on the Serbian system of integrity plans is available.
2. Apaza, C., & Chang, Y. (2011). What makes whistleblowing effective: Whistleblowing in Peru and South Korea. Public Integrity, 13(2).
3. Barry Hindess, (2012). "Introduction: How Should We Think about Corruption?," in *Corruption: Expanding the Focus*, ed. Manuhuia Barcham, Barry Hindess, and Peter Larmour, Canberra: Australian National University.
4. Batory, A. (2012) "Why Do Anticorruption Laws Fail in Central Eastern Europe? A Target Compliance Perspective, *Regulation & Governance (2012)*, available at:

   https://www.researchgate.net/profile/Agnes_Batory/publication/230545880_Why_Do_Anti-Corruption _Laws _Fail_inCentral_Eastern Europe_A_Target_Compliance_Perspective/links/54b641cb0cf2318f0f9a29b1.pdf
5. Bhargava, V. (2006), "Curing the Cancer of Corruption", available online at:

   http://siteresources.worldbank.org/EXTABOUTUS/Resources/Ch18.pdf
6. Brooks, G., Walsh, D., Lewis, C., & Kim, H. (2013). *Th e prevention of corruption:Investigation, enforcement and governance* . Basingstoke: Palgrave Macmillan.
7. Carmen R. Apaza, Yongjin Chang (Ed), (2017). Whistleblowing in the world-Governent Policy, Mass Media and the Law, Palgrave Macmillan.
8. Commission of the European Communities (1997), 'Communication from the Commission to the Council and the European Parliament on a Union Policy Against Corruption', available at: http://goo.gl/c3Cnw.
9. Commission of the European Communities (2003), 'Communication from the Commission to the Council, the European Parliament and the European Economic and Social Committee on a Comprehensive EU Policy against Corruption', available at: http://goo.gl/YK5PQ.
10. Council of Europe (2010), Project against corruption in Albania (PACA), Technical paper on 'Corruption Risk Assessment Methodology Guide' [authors: Quentin Reed, Mark Philp], available at: *http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/Albania/Technical%20Papers/PACA _TP%202%202011-Risk%20Assessment%20Methodology.pdf*.
11. Council of Europe. (n.d.). What is GRECO. Retrieved from:

    http://www.coe.int/t/dghl/monitoring/greco/general/3.%20What%20is%20GRECO_en.asp
12. Directorate for Anti-Corruption Initiative of Montenegro, *http://antikorupcija.me/en*, where also more data on the Montenegrin system of integrity plans is available.
13. Dworkin, T. M., & Baucus, M. S. (1998). Internal vs. External Whistleblowers: A Comparison of Whistleblowing Processes. Journal of Business Ethics, 17(12).
14. Eisanen, K. (2016), "Whistleblowing- Need for Harmonization on the European Union Level?", *European Union Law,* available at: http://www.doria.fi/handle/10024/129871
15. European Commission (2016) "Albania 2016 Report", p. 17: http://ec.europa.eu/neighbourhood-enlargement /sites /near files.pdf/key_documents/2016/20161109_report_albania.pdf
16. European Commission, (2016) "The Former Yugoslav Republic of Macedonia 2016 Report", p. 17 available at: http://ec.europa.eu/neighbourhood- enlargement sites near/ files pdf/key_documents 2016/20161109 report_the _former_yugoslav_republic_of_macedonia.pdf
17. European Commission, "Montenegro 2016 Report", p.58, available at: http://ec.europa.eu/neighbourhood-enlargement /sites /near/files/pdf/key_documents/2016/20161109_report_montenegro.pdf

18. European Commission, "Serbia 2016 Report", p. 15: http://ec.europa.eu/neighbourhood-enlargement /sites/near /files/pdf/key_documents/2016/20161109_report_serbia.pdf
19. European Commission. (2011). Report from the Commission to the Council on the modalities of European Union participation in the Council of Europe Group of States against Corruption (GRECO). COM (2011) 307 final.
20. European Parliament (1995), 'Resolution on combating corruption in Europe', available http://goo.gl/MDsjXS.
21. European Western Balkans, State Department (2017), Widespread corruption prevents progress in Western Balkans, available at: https://europeanwesternbalkans.com/2017/03/05/state-department-widespread-corruption-prevents-progress-in-western-balkans/.
22. Figg, J. (2000). Whistleblowing. Internal Auditor, 57(2), 30–37.
23. G20 Anti-Corruption Action Plan, (2012), Protection of Whistleblowers, Study on Whistleblower Protection Frameworks, Compendium of Best Practices and Guiding Principles for Legislation, available at:

    http://www.oecd.org/g20/topics/anti-corruption/48972967.pdf
24. Gregor Thüsing, Gerrit Forst (Ed.), (2016). Whistleblowing -A Comparative Study, Springer International Publishing Switzerland.
25. Hanot, Clara; Jacobs, Thomas; & Strunk, Caroline, (2016) "Whistleblower Protection in the European Parliament and EU Member States". *Transparency International*: available at:

    http://www.transparencyinternational.eu/wp-content /uploads/ 2016/09/CoE-Final-WB.pdf
26. Janine R. Wedel (1998). *Collision and Collusion: The Strange Case of Western Aid to Eastern Europe, 1989–1998,* New York: St. Martin's Press.
27. Johnston, M. (2005). *Syndromes of corruption: Wealth, power and democracy*. Cambridge: Cambridge University Press.
28. Near, J. P., & Miceli, M. P. (1995). Effective Whistle-Blowing. The Academy of Management Review, 20(3).
29. Nuredionska, E. et all. 2014. National Corruption Assessment Report. Macedonian Centre for International Cooperation
30. OECD (2007), Corruption: a glossary of international criminal standards.
31. OECD Glossaries, (2008), "Corruption", A Glossary of International Standards in Criminal Law, OECD Publishing.
32. OECD, (2012), Whistleblower protection: encouraging reporting, CleanGovBiz-Integrity in practice, available at: http://www.oecd.org/cleangovbiz/toolkit/50042935.pdf
33. Organization for Security and Co-operation in Europe, Ministerial Council, (2014), Prevention of Corruption, Decision No. 5/14 on Prevention of Corruption, Basel.
34. Philp, M. (2015). The definition of political corruption. In P. M. Heywood (Ed.), *Routledge handbook of political corruption* . London: Routledge.
35. Schenkkan, N (2016), "Nations in Transit 2016: Europe and Eurasia Brace for Impact", Freedom House, available at: https://freedomhouse.org/sites/default/files/FH_NIT2016_Final_FWeb.pdf
36. Selinšek, L (2015), Corruption Risk Assessment in Public Institutions in South East Europe-Comparative Research and Methodology, Regional Anti-corruption Initiative for the Southeast Europe 2020 Strategy, Cooperation, Council Trg Bosne i Hercegovine, Sarajevo.
37. Transparency International: https://www.transparency.org/topic/detail/whistleblowing
38. United Nations Global Compact, (2017), The Power of Principles, available at:

    http://www.unglobalcompact.org/aboutthegc/thetenprinciples/principle10.html.
39. Warner, C. M. (2015). Sources of corruption in the European Union. In P. M. Heywood (Ed.), *Routledge handbook of political corruption*. London: Routledge.