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REPORT ASSESSMENT OF ORDINARY ANTICORRUPTION INITIATIVES OF MOLDOVAN PUBLIC AUTHORITIES:

Implementation of 10 policies in 2020

2021

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This version of the report is a translation of the original, which was written in Romanian. Every effort has been made to ensure that the translation is a faithful reflection of the original. However, in all matters relating to the interpretation of specific terms, information, the original language version of the report shall prevail over this translation.

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ABBREVIATIONS

NIA	National Integrity Authority
NAC	National Anticorruption Center
AIA	Anticorruption Initiative Assessment
MoD	Ministry of Defence
MARDE	Ministry of Agriculture, Regional Development and Environment
MIA	Ministry of Internal Affairs
MFAEI	Ministry of Foreign Affairs and European Integration
MEI	Ministry of Economy and Infrastructure
MECR	Ministry of Education, Culture and Research
MoF	Ministry of Finance
MoJ	Ministry of Justice
MHLSP	Ministry of Health, Labour and Social Protection
NIAS AP	NIAS Implementation Action Plan
NIAS	National Integrity and Anticorruption Strategy

I. GENERAL CONTEXT

This report describes the outcomes of an innovative exercise of assessing anticorruption initiatives (hereinafter – AIA) of the public entities of the Republic of Moldova, borrowed from the experience of the Republic of Korea¹. The exercise involved assessing how the public institutions implemented 10 anticorruption policies out of the 14 policies established by NIAS AP, Law 82/2017 in 2020.

The assessment was carried out based on the **Methodology for assessing anticorruption initiatives in the Republic of Moldova**², developed under the **UNDP Moldova Project ‘Curbing corruption by building sustainable integrity’**.

It should be stressed that AIA:

- is a **voluntary** exercise involving public entities;
- does not duplicate/overlap with the assessment of institutional integrity, corruption risks, monitoring and evaluation of the implementation of integrity and anticorruption plans;
- establishes a parallel mechanism for assessing pro-active activities and actions of public entities, related to anticorruption and integrity, according to the Action Plan for the implementation of Pillar II of NIAS.

The purpose of AIA is to encourage public entities and their managers to make voluntary and proactive efforts in order to create a climate of institutional integrity, as well as to provide a constant mechanism for monitoring and guiding public entities by NAC in implementing effective and practical measures to prevent corruption and develop anticorruption and integrity policy documents.

The objectives of AIA are as follows:

- facilitate the implementation of anticorruption policies;
- strengthen the capacities of the assessed entities and encourage them to undertake voluntary and proactive actions to prevent corruption by assessing their initiatives;
- ensure the organisation and coordination of the public entities’ activities in timely and qualitative provision of information materials (reports, studies, analytical and explanatory notes) on the implementation of anticorruption measures;
- develop and implement a system for monitoring the implementation of anticorruption initiatives by public entities and assess their impact;
- regularly monitor the implementation of initiatives through performance indicators, followed by an assessment of effectiveness of the measures implemented;
- identify and predict key areas to increase the effectiveness of anticorruption activities, anticipate the emergence of risk factors and risks of corruption and form anticorruption public opinion;
- increase the level of accountability of public entities (subjects of the assessment) and the effectiveness of integrity policies by institutionalising a regular assessment;

¹https://www.undp.org/content/seoul_policy_center/en/home/library/korea-s-anti-corruption-initiative-assessment--frequently-asked-.html This tool has been applied in the Republic of Korea since 2002 and has been adopted by other states over time. The authors of this tool assert that it facilitates the concrete implementation of the national anticorruption policy framework, encourages and strengthens public entities’ capacities to undertake voluntary and proactive actions in order to prevent corruption and ensure a climate of institutional integrity.

² This document represents an adaptation and adjustment of the Korean Methodology to the regulatory and institutional framework of the Republic of Moldova.

- provide public entities with consultations and information related to corruption and prevention measures;
- distribute the best practices among the subjects of the assessment.

The first AIA exercise, piloted in 2020, assessed the implementation of anticorruption sectoral plans in 2019, approved for 9 strategic areas, and tested the applicability of the AIA methodology. A key finding of testing the Assessment Methodology in 2020 was that such exercise, in order to be objective, should be calibrated by the entities of the same category and by the comparable actions: a similar number of actions, the same indicators, a similar period, etc. Based on this finding, it was deemed appropriate to apply the present assessment (AIA 2020) for 9 ministries (authorities with the same status), to implement a part (10) out of the 14 anticorruption policies provided for by Pillar II of NIAS.

Additionally, this report was developed in line with the guidelines set out in the Methodology mentioned above and followed the structure recommended by this Methodology:

- describes **the subject of the assessment**: the degree of implementation of the 10 anticorruption policies established by Pillar II of NIAS;
- analyzes the self-assessment reports of public entities (**AIA subjects**);
- systematises and determines **the scoring for the degree of implementation** of the anticorruption policies in 2020;
- determines the **ranking of the subjects of the assessment** according to the score obtained;
- based on the assessment, devises a series of **conclusions and recommendations**.

II. EVALUATION METHODOLOGY

The National Integrity and Anticorruption Strategy (hereinafter – NIAS) was built on seven pillars focused on the sectors/areas vulnerable to corruption, as well on the institutions intended to contribute to combating and preventing corruption and ensuring a climate of integrity within the authorities. Each pillar described sector/institution specific issues, set the objectives, impact indicators and priorities for each pillar.

The ***Pillar II of NIAS ‘the Local Public Administration, the Government and the Public Sector’*** included several priorities, from the perspective of this assessment (2020), Priority **II.1 – Promoting integrity within public entities** is important. The outcomes envisaged by NIAS for this priority are the following:

- A climate of institutional integrity created within public entities;
- Sanctioning integrity requirements violation, committed by public agents, including by members of the Government and local elected officials.

In this context, it should be recalled which measures established by the **Framework Law on Integrity, No 82/2017** ensure **a climate of integrity**. Thus, Article 10 of Law No 82/2017 expressly provides:

A climate of institutional integrity is cultivated by implementing the following measures:

- a) hiring and promoting public agents on the basis of merit and professional integrity;*
- b) compliance with the legal regime of incompatibilities, hierarchy restrictions and advertising restrictions;*
- c) compliance with the legal regime for declaring property and personal interests;*
- d) compliance with the legal regime of conflict of interest;*
- e) prohibition of favoritism;*
- f) compliance with the legal regime of gifts;*
- g) prohibition, denunciation and response to undue influences;*
- h) prohibition of any corruption elements and protection of whistleblowers;*
- i) intolerance of integrity breaches;*
- j) ensuring transparency in the decision-making process;*
- k) ensuring access to information of public interest;*
- l) transparent and responsible management of public assets, reimbursable and non-reimbursable finances;*
- m) compliance with the norms of ethics and deontology;*
- n) compliance with the regime of prohibitions and restrictions related with the termination of the mandate, employment or working relations and the transition of public agents to the private sector (revolving doors).*

All those 14 anticorruption measures/policies mentioned above were included for Priority II.1 of the Action Plan for the NIAS implementation.

Respectively, when developing the Methodology for the assessment of anticorruption initiatives and assessment guidelines, the above-mentioned measures were developed as **ordinary initiatives**, i.e those measures provided by legislation and national policy documents that are to be implemented on a daily basis, usually, by the assessment subjects (public entities).

However, during the development of the guidelines for assessing the implementation of the **ordinary initiatives** it was agreed that **only quantifiable, comparable and objective**

indicators will be used that can prove the observance of conditions on the integrity policies regulated by the Integrity Law No 82/2017.

Thus, in order to ensure the competitive character and process objectivity, the following 4 actions established for Pillar II (priority II.1) were excluded from the 2020 assessment exercise:

- Ensuring compliance with the regime of incompatibilities, hierarchy and advertising restrictions (*action II.1.2*),
- Ensuring compliance with the regime of declaration of property and personal interests (*action II.1.3*),
- Ensuring intolerance of integrity breaches (*action II.1.8*) and
- Ensuring compliance with the regime of restrictions related to the termination of the mandate, employment or working relations and the transition of public agents to the private sector (revolving doors) (*action II.1.13*)³

The exclusion of the *above*-mentioned actions from the assessment exercise was justified by the fact that NIAS AP lacked some quantifiable indicators that could be applied in comparative aspect for the assessment subjects – indicators that would prove the authority performance or its absence. Moreover, the implementation of some of these actions is interconnected and is related to the simultaneous and subsidiary competence of several authorities, especially referring to NIA (policies on the statements of wealth and interests, regime of restrictions and limitations) and NAC (policy of intolerance towards integrity breaches).

Ordinary initiatives assessment score – 10 anticorruption policies are scored on the basis of assessment grid from **Annex 1** of this Report, following the approach provided on p. 33 of AIA Methodology. Thus, the assessment of the implementation of ordinary initiatives was conducted on the basis of two criteria:

1. **Institutional infrastructure** in the corruption field, checking the following indicators: *appointed person responsible, existence of anticorruption action plan and reports on the progress achieved*;
2. **Measures for strengthening the institutional integrity**, *i.e.* those 10 actions established for priority II.1 of Pillar II of the Action Plan, to implement NIAS and detailed in the next section of this Report, and checking the established indicators in NIAS AP (for details see respective section of the assessment grid of **Annex 1** of this Report).

Indicators used to assess compliance and compliance with those 2 criteria are quantifiable indicators that, broadly, correspond to NIAS AP indicators. The assessment grid from Annex 1 stipulates that to meet both assessment criteria, the entities may obtain a **maximum score of 61 points**, of which:

- **9 points** for **criterion I** (institutional infrastructure) and
- **52 points** for **criterion II** (measures for strengthening the institutional integrity)

Achievement of the indicators was checked by applying the following tools:

- analysis of self-assessment reports of the 9 ministries (assessment subjects);
- cross-check of the self-assessment reports data of the assessment subjects by accessing the websites, verification sources indicated by the entities assessed etc.;

- analysis of the alternative reports developed by the civil society;
- analysis of other related sources (NAC, NIA, Court of Accounts reports, investigation portals etc.).

Generalisation of data collected during the preliminary stage of the assessment shows that some of the assessed policies, formally, would have been fully implemented by the assessment subjects. At the same time, it was noticed that certain information on the implementation of anticorruption actions lacks, and some is not complete. Respectively, in order to ensure a greater precision of the assessment process and an exact establishment of the degree of anticorruption policy implementation, at the end of July 2021, the assessment subjects were invited to complete an additional questionnaire which contained a series of control questions. The questionnaire is included in **Annex 11** of this Assessment Report.

We emphasise that this additional questionnaire referred to 5 anticorruption policies:

- Compliance with the legal regime of conflicts of interest and avoidance of favoritism;
- Compliance with the legal regime of gifts;
- Prohibition, denunciation and response to undue influences;
- Prohibition of any corruption elements and protection of whistleblowers;
- Ensuring decision-making transparency

The synthesis of the data provided by authorities at the complementary assessment stage offers a clearer image of the degree of implementation of the policies and practices applied at the subject level. We note that this additional information enabled a clearer differentiation of the AIA subjects, including awarding additional score, to encourage authorities that effectively applied the 5 policies mentioned above and the score lowering for those that did not achieve the indicators established in NIAS AP.

III. AIA OBJECTIVE: 10 ANTICORRUPTION POLICIES

This assessment **covers** the implementation of 10 anticorruption policies out of the 14 policies established by NIAS AP, Law 82/2017 and namely:

1. hiring and promoting public agents on the basis of merit and professional integrity;
2. compliance with the legal regime of conflicts of interest and prohibition of favoritism;
3. compliance with the legal regime of gifts;
4. prohibition, denunciation and response to undue influences;
5. prohibition of any corruption elements and protection of whistleblowers;
6. ensuring decision-making transparency;
7. ensuring access to information of public interest;
8. transparent and responsible management of public assets, reimbursable and non-reimbursable finances;
9. compliance with the norms of ethics and deontology;
10. ensuring the implementation of corruption risk management

The respective chapter provides a description of each policy to be assessed, as well as the score obtained by each entity to be assessed for each implemented policy, according to the assessment grids per each ministry in **Annexes 2-10** to this Report.

III.1. Hiring and promoting on the basis of merit and professional integrity

Article 11 of Law 82/2017 provides that: 'Recruitment and promotion of agents in a public entity shall be carried out through public contest, on the basis of transparent criteria and selection objectives based on merit, professional qualification, capacity, competence and professional integrity, without favouring private interests and without any other form of discrimination [...] with the compulsory setting of selection criteria based on merit and professional integrity (request of criminal record certificate regarding the professional integrity, the information regarding the unresolved incompatibility states, sanctioned conflicts of interests and the criminal record that includes information about the deprivation of right to hold public office)...

#	Ministry	Score
1.	MoD	1
2.	MARDE	1
3.	MIA	1
4.	MFAEI	4
5.	MEI	1
6.	MECR	2
7.	MF	1
8.	MoJ	4
9.	MHLSP	4
Average		2.1

In order to check the implementation of this policy by ministries, the following criteria of NIAS AP were used: *number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment; number of public agents employed/reconfirmed in positions after the verification according to Law No 271/2008 on the Verification of Holders of and Candidates for Public Offices. The score for indicators is set out in the assessment grid in Annex 1 and for each entity in Annexes 2-10. **The maximum number of points that can be obtained for this policy is – 4.***

Assessment of the extent to which the **policy on employment based on merit and professional integrity** was implemented proves that the requirements established by Law 82/2017 and, respectively, Law 271/2008 are not fully implemented by public authorities:

- only two of the AIA subjects (MoJ and MFAEI) complied with the requirements: integrity records were requested from NAC upon employment, and verification by SIS was requested when necessary;

- there are frequent situations when the number of requested integrity records, reported to the number of new employees, is not commensurable, the obligation to request integrity records and integrity certificates being ignored by the assessment subjects. A similar finding is mentioned in Transparency International (TI) Moldova Report 'Monitoring anticorruption policies in the central public authorities'⁴ (p.40) according to which *'[...] the quantitative data does not really mean qualitative perspectives on the promotion and contest processes (legality, transparency, integrity etc.). Moreover, comparing the data provided by the monitored entities with those provided by other relevant authorities, it seems that contests are organised and conducted by violating sometimes certain procedures. Thus, according to the Report on the activities of the National Integrity Authority for 2019, only 3 entities of those monitored requested integrity certificates, and namely: MoF – 7 certificates issued; MHLSP – 3 certificates issued; MARDE – 2 certificates issued'*.

III.2. Compliance with the legal regime of conflicts of interests and prohibition of favoritism

Article 14 of Law 82/2017 stipulates that: *in order to ensure that public interest is served with impartiality and objectivity, public agents, along with the manager of public entity and, if necessary, with the National Integrity Authority, shall identify and address conflicts of interests appearing in their professional activity within the terms and manner provided by Law No 133/2016 on the Declaration of Property and Personal Interests.*

The following indicators were taken into consideration when assessing the degree of implementation of this policy: *existence of CI register and appointment of the person responsible for keeping this register.* At the additional assessment stage, ***existence of policy implementation practices*** was also taken into account.

The score for indicators is set out in the assessment grid in Annex 1 and for each entity in Annexes 2-10.

The maximum score that can be obtained for this policy is – 5.

#	Ministry	Score
1.	MoD	5
2.	MARDE	5
3.	MIA	4
4.	MFAEI	4
5.	MEI	4
6.	MECR	5
7.	MF	4
8.	MoJ	4
9.	MHLSP	5
Average		4.4

According to the self-assessment reports' data and from the perspective of the indicators applied for the assessment, we find that all the authorities created the internal framework required for this policy implementation: people responsible for keeping the registers of conflicts of interest were appointed, the keeping records of declared conflicts of interest is ensured. A similar finding is found in the TI Report (p. 47) mentioned above: *'people responsible of keeping records of declarations of conflicts of interest were appointed in all monitored entities. [...]*.

As mentioned above, to effectively implement a series of policies, including the conflict of interest regime policy, it was considered necessary to award an additional score, to encourage authorities that registered and solved conflict of interest in practice. Thus, the analysis of data provided additionally in July 2021 shows that only 4 of the assessment subjects registered and solved conflicts of interest in 2020: MoD, MARDE, MECR and MHLSP, the respective authorities benefited from an additional score.

The answers of the authorities that did not register conflicts of interest reveal that:

⁴ The Report was launched in 2020 and included the data on monitoring public anticorruption policies during 2018-2019, focused on implementing the policies stipulated in the UN Convention against Corruption (UNCAC) in central public authorities (PA): ensuring decision-making transparency; declaring property and personal interests; ethics and meritocracy; eliminating conflicts of interest; ensuring a functional complaint system, ensuring access to information through websites.

- some authorities ignored the NAC request to answer the additional questionnaire (MoJ), respectively, their scores were lowered,
- other authorities are not aware of the institution's essence and confuse it with the whistleblowers' institution (MFAEI),
- other institutions (MIA, MEI, MoF) consider that there would be no conflicts of interest neither at the ministry, nor in the subordinate institutions. The respective statement seems to be at least unfounded, when some of authorities invoke the existence of some finding acts of NIA on conflicts of interest in the institution (MIA). In such situations, score of the assessment subjects was lowered.

III.3. Compliance with the legal regime of gifts

Article 16 of Law No 82/2017 stipulates: *To avoid corruption in the activity of public authorities, their managers and public agents are forbidden to request or accept gifts (goods, services, favours, invitations or any other advantage) that are given to them personally or to their families, if their offering or providing is directly or indirectly related to their professional activity's carrying out (inadmissible gifts). Requesting or accepting inadmissible gifts is an act of corruption according to the criminal legislation and provisions of Chapter VI of this law.*

The policy implementation was assessed on the basis of the following indicators: *gift record registers published on websites; people appointed to keep the registers; commissions established to keep record of gifts.*

At the additional assessment stage, ***existence of policy implementation practices*** was also taken into account.

The maximum score that can be obtained for this policy is – 7.

#	Ministry	Score
1.	MoD	7
2.	MARDE	6
3.	MIA	6
4.	MFAEI	6
5.	MEI	4
6.	MECR	3
7.	MF	6
8.	MoJ	4
9.	MHLSP	6
Average		5.2

Analysis of self-assessment reports shows that most ministries complied with the requirements stated in Law 82/2017 and [GD 116/2020 on the legal regime of gifts](#): gift registers were developed, people to keep these registers were appointed and gift assessment commissions were created. However, analysis of AIA subjects' websites proves that not all authorities comply with the requirement to publish the gift registers on their websites, which resulted in lower scores for three ministries: MEI, MECR and MoJ. At the same time, in the light of new editorial office of [GD 116/2020](#) on the regime of gifts, the authorities were to ensure the adjustment of the registers, inclusively to ensure the publication of 2 categories of registers: regarding the admissible gifts and, respectively, inadmissible gifts. Entities involved in the assessment exercise did not make these adjustments, except for the MoD only.

The answers to the additional questionnaire for authorities show that new provisions of [GD 116/2020](#) are not fully used and understood by the institutions' employees and even the assessment commissions: in the admissible gifts registers, there are still gifts that are not to be declared. For example, the objects that are still exempt from being declared are: *2) office and stationery supplies (data storage facilities, canvas bags, diaries, notepads, books and notebooks in various forms, folders, pencils, pens, markers and other similar goods) received by the public agents during their participation in training seminars, conferences, round tables and other similar events [...].*

Some assessment subjects (MFAEI) mentioned the necessity of some trainings on the regime of gifts in the light of new regulations established by GD 116/2020.

At the same time, referring to this policy, a problematic aspect of the regulatory framework must be highlighted, which was designed on the practical side as well: the form of the gift register, annex of [GD 116/2020](#) does not include the gift description – an aspect that should be amended.

III.4. Prohibition, denunciation and response to undue influences

Article 17 of Law No 82/2017 provides: *In order to ensure that public interest is served with impartiality and objectivity, the public agent's professional activity should be carried out without any undue influences. The mechanism of denunciation and response to undue influences is regulated by the Government.*

#	Ministry	Score
1.	MoD	2
2.	MARDE	2
3.	MIA	3
4.	MFAEI	0
5.	MEI	2
6.	MECR	2
7.	MF	2
8.	MoJ	1
9.	MHLSP	2
Average		1.6

To establish the extent to which this measure was implemented, the following indicators were applied: *number of cases of denounced undue influence, solved in public entities; existence of the register of undue influences.*

At the additional assessment stage, ***existence of policy implementation practices*** was also taken into account.

The maximum score that can be obtained for this policy is - 3.

Assessment of this policy implementation shows that almost all assessed authorities comply with the legal provisions: they established the registers of undue influences and appointed people responsible of keeping them.

The additional assessment questionnaire requested authorities to provide information about registered cases of undue influence and response actions.

Only one authority (MIA) invoked the existence of some practices of registering and responding to undue influences.

According to the answers of most subjects, such a phenomenon would not exist in the institutions. MFAEI (in contrast to the previous report) mentioned that *'no procedure is established in the institution, no decision regarding the appointment of the person responsible of registering denunciations is issued'*.

III.5. Prohibition of any corruption elements and protection of whistleblowers

According to the **Article 18 of Law 82/2017**: *for a good functioning of a public entity in compliance with its legal mandate to serve public interest and ensure non-violation of human rights, of public entity's image and reputation, its manager and public agents shall prohibit and immediately denounce any attempts to involve them in corruption. Public agents who know about corruption cases, illegal and unethical practices that threaten the public interest and occur in public entities they are part of and/or in the private entities they are in service relationships, but in which are not involved directly, are entitled to submit a notification to the public entity's manager or, where appropriate, to the responsible anticorruption authority, to other competent public authorities.*

The respective policy assessment was conducted by following the indicators: *number of corruption cases denounced by public agents to public entities and anticorruption agencies; number of whistleblowing complaints submitted within the public entities; number of whistleblowing complaints sent to NAC; number of whistleblowers under protection; existence of the register of whistleblowing complaints and appointment of a person responsible for its keeping.*

At the additional assessment stage, ***existence of policy implementation practices*** was also taken into account.

The maximum score that can be obtained for this policy is – 5.

#	Ministry	Score
1.	MoD	4
2.	MARDE	4
3.	MIA	4
4.	MFAEI	0
5.	MEI	2
6.	MECR	0
7.	MF	2
8.	MoJ	0
9.	MHLSP	2
Average		3

Although in the 2020 self-assessment reports on implementing the actions of Pillar II of NIAS AP, most subjects stated that they have developed and maintain the registers of whistleblowing complaints, appointed people responsible for keeping these registers, however, the repeated questioning in the summer of 2021 proves a contradictory situation. Only a part of subjects adjusted and created the infrastructure to register and investigate the whistleblowing complaints and namely: MoD, MARDE, MIA and, partially MoF and MEI (MoF and MEI internal regulations are not adjusted to the Law 122/2018). Other authorities (MFAEI, MECR, MoJ) did not create the internal regulatory and institutional framework for whistleblowers.

The 2021 questionnaire also included questions about the causes of absence of whistleblowing complaints. The synthesis of the answers shows the following:

- ***MARDE:*** *the institution's employees do not know/understand what a whistleblowing complaint is; the institution's employees are afraid;*
- ***MIA:*** *the whistleblower's institution is negatively regarded by the staff;*
- ***MHLSP, MECR, MoF, MEI:*** *there are no illicit practices.*

These answers reveal that the whistleblowers' institution was not popularised and sufficiently explained, most employees do not perceive this situation as a real mechanism of reacting to the illegal practices of the institution, and the created mechanisms (when created) are not safe enough or do not provide safety to potential whistleblowers. Respectively, scores for this policy implementation were awarded based on the answers given by authorities.

III.6. Ensuring transparency in decision-making

According to Article 20 of the Law No 82/2017: *Transparent and responsible activity of public entities in relation to citizens and with their engagement is ensured by creating possibilities for participation of citizens, associations established in compliance with the law and of other stakeholders (hereinafter – stakeholders) in the decision-making process at the level of public entity. Rules on the procedures ensuring decision-making transparency at the level of public entities and derogations from these rules are stipulated in the Parliament's Rules of Procedure, Law No 239/2008 on Decision-Making Transparency and in the Government's regulatory acts*

#	Ministry	Score
1.	MoD	4
2.	MARDE	2
3.	MIA	5

The indicators used to assess this policy were: *annual reports on decision-making transparency published on the websites of public entities; establishing certain qualitative and quantitative indicators on transparency in decision-*

4.	MFAEI	5
5.	MEI	5
6.	MECR	5
7.	MF	5
8.	MoJ	5
9.	MHLSP	3
Average		4.5

making; annual report of the State Chancellery on decision-making transparency within CPA and LPA; appointing the responsible person; publishing the reports and their quality

The maximum score that can be obtained for this policy is – 6.

The analysis of data on achievement of policy on transparency in decision-making show that no authority managed to obtain the maximum score of 6 points. Score of the assessment subjects was lowered due to the lack of qualitative indicators in the annual reports on transparency in decision-making. Even if ministries follow the structure recommended by the State Chancellery, we note that the reports are formal, contain only quantitative data and no thorough analysis. At the same time, the annual reports on decision-making transparency were not identified on websites of two ministries (MARDE and MHLSP)⁵ as a result, they obtained a lower score compared with other assessed authorities.

The alternative report of TI Moldova (page 25), which analysed the transparency in decision-making, states: *‘All the entities, [...], placed the draft decisions on the websites. As regards the related materials, information notes are available in most of the cases. The situation is different when we speak about adopted decisions. Basically, all the monitored entities, except MEI, do not pursue the goal of decision-making. Unavailability of public consultations’ results is also a problem. Not a single entity is irreproachable in this regard. Of 12 monitored entities, 6 entities (MoJ, MoF, MEI, MIA, MECR, MHLSP) placed the reports on decision-making process for 2018 on the websites. No authority made available the 2019 reports within the period specified by Item 42 of the Regulation on public consultation with the civil society in decision-making, approved by Item 1 of the Government Decision No 967/2016 – end of January of the year immediately following the reference year’.*

III.7. Ensuring access to information of public interest

According to **Article 21 of the Law No 82/2017**: *to increase the efficiency of population information and of citizens’ control over public entity activities and to stimulate the opinion-forming and active participation of the population in the decision-making, access to information of public interest on public entity activity shall be guaranteed. For this purpose, the manager of the public entity and public agents shall ensure the free access to official information, including active, correct and timely information of citizens about matters of public interest and about issues of personal interest to them*

To assess the policy, the following indicator was used:
People responsible for access to information of public interest, appointed within authorities.

The maximum score that can be obtained for this policy is – 2.

#	Ministry	Score
1.	MoD	2
2.	MARDE	2
3.	MIA	2
4.	MFAEI	2
5.	MEI	2
6.	MECR	2
7.	MF	2
8.	MoJ	2
9.	MHLSP	2
Average		2

⁵ The websites were accessed/verified in May, 2021.

From the perspective of the indicators set for the verification of that policy, we note that the authorities appointed people in charge of ensuring the access to information of public interest. Nonetheless, the analysis of other indicators conducted by TI Moldova reveals various deficiencies regarding the access to information of public interest, namely: [...] *there are a series of issues in policy implementation, including those related to legal framework, the mechanism of maintaining websites and their content [...] certain important obligatory information is not complete or lacks (activity reports, programs and projects, including of technical assistance; data on budget execution; information/reports on public procurement results and membership of procurement working groups; results of audits/controls, reports on the implementation of the NIAS Action Plan and, where appropriate, on the implementation of anticorruption sectoral plans).*

III.8. Transparent and responsible management of public assets

According to Article 22 of Law No 82/2017: *To ensure sound, efficient and sustainable use of public resources obtained from society's work through the contribution of taxpayers, as well as of the means from external funds, the manager of public entity and public agents shall ensure the management of budgetary and extra-budgetary appropriations, shall manage public assets on the basis of good governance principles, shall guarantee the transparency of public procurements, the implementation of internal managerial control system and the organisation of internal audit in the public sector.*

#	Ministry	Score
1.	MoD	8
2.	MARDE	7
3.	MIA	8
4.	MFAEI	6
5.	MEI	8
6.	MECR	4
7.	MF	8
8.	MoJ	4
9.	MHLSP	6
Average		6.5

The assessment grid provides the following indicators for this policy: *information about the management of public entity assets, published; information on attracting and managing external assistance, published; Reports of public entities that attracted external funds on the results (performance) obtained following this assistance; internal audit files, strategic plans and annual audit activity plans, approved by public entities; statements about good governance, published on the websites of public entities; consolidated annual report on the public internal financial control, submitted to the Government; annual and quarterly public procurement plans of public entities, published on their official websites*

The maximum score that can be obtained for this policy is – 10.

Data in the table below show that the implementation of this policy is deficient and only four of the assessed authorities achieved partially the established indicators (MoD, MIA, MEI, MoF).

It should be noted that most of the institutions did not develop and do not provide exhaustive information about **the attraction and management of external assistance**. Usually the information is limited to the list of existing assistance projects and objectives of these projects, but does not provide clear details about the way the assistance is managed.

All the subjects reported that they developed internal audit charters and annual audit activity plans. As regards the **public procurement plans**, the authorities do not publish them every time or it is difficult to identify them in the website.

Information on the management of public assets is still a concern, reports of most authorities state that the information is sent to the Public Property Agency. Nonetheless, the information found on governmental portals is not up-to-date.

III.9. Compliance with the norms of ethics and deontology

According to **Article 23 of the Law No 82/2017**, to establish a mutual climate of trust and respect between the citizens and a public entity, aiming at creating and maintaining the prestige, improving the performance, removing bureaucracy and corruption at the level of public entity, managers and public agents shall promote ethic and deontology norms at the level of public entity and shall inform the public about ethical and professional conduct to which citizens are entitled from the manager and public agents in their professional activity

The following indicators were used for this policy: *adopted ethics and deontology codes for public entities that do not have such codes; approved annual training plans, including ongoing training; number of trainings and public agents trained in ethics and deontology.*

The maximum score that can be obtained for this policy is – 6.

#	Ministry	Score
1.	MoD	4
2.	MARDE	4
3.	MIA	6
4.	MFAEI	2
5.	MEI	6
6.	MECR	2
7.	MF	6
8.	MoJ	6
9.	MHLSP	4
Average		4.4

Apparently, all the authorities have a pre-set regulatory framework on ethics rules: most of them invoke the provisions of the [Code of Conduct of Civil Servant](#), adopted by Law No 25/2008, while four authorities report the approval of certain ethical regulations tailored to the specificity of their authority (MIA, MFAEI, MEI MoF) – this approach is suggested by Law No 82/2017 and NIAS.

The assessment revealed the problems of **lack of training plans** and of trainings in professional ethics and deontology, which resulted in lowering institutions' score.

III.10. Implementing the corruption risk management

According to **Article 27 of the Law No 82/2017** corruption risk management is an internal process conducted by a public entity to identify, assesses and manage corruption risks related to professional activity.

#	Ministry	Score
1.	MoD	2
2.	MARDE	2
3.	MIA	2
4.	MFAEI	2
5.	MEI	1
6.	MECR	2
7.	MF	3
8.	MoJ	2
9.	MHLSP	2
Average		2.1

To assess the implementation of this policy the following indicators were applied: *risk registers, that include corruption risks too, developed by public entities; risk register include corruption risks by type of integrity incidents at the level of public entities; report on measures implemented to mitigate risks, developed annually*

The maximum score that can be obtained for this policy is – 4.

The verification of the implementation of this policy shows that no authority managed to ensure the full implementation of that policy and to obtain the maximum score set for this policy. The most inconsistent were the actions related to the development of annual reports

on the corruption risks implementation due to the lack of corruption risk registers and their periodic adjustment depending on the regulatory evolutions, changes of competences and other circumstances.

In **conclusion of this chapter** it is important to emphasise the following aspects:

- **one single policy** – Apparently, all the subjects of the assessment *ensured access to information of public interest*, from the perspective of indicators used for this assessment. Nonetheless, the alternative reports produced by the of civil society (in this regard, see the [TI Moldova Report](#)), based on the assumption of applying that certain indicators for a more detailed verification, state that this policy is not implemented fully and efficiently, particularly regarding publication and accessibility of information of public interest on the websites of the assessed institutions;
- **other four assessed policies** registered an **average score**. These are the policies on *the regime of conflicts of interest, gift regime, transparency in decision-making and requirements for professional ethics*. The assessed subjects did not apply fully and did not comply with their duties to register and solve conflicts of interest; failed to adjust the internal procedures regarding gift regime, to publish timely reports on transparency in the decision-making, and when published, reports mainly had a quantitative character; no training plans were developed and no training courses were delivered in the field of professional ethics and deontology;
- **five policies** (*employment on the basis of merit, denunciation and response to undue influences, whistleblowers, efficient management of public assets and corruption risk management*) registered the lowest level of achievement. Another problem is the lack of any requests for integrity records, although this is requested by law, as well as lack of any request for SIS verification, when such a verification is necessary. At the same time, the assessed subjects did not create/adjust the infrastructure to apply policies on undue influence and whistleblowers: responsible persons were not appointed, the registers requested by law were not developed. Moreover, the employees of the institutions do not know about the existence of these mechanisms or are reluctant to use them because they do not trust their safety. At the same time, actions related to the management of the public assets and risk management are reported and implemented in a tokenistic manner. In this context note that certain authorities, during the additional assessment stage, invoked the need to organise training courses, taking into account the amendments to the regulatory framework on integrity.

IV. SUBJECTS OF THE ASSESSMENT: 9 MINISTRIES

This chapter describes the results of the assessment at the level of the 9 ministries – specialised central public administration authorities, as follows (in alphabetic order):

- Ministry of Defence;
- Ministry of Agriculture, Regional Development and Environment;
- Ministry of Internal Affairs;
- Ministry of Foreign Affairs and European Integration;
- Ministry of Economy and Infrastructure;
- Ministry of Education, Culture and Research;
- Ministry of Finance;
- Ministry of Justice;
- Ministry of Health, Labour and Social Protection.

According to AIA Methodology, an assessment table was created for each of those 9 ministries. It ensured the assessment of ministries from the perspective of two criteria:

- **Criterion I:** anticorruption institutional infrastructure;
- **Criterion II:** ordinary measures for strengthening the institutional integrity (10 anticorruption policies).

The assessment tables per each ministry are presented in Annexes 2-10 of this Report. We reiterate that the assessment took into account the indicators set in the Methodology and the Assessment Guidelines.

As regards the **Criterion I - Institutional Infrastructure**, three indicators were taken into account:

- appointment of the person responsible of anticorruption policies;
- existence of anticorruption action plan: developed, approved and published;
- development and publishing of progress reports.

For the first two indicators it was set *ex officio* that all assessed authorities appointed people responsible, and the applicable anticorruption plan is NIAS AP for Pillar II, action plan opposable to all the ministries. Thus, all the subjects obtained the maximum score provided for by the assessment grid.

Ministry	Indicator	Maximum possible score	Awarded score
MoD	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	3
MARDE	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	2
MIA	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	3
MFAEI	Responsible person appointed	3	3
	Anticorruption action plan	3	3

	Progress reports	3	3
MEI	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	3
MECR	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	2
MoF	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	3
MoJ	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	2
MHLSP	Responsible person appointed	3	3
	Anticorruption action plan	3	3
	Progress reports	3	2

The aforementioned Indicator 3 – ‘progress reports’ – differentiated subjects of the assessment, given that 4 ministries obtained a small score. Thus, even if they developed progress reports on anticorruption actions and submitted them to NAC, these reports⁶ are not published on the websites of the following authorities: MARDE, MECR, MoJ and MHLSP.

As regards *Criterion II*, which referred to implementation of 10 anticorruption policies by the assessment subjects, the results are described in Chapter III above, and detailed in the assessment tables in *Annexes 2-10*. Below are synthesised and presented certain peculiarities in implementing anticorruption policies by each ministry separately.

MoD

- non-compliance with employee recruitment policy: integrity records and SIS verification are no requested anymore;
- even if training courses are conducted, training plans are not approved, although they are required by NIAS AP;
- no annual reports on the implementation of risk mitigation measures are developed.

MARDE

- the report on NIAS implementation is not published on the ministry’s website;
- according to the self-assessment report, neither integrity records nor SIS verification of candidates and holders of public and public dignity positions are requested;
- even if MARDE self-assessment report has a reference to the published gift register and the annual report on the decision-making transparency, ordinary users of the website do not have access to plans, reports, registers, not even via the site’s search engine;
- the ministry has not developed a employee training plan, including in the field of ethics and deontology;
- the action aiming at ‘ensuring transparent and responsible management of public assets and of foreign assistance’ is not implemented fully: there is no report on assets management and abstract references (related to external assistance management) to assistance projects are made, without a detailed and comprehensive analysis.

MIA

⁶ At the stage of drawing up this report (May 2021)

- the analysis of the data provided by MIA reveals non compliance with employee recruitment rules: integrity records and SIS verification are not required anymore, which is necessary to cultivate and maintain institutional integrity;
- the reluctance of employees to disclose the illicit practices (according to the answers in the additional questionnaire), reveals that the institution does not understand the whistleblowers and the possible insecurity of reporting channels;
- the reports on decision-making transparency contain only quantitative indicators.

MFAEI

- there is no information about attracting and managing external assistance;
- the employees training plan was not approved and training courses for employees were not conducted;
- the additional assessment stage emphasised the lack of understanding of anticorruption policies and certain regrettable confusions (conflicts of interest, inappropriate influences, whistle blowers), as well as the lack of any progresses in implementing them;
- no annual reports on the implementation of risk mitigation measures are developed.

MEI

- the employment policy is not implemented fully, particularly in terms of requesting integrity records and verifying the candidates for/holders of public positions and public dignity positions;
- management of corruption risks is not updated and annual risk management reports are either not developed or not available to the public;
- gift registers are not made available to the public;
- the reports on the management of public assets and of external assistance are not published.

MECR

- the self-assessment report presented by MECR is short and does not contain all sections of the assessment and requested indicators;
- not a single Report on the conduct of actions from Pillar II, Priority II.1 of NIAS was published on MECR website;
- no conclusive data about the observance of the declaration of gifts regime are provided, the Register is not published on the website;
- the aspects of attracting and managing the external assistance are not reflected in the report; as regards the management of public assets, there is an abstract reference to the reports of the Court of Accounts – which reveals the superficial implementation of anticorruption actions at the level of ministry and subordinated institutions;
- MECR employees do not have a training plan and apparently, did not benefit from training in professional ethics;
- there are no annual reports on the management of risks at the level of ministry.

MoF

- the report is developed in compliance with the indicators set in the NIAS AP;

- deficiencies were identified in terms of requesting integrity records and verifying the candidates/holders of public and public dignity positions;
- the reports on decision-making transparency contain only quantitative indicators;
- the reports on the management of public assets and of external assistance are not published.

MoJ

- the reports on NIAS implementation are not published on the ministry's website;
- the action on ensuring decision-making transparency was not reported (II.1.9);
- the reports and plans for the management of public assets and of external assistance are not published on the MoJ website;
- even if there is a reference to the gift register on the website, there isn't any functional link to this report;
- MoJ was the single authority that did not participate in the additional assessment stage: at repeated calls of NAC, it did not present the requested information, which resulted into smaller score for several categories.

MHLSP

- during the report development period, the ministry's website lacked the report on the observance of decision-making transparency;
- no reports about attracting and managing external assistance were identified on the ministry's website;
- there is no information about reports on the implementation of risk mitigation measures.

The **conclusion of this chapter** contains the following key findings:

- most ministries report that they have created the institutional infrastructure for a stronger integrity climate: they have appointed people in charge of anticorruption policies and are implementing the actions stated in NIAS AP in a relatively satisfying manner;
- certain authorities placed the reports on anticorruption actions implementation on their websites with a delay;
- we found summary (tokenistic) reports on anticorruption actions implementation (in case of MECR), non-compliant with the reporting format set for all authorities – which diminished the score of the ministry;
- MoJ ignored the request at the repeated questionnaire of 2021, which also diminished the score of the institution;
- the biggest problem of the assessed ministries relates to their failure to request integrity records and SIS verifications, which resulted in smaller scores for almost all the subjects, except MoJ;
- another systemic problem of all the subjects is the failure to ensure a response and investigation infrastructure in the case of denunciation of undue influence and disclosure of illicit practices (whistleblowing complaints);

- actions on the identification and treatment of corruption risks in institutions appear to be addressed in a superficial and tokenistic manner.

V. ASSESSMENT RESULTS. RANKING OF THE SUBJECTS OF THE ASSESSMENT

This section of the report provides the picture of the distribution of cumulated score of 9 ministries for implementing the ordinary initiatives distributed by two criteria:

- Criterion **I**: anticorruption institutional infrastructure (score of **maximum 9 points**);
- Criterion **II**: measures for strengthening the institutional integrity (score of **maximum 52 points**);
- **Maximum** possible score: **61 points**.

The assessment grid and the score provided to each indicator and to each ministry is presented in Annexes 1-10 of this Report.

Ministry	Score criterion I	Score criterion II	Total score
MoD	9	39	48
MARDE	8	35	43
MIA	9	41	50
MFAEI	9	31	40
MEI	9	35	44
MECR	8	28	36
MoF	9	39	48
MoJ	8	32	40
MHLSP	8	34	42

The results of the assessment show that **none of the assessed authorities managed to reach the maximum score of 61 points** as per AIA methodology.

Like in the previous exercise⁷, AIA emphasises deficiencies in planning actions and setting objectives, quantifiable and verifiable indicators that would prove that action reached the intended outcome. From this perspective, it is important to carry out planning exercises with greater precision in the future, and to be able to measure the level of anticorruption measures achievement through a higher variety of indicators.

We reiterate the aspect mentioned in the previous report: quality of reports, accuracy of information included, diligence of the authors in proving that the actions taken are compatible with the indicator set. Also, like in anticorruption sectoral plans, *authors of the reports omitted certain actions and they did not present conclusive data about their implementation*. This authorities' approach was punished by lowering the scores.

To check the implementation of actions by ministries, the indicators set in NIAS AP were used/adapted as mentioned above. The degree of achievement was deduced from the self-assessment reports presented by the ministries, after checking the information communicated to the authorities: websites, analysis of reports of other institutions, including of alternative reports of civil society. At the same time, for a series of policies that are more difficult to access, assess and quantify (for example, registry of undue influences, registry of disclosures of illicit practices, development of audit files, etc.), the stake was on the good faith of the authorities that committed to comply with the legal requirements and implement anticorruption policies.

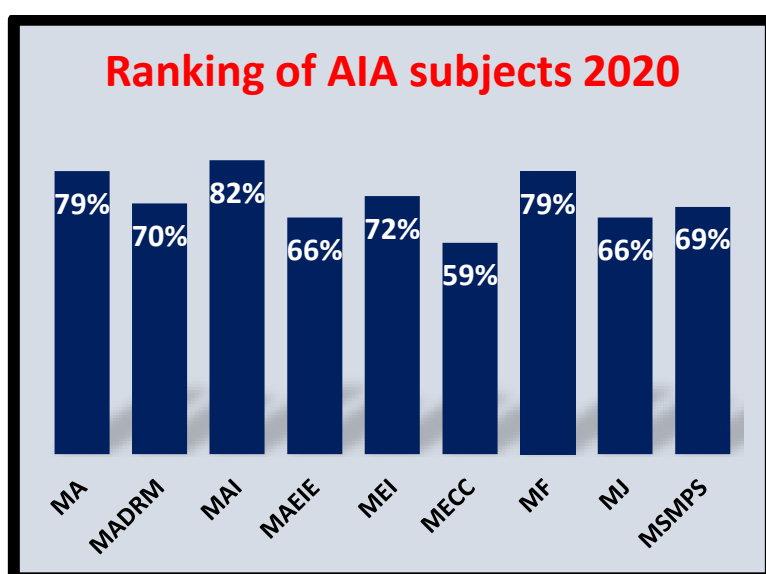
⁷ AIA Methodology testing in 2019 on those 9 anticorruption sectoral plans

According to AIA methodology, a ranking of the assessment subjects is developed following the result of the assessment. The ranking is made up of 3 groups, according to those 3 levels of subjects' qualification, as follows:

Group	Level of qualification	Score obtained
I	Excellent	90% - 100% of the maximum score set in the guidelines for the respective year
II	Good	≥ 60% ≤ 90% of the maximum score set in the guidelines for the respective year
III	Satisfactory	≥ 60% ≤ 90% of the maximum score set in the guidelines for the year

We remind that **in 2020** AIA exercise engaged 9 ministries and the summary of AIA results reveal the following distribution:

Group	Level of qualification	Share of score obtained
I	Excellent	N/A
II	Good	MIA (82%) MoF (79%) MoD (79%) MEI (72%) MARDE (70%) MHLSP (69%) MFAEI (66%) MoJ (66%) MECR (72%)
III	Satisfactory	MECR (59%)



The application of qualifiers set by AIA Methodology prove that no authority can be qualified as 'excellent' in terms of implementing anticorruption – all of them being ranked at the level of 90%. Certain authorities are close to be rated 'excellent', but they did not manage to achieve the necessary performance, as well as the rest of the authorities that can be rated 'good' for implementing ordinary anticorruption initiatives.

As mentioned in the previous chapters, certain ministries did not manage to ensure acceptable institutional infrastructure to ensure the integrity climate: lack of reports on the anticorruption actions implementation, lack of a special directory for the component 'anticorruption' on the website, etc. – which influenced the final classification.

VI. CONCLUSIONS, RECOMMENDATIONS, GOOD PRACTICES

Repeated assessment of anticorruption initiatives in 2020 maintains some of the previous findings, but at the same time, it allowed to draw new findings and recommendations as follows.

FINDINGS:

- The AIA **Object** was represented in 2020 by **10 anticorruption policies**, envisaged in NIAS AP at Pillar II, these policies are opposable to all the **9 ministries** that represented the assessed subjects;
- AIA is an exercise that is easier to apply in relation to homogenous institutions and policies (actions), which allows to shape a much more objective picture of institutions' dedication and commitment to fully transpose the anticorruption toolkit (ordinary initiatives);
- most ministries report that they have created the institutional infrastructure for a stronger integrity climate: they have appointed people in charge of anticorruption policies and are implementing the actions stated in NIAS AP in a relatively satisfying manner;
- it was found that summary (formal) reports on the implementation of anticorruption actions (in case of MECR) were presented. In this context, we reiterate the finding from the previous 2019 assessment, which is still valid for this exercise: *the analysis of the reports presented by the ministries and of fullness of information reveals imperfections and inconsistencies: the tables of the report lack certain actions; in some cases the information included in the report is not full and does not respond to/correlate with the indicator set or, in case of the simultaneous responsibility, actions of only one responsible subject are indicated or irrelevant information is included; impossibility, in certain cases, to check the source/evidence that the action was carried out, because in certain cases there are no web references;*
- actions on the identification and treatment of corruption risks in institutions appear to be addressed in a superficial and tokenistic manner;
- the management of public assets is an anticorruption policy that is not covered by analysis of the assessment subjects: according to the ministries' reports, the information should be submitted with the PPA that keeps a centralised records. Nonetheless, the analysis of web references from the authorities' reports, including of PPA, reveals outdated and summary information, with no clear table on the degree of public assets management effectiveness;
- the policies on the denunciation of undue influences and disclosure of illicit practices are not fully understood and respectively, are not fully capitalised by authorities and in certain situations lack of any internal tools or the failure to adjust them according to the amendments of the regulatory framework were found;
- transparency in decision-making is still a challenge for the subjects of the assessment. Although the websites of all ministries have a directory on decision-making transparency and most of them publish annual reports on decision-making transparency, they are formal, mainly have a quantitative character and there is no analysis of the activities carried out by

the authorities on this dimension. Usually, they use the reporting sample developed by the State Chancellery, which stipulates and comprises only the quantitative aspects;

- monitoring conducted by nongovernmental organisations continues to reveal obstacles both in planning of anticorruption actions and in the quality of authorities reporting, including the deficiencies in implementing a part of those 10 anticorruption policies – the object of this assessment.

RECOMMENDATIONS:

Recommendations from this section target the subjects of the assessment and are aimed at improving the implementation of anticorruption actions (ordinary initiatives) as well as of reporting procedures. It is obvious that public institutions should be further encouraged and supported, including by continuous guiding and training activities about the importance and essence of anticorruption actions.

- we reiterate the recommendation from the previous report according to which *subjects of the assessment are to report the information about the conducted activities with accuracy, to ensure the consistence of the reported information with the achievement indicator set and verification source, web references should be accessible and submitted reports should comprise annexed or direct references to the sources with supporting documents;*

- as regards the policy ***hiring and promoting public agents on the basis of merit and professional integrity***, the ministries (subjects of the assessment) are to ensure the observance of legal requirements related to integrity records and, when necessary, to SIS verifications of public agents (candidates);

- as regards ***compliance with the legal regime of conflicts of interest***, authorities are to ensure and maintain the institutional infrastructure necessary to declare and solve conflicts of interest, to ensure the continuous training of employees, and to request that NAC and NIA conduct certain special trainings on this topic;

- when implementing the policy for ***compliance with the legal regime of gifts*** to adjust the internal provisions and websites to the new provisions of the Government Decision No 116/2020 on the legal regime of gifts, including to develop those two categories of registries: admissible and inadmissible gifts; to ensure the maintenance and periodic update of the gift registers on websites;

- as for the regime of declaring the gifts, it is recommended to review the Gift Register from the Annex to the Government Decision No 116/2020 and add a heading with the exact description of the gift, because this element is not currently reflected in the gift Register;

- as regards the actions necessary to ***prohibit, denunciate and respond to undue influences***, it is still recommended to create an institutional framework: appoint the person responsible, develop and maintain the register and conduct trainings necessary for the employees from the institutions concerned: its essence, connections with the assessment and testing of professional integrity etc.;

- as regards the policy of ***prohibiting, denouncing corruption and protecting whistleblowers***, subjects of assessment shall develop safe internal channels for recording and examining the disclosures of illicit practices (whistleblowing complaints), to appoint persons responsible and maintain the safety/confidentiality of whistleblowers' registries; to organise training courses for institution's employees to inform and raise the awareness of the institution; to take action to strengthen the employees' trust in safety of reporting channels in order to prevent possible revenges;

- as regards ***ensuring transparency in decision-making***, ministries are recommended to daily maintain on the websites the guidelines on this policy, to develop and publish the reports on ensuring the transparency within the time limit set and to ensure systemic conduct of public consultation meetings, with special focus on projects with major impact; the State Chancellery should reassess the format of the report on decision-making transparency, to include the analytical component of the report; at the same time, it is necessary for all the ministries to integrate guidelines on the integrity/anticorruption component in their websites;

- as regards the transposition of the ***policy of transparent and responsible management of public assets and reimbursable and non-reimbursable finances***, there is a need for joint action of the subjects of the assessment and of PPA to update and maintain up to date the system for keeping records and reporting the method of the public assets management; at the same time, all the ministries should assess and ensure the transparent reporting on the external assistance they benefit from, on the purposes of this support and its use and to ensure these reports are published on their own websites;

- as regards ***the compliance with the norms of ethics and deontology***, ministries are recommended to examine the opportunity to develop ethics and deontological codes in compliance with the specifics of the managed area and employees' categories; also, it is necessary to develop plans for employees training and conduct training courses periodically.

ANNEX 1. General Assessment Grid

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	<ul style="list-style-type: none"> • Yes = 3 points • No = 0 points 	3
	N/a	Anticorruption action plan	<ul style="list-style-type: none"> • Developed, approved and published = 3 points • Developed and approved = 2 points • Under development/partially developed (existence of a concept, including anticorruption actions in another plans of the entity): = 1 point • None = 0 points 	3
	N/a	Progress reports	<ul style="list-style-type: none"> • Published on the entity's website = 3 points • Developed = 2 points • Under development/Partially developed = 1 point • None = 0 points 	3
TOTAL				9
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> • Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. • Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	<p>No of employees = No of requested records = 2 points</p> <p>No of employees > No of records = 1 point</p> <p>Records = 0 = 0 points</p> <p>No of employees that fall under the Law No 271/2008 = No of SIS advisory opinions = 2 points</p> <p>No of employees > No of verifications = 1 point</p> <p>No verification of candidates liable for SIS verification was requested = 0 points</p>	4

II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> • Number of conflicts of interest declared and solved in public entities. 	<p>Person appointed to keep the register of conflicts of interest = 2 points</p> <p>The person responsible is not appointed = 0 points</p> <p>There is the register of conflicts of interests = 2 points</p> <p>There is no register of conflicts of interests = 0 points</p> <p>There are practices for policy enforcement = 1 point</p> <p>There are no practices for policy enforcement = 0 points</p>	5
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> • Gift registers published on the websites of public entities 	<p>Person appointed to keep the Gift Register = 2 points</p> <p>The person responsible is not appointed = 0 points</p> <p>Commission for keeping records of gifts is created = 2 points</p> <p>Commission for keeping records of gifts is not created = 0 points</p> <p>Gift Register is published = 2 points</p> <p>Gift Register is not published = 0 points</p> <p>There are practices for policy enforcement = 1 point</p> <p>There are no practices for policy enforcement = 0 points</p>	7
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> • Number of undue influences cases reported and solved in public entities. 	<p>There is register of undue influences = 2 points</p> <p>There is no register of undue influences = 0 points</p> <p>There are practices for policy enforcement = 1 point</p> <p>There are no practices for policy enforcement = 0 points</p>	3
II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> • Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. • Number of whistleblowing complaints submitted with public entities. 	<p>Person/structure appointed to keep the register of whistleblowing complaints = 2 points</p> <p>Person/structure responsible is not appointed = 0 points</p> <p>There is the register of whistleblowing complaints = 2 points</p>	5

		<ul style="list-style-type: none"> • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<p>There is no register of whistleblowing complaints = 0 points</p> <p>There are practices for policy enforcement = 1 point</p> <p>There are no practices for policy enforcement = 0 points</p>	
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<p>Person appointed to coordinate the decision-making transparency = 2 points</p> <p>The person responsible is not appointed = 0 points</p> <p>Annual reports on decision-making transparency are published on the website = 2 points</p> <p>Annual reports on decision-making transparency are not published on the website = 0 points</p> <p>Reports contain quantitative and qualitative indicators = 2 points</p> <p>Reports does not contain quantitative and qualitative indicators = 0 points</p>	6
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<p>Person responsible for access to information of public interest appointed = 2 points</p> <p>The person responsible is not appointed = 0 points</p>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. 	<p>Information about the management of public assets published = 2 points.</p> <p>Information about the management of public assets is not published = 0 points.</p> <p>Information about attracting and managing external assistance, published = 2 points.</p> <p>Information about attracting and managing external assistance, not published = 0 points.</p> <p>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</p>	10

		<ul style="list-style-type: none"> Strengthened annual report on public internal financial control, presented to the Government. Annual and quarterly public procurement plans of public entities, published on their official websites. 	<i>Internal audit filed , strategic plans and annual plans of audit activity, not approved by public entities = 0 points.</i> <i>Statements on good governance, published on the websites of public entities. Internal audit files, strategic plans and annual plans of audit activity, approved by public entities = 2 points.</i> <i>Statements on good governance, published on the websites of public entities. Internal audit filed, strategic plans and annual plans of audit activity are not approved = 0 points.</i> <i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i> <i>Annual and quarterly public procurement plans of public entities, are not published on their official websites = 0 points.</i>	
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> Adopted ethics and deontology codes for public entities that do not have such codes. Annual training plans, including ongoing training, approved. Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Ethics and deontology code not adopted = 0 points.</i> <i>Annual training plans approved = 2 points;</i> <i>Annual training plans are not approved = 0 points.</i> <i>Trainings conducted: Yes – 2 points; No – 0 points</i>	6
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> The risk registers, which also include corruption risks, developed by public entities. Risk register include corruption risks by type of integrity incidents at the level of public entities. Report on the implementation of risk mitigation measures, developed annually 	<i>Risk registers that include corruption risks, developed by public entities = 2 points</i> <i>Risk registers that include corruption risks are not developed = 0 points</i> <i>Report on the implementation of risk mitigation measures, developed annually = 2 points</i> <i>Report on the implementation of risk mitigation measures is not developed = 0 points.</i>	4
TOTAL				52
TOTAL CRITERIA 1 AND 2				61

Annex 2. Ministry of Defence Assessment Grid

ORDINARY INITIATIVES				
<i>Criterion 1. Anticorruption institutional infrastructure</i>				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	• Yes = 3 points	3
	N/a	Anticorruption action plan	• Developed, approved and published = 3 points	3
	N/a	Progress reports	• Published on the entity's website = 3 points	3
TOTAL				9
<i>Criterion 2. Measures for strengthening the institutional integrity</i>				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	<i>No of employees > No of records = 1 point</i> <i>No verification of candidates liable for SIS verification was requested = 0 points</i>	1
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	<i>Person appointed to keep the register of conflicts of interest = 2 points</i> <i>There is the register of conflicts of interests = 2 points</i> <i>There are practices for policy enforcement = 1 point</i> <i>There are no practices for policy enforcement = 0 points</i>	5
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	<i>Person appointed to keep the Gift Register = 2 points</i> <i>Commission for keeping records of gifts is created = 2 points</i> <i>Gift Register is published = 2 points</i> <i>There are practices for policy enforcement = 1 point</i> <i>There are no practices for policy enforcement = 0 points</i>	7

II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> • Number of undue influences cases reported and solved in public entities. 	<p><i>There is the register of undue influences = 2 points</i></p> <p><i>There are practices for policy enforcement = 1 point</i></p> <p><i>There are no practices for policy enforcement = 0 points</i></p>	2
II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> • Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<p><i>Person/structure appointed to keep the register of whistleblowing complaints = 2 points</i></p> <p><i>There is the register of whistleblowing complaints = 2 points</i></p> <p><i>There are no practices for policy enforcement = 0 points</i></p>	4
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<p><i>Person appointed to coordinate the decision-making transparency = 2 points</i></p> <p><i>Annual reports on decision-making transparency are published on the website = 2 points</i></p> <p><i>The reports does not contain quantitative and qualitative indicators = 0 points</i></p>	4
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<p><i>Person in charge of access to information of public interest appointed = 2 points</i></p>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<p><i>Information about the management of public assets published = 2 points.</i></p> <p><i>Information about attracting and managing external assistance, published = 2 points.</i></p> <p><i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</i></p> <p><i>Statements on good governance, published on the websites of public entities = 2 points.</i></p> <p><i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i></p>	8

II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Annual training plans are not approved= 0 points.</i> <i>Trainings conducted: Yes =2 points</i>	4
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. • Risk register include corruption risks by type of integrity incidents at the level of public entities. • Report on the implementation of risk mitigation measures, developed annually 	<i>Risk registers that include corruption risks, developed by public entities = 2 points</i> <i>Report on the implementation of risk mitigation measures is not developed = 0 points.</i>	2
TOTAL				39
TOTAL CRITERIA 1 AND 2				48

Findings of the assessment of the Ministry of Defence:

- Deviations from the recruitment requirements were identified: integrity records and SIS verification are not required anymore;
- Even if training courses are carried out, training plans for the respective action within NIAS AP are not approved;
- Annual reports on the implementation of risk treatment measures are not developed.

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	• Yes = 3 points	3
	N/a	Anticorruption action plan	• Developed, approved and published = 3 points	3
	N/a	Progress reports	Developed = 2 points	2
TOTAL				8
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	No of employees > No of records = 1 point No verification of candidates liable for SIS verification was requested = 0 points	1
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	Person appointed to keep the register of conflicts of interest = 2 points There is the register of conflicts of interests = 2 points There are practices for policy enforcement = 1 point There are no practices for policy enforcement = 0 points	5
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	Person appointed to keep the Gift Register = 2 points Commission for keeping records of gifts is created = 2 points Gift Register is published = 2 points There are no practices for policy enforcement = 0 points	6
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> Number of undue influences cases reported and solved in public entities. 	There is register of undue influences = 2 points There are no practices for policy enforcement = 0 points	2

II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> • Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<i>Person/structure appointed to keep the register of whistleblowing complaints = 2 points</i> <i>There is the register of whistleblowing complaints = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	4
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<i>Person appointed to coordinate the decision-making transparency = 2 points</i> <i>Annual reports on decision-making transparency are not published on the website = 0 points</i> <i>The reports does not contain quantitative and qualitative indicators = 0 points</i>	2
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<i>Person in charge of access to information of public interest appointed = 2 points</i>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<i>Information about the management of public assets is not published = 0 points.</i> <i>Information about attracting and managing external assistance, published = 1 point.</i> <i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</i> <i>Statements on good governance, published on the websites of public entities= 2 points.</i> <i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i>	7
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Annual training plans are not approved= 0 points.</i> <i>Trainings conducted: Yes =2 points</i>	4
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. 	<i>Risk registers that include corruption risks, developed by public entities = 2 points</i> <i>Report on the implementation of risk</i>	2

		<ul style="list-style-type: none"> • Risk register include corruption risks by type of integrity incidents at the level of public entities. • Report on the implementation of risk mitigation measures, developed annually 	<i>mitigation measures is not developed = 0 points.</i>	
TOTAL				35
TOTAL CRITERIA 1 AND 2				43

Assessment findings for MARDE:

- The report on NIAS achievement is not published on the ministry's website;
- According to the self-assessment report, neither integrity records nor SIS verification of candidates and holders of public and public dignity positions are requested;
 - Even if MADRM self-assessment report has a reference to the published gift register and the annual report on the decision-making transparency, the usual access to the website does not allow to identify more plans, reports, registers, including even if the search engine of the website is used;
 - No plan for employees training was developed at the level of the ministry, including in the field of ethics and deontology;
 - The action aiming at 'ensuring the transparent and responsible management of public assets and of external assistance' is not fully ensured: the assistance is approached in an abstract way, without access to reports on the implementation/management of this assistance

ORDINARY INITIATIVES				
<i>Criterion 1. Anticorruption institutional infrastructure</i>				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	<i>Yes = 3 points</i>	3
	N/a	Anticorruption action plan	<i>Developed, approved and published = 3 points</i>	3
	N/a	Progress reports	<i>Published on the entity's website = 3 points</i>	3
TOTAL				9
<i>Criterion 2. Measures for strengthening the institutional integrity</i>				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> • Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. • Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	<i>No of employees > No of records = 1 point</i> <i>No verification of candidates liable for SIS verification was requested = 0 points</i>	1
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> • Number of conflicts of interest declared and solved in public entities. 	<i>Person appointed to keep the register of conflicts of interest = 2 points</i> <i>There is the register of conflicts of interests = 2 points</i> <i>There are practices for policy enforcement = 1 point</i> <i>There are no practices for policy enforcement = 0 points</i>	4
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> • Gift registers published on the websites of public entities 	<i>Person appointed to keep the Gift Register = 2 points</i> <i>Commission for keeping records of gifts is created = 2 points</i> <i>Gift Register is published = 1 point</i> <i>There are practices for policy enforcement = 1 point</i>	6
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> • Number of undue influences cases reported and solved in public entities. 	<i>There is the register of undue influences = 2 points</i> <i>There are practices for policy enforcement = 1 point</i>	3

II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> • Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<i>Person/structure appointed to keep the register of whistleblowing complaints = 2 points</i> <i>There is the register of whistleblowing complaints = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	4
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<i>Person appointed to coordinate the decision-making transparency = 2 points</i> <i>Annual reports on decision-making transparency are published on the website = 2 points</i> <i>Reports contain quantitative and qualitative indicators = 1 point</i>	5
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<i>Person in charge of access to information of public interest appointed = 2 points</i>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<i>Information about the management of public assets is not published = 0 points.</i> <i>Information about attracting and managing external assistance, published = 2 points.</i> <i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</i> <i>Statements on good governance, published on the websites of public entities. Internal audit files, strategic plans and annual plans of audit activity, approved by public entities = 2 points.</i> <i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i>	8
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Annual training plans approved = 2 points;</i> <i>Trainings conducted: Yes = 2 points</i>	6
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. 	<i>Risk registers that include corruption risks, developed by public entities = 2 points</i>	2

		<ul style="list-style-type: none"> • Risk register include corruption risks by type of integrity incidents at the level of public entities. • Report on the implementation of risk mitigation measures, developed annually 	<i>Report on the implementation of risk mitigation measures is not developed = 0 points.</i>	
TOTAL				41
TOTAL CRITERIA 1 AND 2				50

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	• Yes = 3 points	3
	N/a	Anticorruption action plan	• Developed, approved and published = 3 points	3
	N/a	Progress reports	• Published on the entity's website = 3 points	3
TOTAL				9
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	<p>No of employees = No of requested records = 2 points</p> <p>No of employees that fall under the Law No 271/2008 = No of ISS advisory opinions = 2 points</p>	4
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	<p>Person appointed to keep the register of conflicts of interest = 2 points</p> <p>There is the register of conflicts of interests = 2 points</p> <p>There are no practices for policy enforcement = 0 points</p>	4
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	<p>Person appointed to keep the Gift Register = 2 points</p> <p>Commission for keeping records of gifts is created = 2 points</p> <p>Gift Register is published = 2 points</p> <p>There are practices for policy enforcement = 1 point</p> <p>There are practices for policy enforcement = 0 points</p>	6
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> Number of undue influences cases reported and solved in public entities. 	<p>There is no register of undue influences = 0 points</p> <p>There are no practices for policy enforcement = 0 points</p>	0

II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> • Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<i>Person/structure appointed to keep the register of whistleblowing complaints is not appointed = 0 points</i> <i>There is no register of whistleblowing complaints = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	0
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<i>Person appointed to coordinate the decision-making transparency = 2 points</i> <i>Annual reports on decision-making transparency are published on the website = 2 points</i> <i>Reports contain quantitative and qualitative indicators = 1 point</i>	5
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<i>Person in charge of access to information of public interest appointed = 2 points</i>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<i>Information about the management of public assets is not published = 0 points.</i> <i>Information about attracting and managing external assistance is not published = 0 points.</i> <i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</i> <i>Statements on good governance, published on the websites of public entities = 2 points.</i> <i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i>	6
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Annual training plans are not approved= 0 points.</i> <i>Trainings conducted: No =0 points</i>	2
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. 	<i>Risk registers that include corruption risks,</i>	2

		<ul style="list-style-type: none"> • Risk register include corruption risks by type of integrity incidents at the level of public entities. • Report on the implementation of risk mitigation measures, developed annually 	<i>developed by public entities = 2 points</i> <i>Report on the implementation of risk mitigation measures is not developed = 0 points.</i>	
TOTAL				31
TOTAL CRITERIA 1 AND 2				40

Findings of the assessment of MFAEI:

- There is no information about attracting and managing external assistance;
- The training plan for training the employees was not approved and training courses for employees were not conducted;
- Annual reports on the implementation of risk mitigation measures are not developed.

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	• Yes = 3 points	3
	N/a	Anticorruption action plan	• Developed, approved and published = 3 points	3
	N/a	Progress reports	• Published on the entity's website = 3 points	3
TOTAL				9
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	<i>No of employees > No of records = 1 point</i> <i>No verification of candidates liable for SIS verification was requested = 0 points</i>	1
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	<i>Person appointed to keep the register of conflicts of interest = 2 points</i> <i>There is the register of conflicts of interests = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	4
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	<i>Person appointed to keep the Gift Register = 2 points</i> <i>Commission for keeping records of gifts is created = 2 points</i> <i>Gift Register is not published = 0 points</i> <i>There are no practices for policy enforcement = 0 points</i>	4
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> Number of undue influences cases reported and solved in public entities. 	<i>There is register of undue influences = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	2
II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> Number of corruption cases reported by public agents to the 	<i>Person/structure appointed to keep the register of</i>	2

		heads of public entities and anticorruption agencies. <ul style="list-style-type: none"> • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<i>whistleblowing complaints = 2 points</i> <i>There is no register of whistleblowing complaints = 0 points</i> <i>There are no practices for policy enforcement = 0 points</i>	
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<i>Person appointed to coordinate the decision-making transparency = 2 points</i> <i>Annual reports on decision-making transparency are published on the website = 2 points</i> <i>Reports contain quantitative and qualitative indicators = 1 point (only quantitative indicators)</i>	5
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<i>Person in charge of access to information of public interest appointed = 2 points</i>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<i>Information about the management of public assets is not published = 0 points.</i> <i>Information about attracting and managing external assistance, published = 2 points.</i> <i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</i> <i>Statements on good governance, published on the websites of public entities = 2 points.</i> <i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i>	8
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Annual training plans approved = 2 points;</i> <i>Trainings conducted: Yes = 2 points;</i>	6
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. • Risk register include corruption risks by type of 	<i>Risk registers that include corruption risks, developed by public entities = 1 point</i> <i>Report on the implementation of risk</i>	1

		integrity incidents at the level of public entities. • Report on the implementation of risk mitigation measures, developed annually	<i>mitigation measures is not developed = 0 points.</i>	
TOTAL				35
TOTAL CRITERIA 1 AND 2				44

Assessment findings for MEI:

- The employment policy is not implemented fully, particularly in terms of requesting integrity records and verifying the candidates for/holders of public positions and public dignity positions;
- The management of corruption risks is not updated and the annual reports on the management of these risks are not developed or are not available to the public;
- The gift registers are not made available to the public;
- Apparently, the anticorruption policy on the management of public assets and of external assistance is followed strictly

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	• Yes = 3 points	3
	N/a	Anticorruption action plan	• Developed, approved and published = 3 points	3
	N/a	Progress reports	• Developed = 2 points	2
TOTAL				8
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	No of employees = No of requested records = 2 points No verification of candidates liable for SIS verification was requested = 0 points	2
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	Person appointed to keep the register of conflicts of interest = 2 points There is the register of conflicts of interests = 2 points There are practices for policy enforcement = 1 point	5
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	Person appointed to keep the Gift Register = 2 points Commission for keeping records of gifts is created = 2 points Gift Register is not published = 0 points There are no practices for policy enforcement = 0 points	4
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> Number of undue influences cases reported and solved in public entities. 	There is register of undue influences = 2 points There are no practices for policy enforcement = 0 points	2
II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. 	There is no person/structure appointed to keep the register of	0

		<ul style="list-style-type: none"> • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<i>whistleblowing complaints= 0 points</i> <i>There is no register of whistleblowing complaints = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<i>Person appointed to coordinate the decision-making transparency = 2 points</i> <i>Annual reports on decision-making transparency are published on the website = 2 points</i> <i>Reports contain quantitative and qualitative indicators = 1 point</i>	5
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<i>Person in charge of access to information of public interest appointed = 2 points</i>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<i>Information about the management of public assets is not published = 0 points.</i> <i>Information about attracting and managing external assistance is not published = 0 points.</i> <i>Internal audit files, strategic plans and annual plans of audit activity, not approved by public entities = 0 points.</i> <i>Statements on good governance, published on the websites of public entities = 2 points.</i> <i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i>	4
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Annual training plans are not approved= 0 points.</i> <i>Trainings conducted: No =0 points</i>	2
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. • Risk register include corruption risks by type of integrity incidents at the level of public entities. • Report on the implementation of risk 	<i>Risk registers that include corruption risks, developed by public entities = 2 points</i> <i>Report on the implementation of risk mitigation measures is not developed = 0 points.</i>	2

		mitigation measures, developed annually		
TOTAL				28
TOTAL CRITERIA 1 AND 2				36

MECR findings:

- The self-assessment report presented by MECR is short and does not reflect all the compartments of the assessment, neither the requested indicators;
- No Report on the conduct of actions from Pillar II, Priority II.1 of NIAS was published on MECR website;
- Conclusive data about the observance of the declaration of gifts regime are not provided, the Register is not published on the website;
- The aspects related to attracting and managing the external assistance are not reflected in the report; as regards the management of public assets, the reports of the Court of Accounts are mentioned abstractly;
- MECR employees do not have a training plan and, apparently, did not benefit from training in the field of professional ethics;
- There are no annual reports on the management of risks at the level of ministry

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	• Yes = 3 points	3
	N/a	Anticorruption action plan	• Developed, approved and published = 3 points	3
	N/a	Progress reports	• Published on the entity's website = 3 points	3
TOTAL				9
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	<i>No of employees > No of records = 1 point</i> <i>No verification of candidates liable for SIS verification was requested = 0 points</i>	1
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	<i>Person appointed to keep the register of conflicts of interest = 2 points</i> <i>There is the register of conflicts of interests = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	4
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	<i>Person appointed to keep the Gift Register = 2 points</i> <i>Commission for keeping records of gifts is created = 2 points</i> <i>Gift Register is published = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	6
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> Number of undue influences cases reported and solved in public entities. 	<i>There is register of undue influences = 2 points</i> <i>There are no practices for policy enforcement = 0 points</i>	2
II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. 	<i>Person/structure appointed to keep the register of whistleblowing complaints = 2 points</i>	2

		<ul style="list-style-type: none"> • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<p><i>There is no register of whistleblowing complaints = 0 points</i></p> <p><i>There are no practices for policy enforcement = 0 points</i></p>	
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<p><i>Person appointed to coordinate the decision-making transparency = 2 points</i></p> <p><i>Annual reports on decision-making transparency are published on the website = 2 points</i></p> <p><i>Reports contain quantitative and qualitative indicators = 1 point</i></p>	5
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<p><i>Person in charge of access to information of public interest appointed = 2 points</i></p>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<p><i>Information about the management of public assets is not published = 0 points.</i></p> <p><i>Information about attracting and managing external assistance, published = 2 points.</i></p> <p><i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</i></p> <p><i>Statements on good governance, published on the websites of public entities. Internal audit files, strategic plans and annual plans of audit activity, approved by public entities = 2 points.</i></p> <p><i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i></p>	8
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<p><i>Ethics and deontology code adopted = 2 points;</i></p> <p><i>Annual training plans approved = 2 points;</i></p> <p><i>Trainings conducted: Yes = 2 points</i></p>	6
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. 	<p><i>Risk registers that include corruption risks, developed by public entities = 2 points</i></p>	3

		<ul style="list-style-type: none"> • Risk register include corruption risks by type of integrity incidents at the level of public entities. • Report on the implementation of risk mitigation measures, developed annually 	<i>Report on the implementation of risk mitigation measures, developed annually = 1 point</i>	
TOTAL				39
TOTAL CRITERIA 1 AND 2				48

Findings of the assessment of the Ministry of Finance:

- The report is developed in compliance with the indicators set in the NIAS AP;
- Deficiencies in terms of requesting integrity records and verifying the candidates/holders of public and public dignity positions
- The reports on decision-making transparency contain only quantitative indicators;

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	<ul style="list-style-type: none"> Yes = 3 points No = 0 points 	3
	N/a	Anticorruption action plan	<ul style="list-style-type: none"> Developed, approved and published = 3 points Developed and approved = 2 points Under development/partially developed (existence of a concept, anticorruption actions included in another plans of the entity): = 1 point None = 0 points 	3
	N/a	Progress reports	<ul style="list-style-type: none"> Developed = 2 points 	2
TOTAL				8
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	No of employees = No of requested records = 2 points No of employees that fall under the Law No 271/2008 = No of ISS advisory opinions = 2 points	4
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	Person appointed to keep the register of conflicts of interest = 2 points There is the register of conflicts of interests = 2 points There are no practices for policy enforcement = 0 points	4
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	Person appointed to keep the Gift Register = 2 points Commission for keeping records of gifts is created = 2 points Gift Register is not published = 0 points There are practices for policy enforcement = 0 points	4
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> Number of undue influences cases reported and solved in public entities. 	The register of undue influence exists = 1 point	1

			<i>There are no practices for policy enforcement = 0 points</i>	
II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> • Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<i>There is no person/structure appointed to keep the register of whistleblowing complaints= 0 points</i> <i>There is no register of whistleblowing complaints = 0 points</i> <i>There are no practices for policy enforcement = 0 points</i>	0
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<i>Person appointed to coordinate the decision-making transparency = 2 points</i> <i>Annual reports on decision-making transparency are published on the website = 2 points</i> <i>The reports contain quantitative and qualitative indicators = 1 point (only quantitative indicators)</i>	5
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<i>Person in charge of access to information of public interest appointed = 2 points</i>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<i>Information about the management of public assets is not published = 0 points.</i> <i>Information about attracting and managing external assistance is not published = 0 points.</i> <i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities are not approved = 0 points.</i> <i>Statements on good governance, published on the websites of public entities = 2 points.</i> <i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i>	4
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<i>Ethics and deontology code adopted = 2 points;</i> <i>Annual training plans approved = 2 points;</i> points <i>Trainings conducted: Yes =2 points</i>	6

II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. • Risk register include corruption risks by type of integrity incidents at the level of public entities. • Report on the implementation of risk mitigation measures, developed annually 	<i>Risk registers that include corruption risks, developed by public entities = 2 points</i> <i>Report on the implementation of risk mitigation measures is not developed = 0 points.</i>	2
TOTAL				32
TOTAL CRITERIA 1 AND 2				40

Assessment findings:

- The reports on NIAS achievement are not published on the Ministry's website
- The action on ensuring the decision-making transparency was not reported (II.1.9);
- The reports and plans for the management of public assets and of external assistance are not published on the MoJ website;
 - Even if the gift register from the website is mentioned, it does not exist
 - It is worth mentioning the activity of the MoJ to request integrity records and verification of candidates and holders of public and public dignity positions

ORDINARY INITIATIVES				
Criterion 1. Anticorruption institutional infrastructure				
Action No	Action	Indicator	Assessment/points	Maximum score
	N/a	Responsible person appointed	Yes = 3 points	3
	N/a	Anticorruption action plan	Developed, approved and published = 3 points	3
	N/a	Progress reports	Developed = 2 points	2
TOTAL				8
Criterion 2. Measures for strengthening the institutional integrity				
Action No	Action	Indicator	Assessment indicators/points	Maximum score
II.1.1.	Employ and promote public agents on the basis of merit and professional integrity	<ul style="list-style-type: none"> Number of public agents employed on a competitive basis or as a result of transfers from other public entities; number of integrity records requested by public entities upon employment. Number of public agents employed/reconfirmed in positions following the verification in compliance with the Law No 271/2008 Verification of Public Office Holders and Candidates 	No of employees = No of requested records = 2 points No of employees that fall under the Law No 271/2008 = No of ISS advisory opinions = 2 points	4
II.1.4.	Comply with the legal regime of conflicts of interest and prohibit favouritism	<ul style="list-style-type: none"> Number of conflicts of interest declared and solved in public entities. 	Person appointed to keep the register of conflicts of interest = 2 points There is the register of conflicts of interests = 2 points There are practices for policy enforcement = 1 point	5
II.1.5.	Ensure compliance with the gift regime	<ul style="list-style-type: none"> Gift registers published on the websites of public entities 	Person appointed to keep the Gift Register = 2 points Commission for keeping records of gifts is created = 2 points Gift Register is published = 2 points There are no practices for policy enforcement = 0 points	6
II.1.6.	Prohibit, denunciate and respond to undue influences	<ul style="list-style-type: none"> Number of undue influences cases reported and solved in public entities. 	There is register of undue influences = 2 points There are no practices for policy enforcement = 0 points	2
II.1.7.	Prohibit and report corruption cases; protect whistleblowers	<ul style="list-style-type: none"> Number of corruption cases reported by public agents to the heads of public entities and anticorruption agencies. 	Person/structure appointed to keep the register of whistleblowing complaints = 2 points	2

		<ul style="list-style-type: none"> • Number of whistleblowing complaints submitted with public entities. • Number of whistleblowing complaints submitted with NAC. • Number of whistleblowers under protection 	<p><i>There is no register of whistleblowing complaints = 0 points</i></p> <p><i>There are practices for policy enforcement = 1 point</i></p> <p><i>There are no practices for policy enforcement = 0 points</i></p>	
II.1.9	Comply with decision-making transparency	<ul style="list-style-type: none"> • Annual reports on decision-making transparency published on the websites of public entities. • Established quantitative and qualitative indicators on decision-making transparency. • Annual report of the State Chancellery on decision-making transparency at CPA and LPA level 	<p><i>Person appointed to coordinate the decision-making transparency = 2 points</i></p> <p><i>Annual reports on decision-making transparency are not published on the website = 0 points</i></p> <p><i>The reports contain quantitative and qualitative indicators = 1 point</i></p>	3
II.1.10	Ensure access to information of public interest	<ul style="list-style-type: none"> • People in charge of access to information of public interest, appointed within authorities. 	<p><i>Person in charge of access to information of public interest appointed = 2 points</i></p>	2
II.1.11	Ensure transparent and responsible management of public assets and of external assistance	<ul style="list-style-type: none"> • Information about the management of public assets published. • Information about attracting and managing external assistance, published. • Reports of public entities that attracted external funds about the result (performance) obtained following this support. • Internal audit files, strategic and annual plans of audit activity, approved by public entities. • Statements on good governance, published on the websites of public entities. • Strengthened annual report on public internal financial control, presented to the Government. • Annual and quarterly public procurement plans of public entities, published on their official websites. 	<p><i>Information about the management of public assets is not published = 0 points.</i></p> <p><i>Information about attracting and managing external assistance is not published = 0 points.</i></p> <p><i>Internal audit files, strategic plans and annual plans of audit activity, approved by public entities. = 2 points.</i></p> <p><i>Statements on good governance, published on the websites of public entities = 2 points.</i></p> <p><i>Annual and quarterly public procurement plans of public entities, published on their official websites = 2 points.</i></p>	6
II.1.12	Implement and comply with ethic and deontology norms	<ul style="list-style-type: none"> • Adopted ethics and deontology codes for public entities that do not have such codes. • Annual training plans, including ongoing training, approved. • Number of trainings and public agents trained in ethics and deontology. 	<p><i>Ethics and deontology code is not adopted = 2 points.</i></p> <p><i>Annual training plans are not approved = 0 points.</i></p> <p><i>Trainings conducted: Yes = 2 points</i></p>	4
II.1.14	Implement the corruption risks management	<ul style="list-style-type: none"> • The risk registers, which also include corruption risks, developed by public entities. • Risk register include corruption risks by type of integrity incidents at the level of public entities. 	<p><i>Risk registers that include corruption risks, developed by public entities = 2 points</i></p> <p><i>Report on the implementation of risk mitigation measures is not developed = 0 points.</i></p>	2

		<ul style="list-style-type: none"> • Report on the implementation of risk mitigation measures, developed annually 		
TOTAL				34
TOTAL CRITERIA 1 AND 2				42

**QUESTIONNAIRE ON MINISTRIES' IMPLEMENTATION OF ANTICORRUPTION POLICIES
IN 2020**

#	Anticorruption action/policy	Check up questions	Answer
1.	Compliance with the legal regime of conflicts of interest and prohibition of favouritism	1. Have conflicts of interest been stated/registered in the institution?	
		2. If yes, indicate the number	
		3. If conflicts of interests were registered and solved in the institution, please provide details about the procedure applied: people engaged in solving conflicts of interest, solutions adopted, etc.	
		4. Did you request the NIA support in solving the conflicts of interest?	
		5. In your opinion, if conflicts of interest have not been stated/registered in the institution, which would be the reason? a) There are no conflicts of interest b) The institution's employees do not understand what a conflict of interests is c) Other (please specify)	
2.	Compliance with the legal regime of gifts	1. Were gifts registered in the institution's register?	
		2. If yes, what happened with the gifts? a) They were redeemed (indicate the number) b) They were transferred into the management of the authorities (indicate the number) c) They were sent to NAC (in the case of inadmissible gifts)	
		3. In your opinion, if gifts have not been registered, which would be the reason: a) Gifts are not offered b) The institution's employees do not know the rules of gift declaration c) The institution's employees do not distinguish between admissible and inadmissible gifts d) Other (please specify)	
		4. Was the gift register adjusted to the provisions of GD No 116/2020?	
		5. Indicate the web reference to the latest version of the institution's gift register	
3	Prohibition, denunciation and response to undue influences	1. Have undue influence been reported/registered in the institution?	
		2. If yes, indicate the number	
		3. If undue influences were registered and solved in the institution, please provide details about the applied procedure: people engaged in the process, adopted solutions, etc.	
		4. Did you request the NAC support while responding to undue influences?	

		<p>5. In your opinion, if undue influences have not been reported/registered in the institution, which would be the reason:</p> <p>a) There are no undue influences</p> <p>b) The institution's employees do not know/understand what undue influence is</p> <p>c) Others (please specify)</p>	
4	Prohibition of any corruption elements and protection of whistleblowers	1. Have disclosures of illegal practices been registered in the institution's register (whistleblowing complaints)?	
		2. If yes, indicate the number	
		3. If whistleblowing complaints were registered and solved in the institution, please provide details about the applied procedure: people engaged in the process, adopted solutions, etc.	
		4. Did you request the NAC support during the registration and examination of whistleblowing complaints?	
		<p>5. In your opinion, if whistleblowing complaints have not been registered in the institution, which would be the reason:</p> <p>a) There are no illicit practices</p> <p>b) The institution's employees do not know/understand what a whistleblowing complaint is</p> <p>c) The institution's employees are afraid</p> <p>d) Communication channels are not safe</p> <p>e) Others (please specify)</p>	
		<p>6. Communication channels of whistleblowers established within the institution:</p> <p>a) Special e-mail address for whistleblowers;</p> <p>b) Mailbox within the institution</p> <p>c) Section on the website or intranet</p> <p>d) Telephone line</p> <p>e) Others</p>	
5	Ensuring transparency in decision-making	1. Indicate the number of decisions subject to public consultations	
		2. Have public information meetings been organised for stakeholders following the public consultation of decisions? If yes, indicate the number	
		3. Indicate the number of summaries (summary tables) of proposals received following public consultations. Indicate the source of summaries publication	