



Factual findings report
Agenția Națională de Integritate

External audit of ANI management for 2017

April 2018

Summary

Introduction	2
Engagement’s objectives and applicability area	2
Procedures performed and factual findings	2
1. Objectives and Scope of the Project	4
2. Project approach	4
2.1. Planning	4
2.2. Developing the engagement plan	4
2.3. Performing the verification procedures	5
2.4 Reporting	6
3. Status of Action Measures Implementation Corresponding to ANI Strategy for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets (2016 – 2020)	7
4. Remediation status for deficiencies identified during the verifications for the period 2009-2016	8
5. IT System Evaluation	9
6. Work Methodologies specific to each verified area	11
6.1. ANI Management	11
<i>President, Vice-president and General Secretary</i>	11
6.2. Integrity Inspection	12
Aspects regarding the activity of the Integrity Inspection	14
Analysis and Prevention Department	16
6.3. Internal Public Audit Department	18
6.4. Legal, Public Relations and Communication General Directorate	19
Communication, Public Relations and Strategy Directorate	21
6.5. Human Resources Department	22
Labor Protection Compartment	23
6.6. Economics General Directorate	24
Financial and Accounting Department (SFC) – Accounting Compartment	24
Public Procurement, Investments and Patrimony Management Compartment – BAPIGP	25
6.7. The activity of the Commission for monitoring the internal control management system at ANI level	26
8. Use of the present report	28
ANNEX 1 List of procedures analyzed	29
APPENDIX 2 Implementation Status of action measures related to ANI Strategy for combating and preventing undue accumulation of assets, conflicts of interest and states of incompatibility	37

Introduction

According to contract no. 18884 from February 14, 2018 (hereinafter "the Contract"), SC Deloitte Audit SRL (hereinafter "Deloitte") was engaged by the National Integrity Agency (hereinafter "ANI", "the Agency") to perform the external audit on ANI's management, as required in art. 32 paragraph (1) of Law no. 144/2007 and the provisions included in Law no. 176/2010 on the integrity in exercising public functions and dignities, for the amendment and supplementation of Law no. 144/2007 on the establishment, organization and functioning of ANI and for the amendment and supplementation of other acts of legislation (hereinafter "Law no. 176/2010").

The agreed work phases in the Initial Report for performing the engagement were:

- Understanding the engagement's scope;
- Planning the work program;
- Performing the work program;
- Forming the conclusions and drafting the factual findings report.

Engagement's objectives and applicability area

The quality of ANI's management was assessed during the 1st and the 16th of April 2018, by a team of Deloitte qualified professionals, based on interviews, examination of documentation and detailed tests.

During the engagement, Deloitte's team performed the fieldwork in close cooperation with ANI representatives, in order to achieve the goals stated in the technical tender book.

The project was performed in accordance with:

- The terms of reference included in the technical offer "External audit of ANI's management for the year 2017", Appendix to the Contract;
- International Standards on Related Services (ISRS) – 4400 Engagements to perform agreed – upon procedures;
- Legal framework applicable to ANI.

The reference period for this report is the year 2017 exclusively, unless otherwise mentioned.

Procedures performed and factual findings

We have planned and performed the verifications in accordance with the objective and scope of this engagement, and with the agreed-upon procedures, as they are detailed in Chapter 3 – "Approach" of this Report. All the procedures detailed in Chapter 3 have been performed in accordance with the terms agreed within the Contract.

Following the agreed upon procedures performed, we obtained sufficient and appropriate evidence to draft a factual findings report in accordance with the International Standards on Related Services (ISRS) – "4400 Engagements to perform agreed – upon procedures". The procedures performed during this engagement are neither a financial audit, nor a review and thus we do not express any assurance regarding the performance of ANI management and financial statements for the year ended December 31, 2017.

Observations identified in 2017

Total observations with major impact	3
Total observations with medium impact	14
Total observations with minimum impact	18

We have also assessed the remediation status of the deficiencies identified during the external audit of ANI management for the years 2009, 2010, 2011, 2012, 2013, 2014, 2015 and 2016 as well as the implementation status for the measures within the Action Plan for the implementation of the Strategy for control and prevention in accumulating unjustified assets, conflict of interest and incompatibilities.

The remediation status of the deficiencies formulated in the factual findings report for the years 2009 – 2016 is presented within the table below:

Total number of deficiencies for which the recommendations have been implemented	12
Total number of deficiencies for which the recommendations have been partially implemented	12
Total number of deficiencies for which the recommendations have not been implemented	7

Findings

The results of the application of the agreed-upon procedures performed according with the International Standards on Related Services (ISRS) – 4400 Engagements to perform agreed – upon procedures, are presented within this report.

Following the assessment of ANI’s activity performed during the year 2017, we have identified ANI’s functionality parameters, which are based upon ANI’s management efforts made because of the changes at the management level, efforts to improve the processes and to increase the efficiency of the activity in order to achieve the objectives planned. The results were as follows:

- continue efforts to implement the measures of the Strategy for preventing and sanctioning conflicts of interest, incompatibilities and unjustified assets for the period 2016-2020; defining an ANI Integrity Plan regarding the implementation of the National Anticorruption Strategy 2016-2020;
- the operationalization of the PREVENT system in June 2017;
- achieving a 77% status on the "implemented" and "partially implemented" status of the performance improvement recommendations;
- the transfer of good practices and the strengthening of international cooperation in the area of preventing and fighting corruption, with institutions which have similar competences to the National Integrity Agency;
- full training of ANI staff according to the training needs identified following the performance evaluation process;
- Increasing communication with the public, through the Newsletter section inserted on the Agency's website.

Areas where remediation action is required from management addresses the following aspects, noted as result of the verification performed:

- Agency lacks an entire spectrum of competences required to manage the systems/technologies it is currently using. Consequently, continuity in managing and operating the IT systems depends on the services provided by external suppliers.
- Work and storage space is insufficient;

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SC DELOITTE AUDIT SRL
4-8 Nicolae Titulescu Road
District 1, Bucharest, Romania

***For signature, please refer
to the original Romanian
version***

1.Objectives and Scope of the Project

According to the Contract, engagement's specific object, as defined in the Tender Documentation, is to add value, by taking an objective picture of the real activities performed within ANI, and improve the overall National Integrity Agency management.

2.Project approach

Based on the project's specific objectives, we performed the engagement in four phases, as follows:

1. Planning the engagement;
2. Developing the work program;
3. Performing the work program;
4. Reporting results.

2.1 Planning

During the planning phase, we performed the following steps:

- Drafted the preliminary request for information;
- Organized the „kick-off meeting“;
- Determined the professional standards applicable to the engagement;
- Obtained the necessary information for designing the evaluation program and for the preliminary analysis of the risks identified in this phase.

On February 28, 2018, before the beginning of the fieldwork, we organized, at ANI's headquarters, a kick-off meeting with the following results:

- Presenting the team members involved in the project, both from ANI's side and Deloitte's side, and their responsibilities;
- Agreeing the deadlines for performing the procedures and for reporting;
- Agreeing the communication protocol between Deloitte and ANI team throughout the project.

2.2 Developing the engagement plan

In this phase, we assessed the internal procedures and controls in order to plan the evaluation. Based on the analysis of the documents made available to us, we developed the verification plan following the structure presented below:

- **Identifying the areas subject to verifications**, including the main activity directions of ANI (verifying the assets, conflict of interest and incompatibilities) as well as the support activities (internal audit, finance, legal, human resources and public relation).
- **Drafting the interview plan in order to identify the specific risks**, including the format and the content of the interview templates with the relevant personnel.
- **Identifying verification techniques to be used** through:
 - The preliminary analysis of the decision making process, of the actions taken during the year 2016, in order to use these in the sampling process; based on this analysis, we drafted the testing strategy so that the processes under evaluation are relevant for the scope of our project;
 - Asserting the format and content of the detail testing.

By the end of these two phases, on March 13, 2018, we delivered the Initial Report to ANI's management for approval, in which we made a presentation of the verification procedures applicable to each ANI structure, sampling methodology and engagement planning phases.

2.3 Performing the verification procedures

During this phase, we performed the procedures agreed upon with ANI management that included tests and interviews in order to conclude whether policies, procedures and systems are compliant with national legislation in force, as well as best practices in the area.

The verification procedures have been performed on a sample of management actions and in several stages, as follows:

- a. Sampling;
- b. Verification of the fulfilment of management duties by ANI management, on the basis of the sample selected:
 - Verification of procedural rules application,
 - Analysis of ANI organization effectiveness considering its objectives,
 - Verification of the communication system within ANI,
 - Analysis of management decisions instrumentation.
- c. Analysis of the Agency's personnel workload;
- d. Verification of the information system for assessing the degree it fulfils the necessities deriving from the specific activities the Agency has to achieve;
- e. Phases of management quality assessment procedure – verification of the existence and adequacy of the following elements:
 - reporting chart/matrix,
 - decision making system within ANI,
 - documents workflow,
 - operating procedures,
 - duties and responsibilities, limitations and delegations of competence, relationship chart/matrix, clearly formulated in the Internal Organization Manual and in the mandate contracts of the persons within ANI management during 2017.

Our verification plan included verification procedures as follows:

• **Acknowledging and understanding the internal regulations and procedures**

During this phase we analyzed the Internal Organization Manual approved by ANI President through Order no 7962/4.05.2016 regarding the reorganization of ANI by comparing their provisions to Law no 144/2007, as well as with the provisions of Law no 176/2010 regarding the integrity in the exercise of public functions and dignities for modifying and completing Law no 144/2007 on the establishment, organization and functioning of ANI and to amend and supplement other regulations (hereinafter "Law no 176/2010"), we became familiar with the internal operating regulations and procedures, we identified the responsibilities for each department, tasks allocation, compliance with applicable laws, etc.

We mention that the ROF is the document that sets up ANI's organizational structure, the duties, tasks and responsibilities of ANI's employees. The document is approved through an Order issued by the President and is in conformity with the provisions included in Law 144/2007, art 6 para 4.

Please refer to Appendix 1 for a complete list of the operating procedures examined.

• **Evaluation of the primary documents** (procedures, internal regulations, orders, internal notes, minutes, evaluation guidelines, etc.), in order to understand the significant terms and conditions, both individually and globally, for:

- Assessing their area of applicability, and
- Assessing the accuracy and operating effectiveness of the procedures.

- **Investigation, confirmation and specific detail tests**

Investigation consists of obtaining the information from competent persons within ANI through interviews.

Confirmation consists of obtaining the answers as result of an investigation in order to corroborate it with the information from existent procedures.

The **verification** was performed on a sample of management actions divided in the following phases:

I. Sampling

Based on the understanding of ANI's working procedures and internal processes, we selected a sample of management actions from each department in order to assess compliance with the legislation in force and ANI's internal procedures/manuals/regulations applicable to each organizational unit. In determining and selecting the sample, we considered each department's specific activity and, where considered necessary, we stratified the population in order to ensure the evaluation of a much representative area of management actions for the respective department.

Please refer to Chapter 6 and Chapter 7 for details regarding the sampling methodology used for each department, agreed in the Initial Report.

II. Assessing the implementation of the procedural rules

We assessed ANI's internal procedures and the compliance with legal framework. The main evaluation criteria were:

- formalization and compliance with the procedures;
- use of template documents;
- documentation of the analysis and evaluation indicators.

III. Assessing the achievement of duties

The main evaluation criteria were:

- decision management and instrumentation process;
- compliance with the regulation duties;
- compliance with deadlines.

These points integrate all the regulation elements that must be complied with as part of the procedure. The details regarding the elements to be verified were established based on audit trails and applicable internal manuals, according to the specific situation.

2.4 Reporting

Following the evaluations made, Deloitte submits to ANI management this factual findings report containing the deficiencies identified regarding internal processes and/or procedures applicable at the Agency's level, as detailed in Chapter 6 – IT system evaluation and Chapter 7 – Work methodologies specific to each verified area.

3. Status of Action Measures Implementation Corresponding to ANI Strategy for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets (2016 – 2020)

National Integrity Council approved, by Resolution no. 4 of June 14, 2016, the "Strategy for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets (2016-2020)".

For the period January 1 – December 31, 2017 we have followed the status of the measures assumed in the Strategy for the prevention and sanctioning of conflicts of interest, incompatibilities and unjustified assets (2016-2020).

Following the tests performed for determining the degree of measures' implementation status corresponding to ANI Strategy for control and prevention regarding accumulation of assets, conflict of interest and incompatibilities, the following statistics resulted:

Total measures	Implemented	Partially implemented	Not implemented
56	34	16	6

Please refer to Appendix 3 for a detailed analysis of the progress related to the measures taken by the new strategy.

4. Remediation status for deficiencies identified during the verifications for the period 2009-2016

Following the tests performed to determine the extent to which the observations identified as a result of the 2009 - 2016 verifications were corrected, the statistics of the implementation status for the observations on 31 December 2017, are presented below:

Directorate/ Department	Total number deficiencies	Stage		
		Implemented	Partially implemented	Not implemented
Risk management process	1	1	-	-
Information Technology Department	11	2	6	3
Integrity Inspection	9	5	4	-
Internal Public Audit Department	1	1	-	0
Human Resources Department	3	1	-	2
Economic Directorate	1	1	-	-
Communication, Public Relations and Strategy Directorate	3	1	2	-
Systemic observations	1	-	-	1
Archive	1	-	-	1
Total	31	12	12	7

For details on the corrected / partially corrected observations, please refer to the IT System Evaluation chapter and the Working Methodologies chapter of each verified area.

5.IT System Evaluation

The IT system procedures consisted of evaluation of applications and processes that sustain their operation, as follows:

1. We evaluated the integrated Information System for the Management of Declarations of Assets and Interests (**SIMIDAI**), its functionalities and the related infrastructure, as well as the process of data recovery and the related risks, in order to assess the way in which the IT system responds to the necessities derived from the specific tasks ANI has to fulfil.
2. We have performed verifications on the SAP ERP IT system, designed for the Agency's support activities, as well as on the operating of the application's security controls of the application, the databases and operating systems.
3. We have performed verifications on the Prevent IT system and the operating of the application's security controls, as well as the databases and operating systems. The Prevent system has a preventive role in SEAP offences.

In order to test and evaluate the IT environment, we covered the following phases:

- Understanding ANI's IT system;
- Establish the evaluation criteria and develop the testing plan;
- Performing and documenting the tests;
- Defining the identified deficiencies

In order to understand ANI's IT system we attended interviews organized to present and discuss the system functionality with IT Department representatives and with the team that provides the services for designing, administration, analysis and development of the IT system on behalf of the external partner responsible for these services.

This report includes the factual findings from the verifications carried out on ANI's IT system and is based on:

- The information and documentation made available by the employees of the Information Technology Department;
- Analysis of the daily activities performed by the IT Department;
- Visiting and checking the locations where the hardware serving ANI's software and infrastructure is installed.

IT environment and management of IT systems security evaluation

We verified the manner in which IT systems architecture and structure answer the needs of their operation from the point of view of sufficient internal control implementation possibility.

The IT system verification comprised the following steps:

- Verification of the adequacy and operational effectiveness of IT system general controls;
- Review of the IT system;
- Perform a diagnosis of IT environment security.

Verifications of the IT general controls comprised the identification of the potential risks that might adversely affect the functioning of the application, as well as the evaluation of the control elements designed to mitigate these risks.

We verified the IT system internal control general framework, as well as the IT security standards and procedures implemented by ANI. The activities performed covered the following areas:

- Operating procedures regarding IT applications in use;
- IT environment security;
- Users management;
- Logical access management
- Physical access management
- Security updates and network security control measures;
- Business continuity plan;

- Backup process management for the IT systems;
- Change management policy regarding IT systems.

During the activities performed part of the evaluation engagement of SIMIDAI, SAP ERP and Prevent applications, we paid close attention to the evaluation of the:

- data recovery process and corresponding risks assessment;
- critical areas and data that must be recovered;
- documentation and recovery procedures;
- roles of the personnel involved in the data recovery process.

The Information Security Management System used by the Agency went through a successful re-certification process in 2016 according to ISO 27001:2013. Governed by the provisions of Standard ISO 27001:2013, ISMS offers better control to the Management on the information flow within the Agency and can provide a unitary management of the matters related to IT security through the active control of internal resources and processes.

Findings

Following the evaluation of the operating procedures and based on the methodology applied, the following deficiencies have been identified, which affect the following areas:

- Business continuity;
- Maintenance and support services provided by external suppliers
- Logical and physical security;
- Change management process

In addition, following the verifications performed, we found that the Agency lacks an entire array of competences necessary to manage the systems/technologies it is currently using. Consequently, continuity in managing and operating the IT systems depends on the services provided by external suppliers. During 2017, we noticed that for the first three months, support for managing and operating the IT systems was not provided based on a contractual relationship, the support contracts being signed late.

In conclusion, we found that, apart from two deficiencies identified in previous years, which were remediated, for the other nine, the Agency is still in the process of implementing corrective measures to fully eliminate the risks identified by the Deloitte team regarding the IT environment and management of the IT systems security.

6. Work Methodologies specific to each verified area

Following the evaluation of the activity performed during 2017, we noticed a continuation of management's efforts for processes improvement and for the efficiency of the activity performed in order to achieve the planned objectives.

Follow up the remediation of the observations identified for the period 2009-2016

The following systemic deficiencies below **have not been remedied**:

- *Employee training sessions on SAP use have not been conducted.*
- *Observations on the Strategy level for prevention and punishment of conflicts of interest, incompatibilities and unjustified assets (2016 - 2020):*
 - *Indicators for tracking measures are not SMART and in some cases they are incomplete*
 - *deadlines are not correlated with the objective measure*
 - *Not all risks have been identified*

New observations identified during the verifications for 2017 period

Following the verifications performed and based upon applying the methodology, we have identified the following **observations** at the Integrity Plan level of the Agency:

- *ANI's integrity plan for implementing SNA 2016-2020 includes evaluation indicators for assessing the degree of implementation of the measures defined for achieving objectives, but they are not measurable in all cases or reported relative to a reference system in order to allow an objective evaluation*
- *At the time of our verifications, ANI has not yet performed a precise monitoring of the degree of implementation for all measures defined in the Integrity Plan. A descriptive report has been sent to the Ministry of Justice regarding ANI activating for implementing the objectives set up through the National Anticorruption Strategy -2017" but this only includes a synthetic presentation of the implementation status for the measures 1.1.1, 1.2.1, 3.1.1, 3.1.2, 3.2.2 and 3.4.2.*
- *The particular responsibilities of the people appointed for SNA implementation are not presented into a formalized work procedure.*

6.1. ANI Management

We have analyzed the responsibilities of ANI President and Vice-President as stated in the ANI Internal Organization Manual approved by ANI President through Order no 7962/04.05.2016 regarding the reorganization of ANI's structure.

We noticed an increase in the communication degree at Agency management level through weekly management meetings that facilitate the process of identification of possible cross-functional issues and best solutions agreed upon.

President, Vice-president and General Secretary

ANI's leadership fulfill their responsibilities based on the provisions of the Law 144/2007, the Law no 176/2010 regarding the integrity and dignity in the exercise of public functions for modifying and completing Law no 144/2007 on the establishment, organization and functioning of ANI and to amend and supplement other regulations and the ROF.

The position of Vice-President was occupied following a competition finalized in November 2017, the result of which was confirmed by CNI Decision no. 7 / 01.11.2017

ANI's General Secretary is the person designated to coordinate and monitor ANI's Integrity Plan for the implementation of the National Anticorruption Strategy 2016-2020, approved by ANI's President Order 6476 / 12.05.2017

Regarding the status of implementing the action measures corresponding to the Strategy for preventing and sanctioning conflicts of interests, incompatibilities and unjustified assets (2016 - 2020), 89% of the measures defined for achieving the objectives have been either implemented or partially implemented, ANI's leadership being actively implicated in this process.

In 2017, no discrepancies have been identified between the practical activity and the ROF provisions regarding the positions of President, Vice-president and General Secretary.

6.2. Integrity Inspection

During 2017, the activity of the Integrity Inspection was carried out under the provisions of Law no. 176/2010 on integrity in the exercise of public functions and dignities, amending and completing the Law no. 144/2007 on the establishment, organization and functioning of ANI, as well as for the modification and completion of other normative acts, published in MO no. 621 / 02.09.2010, as well as under the provisions of Law no. 184/2016 regarding the establishment of a mechanism to prevent conflicts of interest in the procedure for awarding public procurement contracts.

In order to evaluate the managerial actions performed within the Integrity Inspection, a sample was selected based on the following procedure agreed upon with ANI's management:

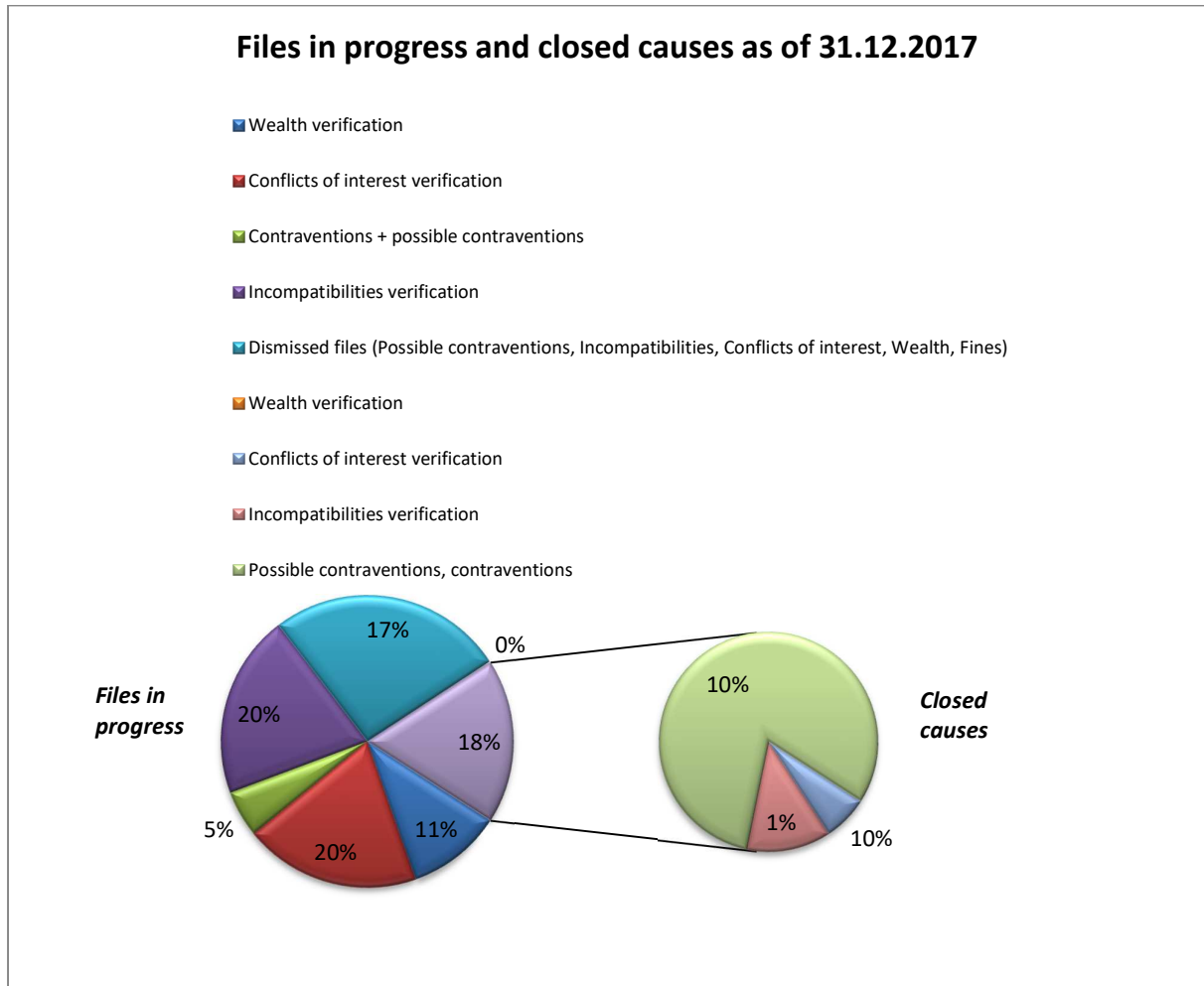
- a) we requested the statistics regarding the number of causes verified during 2017, on the following structure: files settled and files in progress, files dismissed and files re-distributed as at December 31, 2017. In respect of finalized files, we have requested their distribution considering the following sub-categories: wealth, criminal conflict, administrative conflict, incompatibility, money laundering, fine. As to the files in progress, we have requested their distribution considering the following sub-categories: unjustified assets, conflict of interest, sanctions, incompatibility and possible contravention.
- b) based on the statistics we determined the size of the sample of causes to be analyzed.
- c) we requested the list of causes subject to ANI evaluation procedures during 2017.
- d) based on the list of causes we randomly selected the sample of files subject to the analysis

Following the procedure above, a sample of 147 cases (145 unique cases) has been identified, as follows:

Cases closed by ANI in 2017 (January 1 – December 31) ¹	Sample size	
Verification of assets	9	2
Verification of conflict of interest	84	15

¹This data is based on the statistics provided by the Integrity Inspection during the project roll-out.

Verification of incompatibilities	157	15
Closed cases (Possible contraventions, Incompatibilities, Conflicts of interest, wealth, fines)	1833	25
Number of cases in progress as at December 31 2017		
Verification of assets	729	25
Verification of conflict of interest	1352	25
Verification of incompatibilities	1408	25
Other cases (possible contraventions, contraventions in progress)	358	15



The methodology for testing the sample was issued based on the understanding and evaluation of operating procedures. We analyzed the content of the operating procedures to identify the activities within the Integrity Inspection and to determine the relevant criteria to stratify the sample for testing, based on department specific activities.

Thus, we verified the documents included in the files according to the steps determined based on the operating procedures regarding the activities of verification the assets, conflict of interest and incompatibilities performed during 2017 by integrity inspectors.

Aspects regarding the activity of the Integrity Inspection

Aspects noted from the analysis of the sample of cases regarding the verification of wealth

Based on the sampling method described above we determined 31 cases regarding the verification of assets out of which:

- 17 cases derived from ANI ex officio notification, and
- 14 cases derived from a notification made by individuals or legal entities.

Aspects noted from the analysis of the sample of cases regarding the verification of conflicts of interest

Based on the sampling method described above, we determined 47 cases regarding the verification of conflict of interest out of which:

- 16 cases derived from ANI ex officio notification, and
- 31 cases derived from a notification submitted by individuals or legal entities.

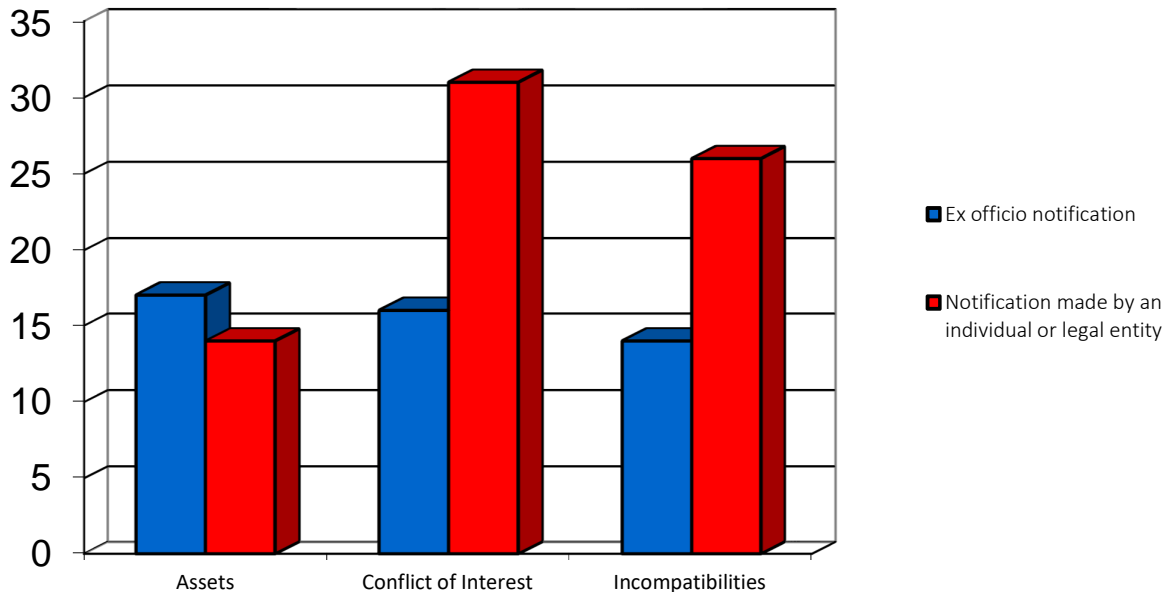
Aspects noted from the analysis of the sample of cases regarding the verification of incompatibilities

Based on the sampling method described above we determined 40 cases regarding the verification of incompatibilities out of which:

- 14 cases derived from ANI's ex officio notification, and
- 26 cases derived from a notification made by individuals or legal entities.

Aspects noted from the analysis of the sample of cases regarding compliance with legal requirements related to timely completion and submission of wealth and interest statements

Based on the sampling method described above, we determined 25 regarding compliance with legal requirements related to timely completion and submission of wealth and interests statements.



The activity of the Integrity Inspection is standardized and conducted based on the specific operating procedures elaborated in conformity with the Order no. 400/12 June 2015 for approval of the Code of internal control / management of public entities.

Follow up the remediation of the observations identified for the period 2009-2016

We found that the following deficiencies **were partially remedied**:

- *Files for which the procedural documents have not been issued for more than 30 days, in terms of preparing the evaluation report (where the information existed) or submitting other information requests;*

Following the examination of a sample of files, we have identified cases in which, in 2017 no procedural documents have been issued for periods longer than 30 days.

- *The reminders were not drawn up and sent to the institutions that failed to respond to ANI's initial letters in the procedure term of 30 days.*

Following the examination of a sample of files, we have identified 2 cases in which the integrity inspectors didn't issue and send reminders to the institutions that failed to respond to ANI's initial letter in the 30 days term;

- *The result of the evaluation is not communicated in a unitary manner to the interested parties, as specified in the procedure.*

Following the tests performed, we noticed that in two cases the result of the evaluation report was not communicated to the petitioner within 5 days, as specified in the operational procedure

- *Failure to prepare and submit claims to courts for fining the institutions, in accordance to the provisions of art. 27, para. 1 rep. to art. 15 para. 2, Law 176 / 2010, corresponding to the cases in which institutions did not reply to second requests from ANI within 30 days.*

In the sample selected for testing, we have identified a case in which an institution replied to the reminder after the 30 days deadline and the inspectors did not issue and submit claims to courts for fining the institution.

The following observations were **remedied**:

- *Failure to submit on time a letter to the ANAF regarding the unpaid minutes ascertaining the minor offense, to register the debt.*

In the selected sample, we did not identify cases in which the letter to ANAF regarding the unpaid minutes ascertaining the minor offense, to register the debt, was not sent.

- *The address to the petitioner regarding the start of the assessment procedure was not sent within 30 days after receiving the notification, and in one case, it was not sent altogether.*

In the analyzed files for which the notifications were received in 2017, we have not identified cases in which the 30 day term for communicating to the petitioner the address regarding the start of the evaluation procedure was not sent.

- *The Note regarding the result of consulting the database from ANI's information system was not drafted.*

Procedure "POO2/II Applying contravention sanctions for..." indicates the optional nature of the Note regarding the result of consulting ANI's Information System database, considering the fact that the information regarding declarations of assets and interests can be obtained from other sources (e.g.: work place)

- *Phone call minutes after communicating with the person assessed or petitioner were not prepared.*

In the analyzed files, we have not identified cases in which phone calls that took place were not recorded in phone calls minutes.

- *The proposal to sanction report was not prepared which results in prescribing the offense.*

In the analyzed files we have not identified cases in which the proposal to sanction report was not drafted.

New observations identified during the verifications for 2017 period

Following the evaluation of the operating procedures and based upon the methodology the **following deficiency** has been identified at the level of Integrity Inspection in **2017**:

- *We have identified a file for which the Note regarding the evaluation and prescription period was not drafted*

Analysis and Prevention Department

During 2017, the Analysis and Prevention Department functioned under the provisions of Law no. 184/2016 regarding the establishment of a prevention mechanism for conflicts of interest in the procedure of awarding public procurement contracts.

In view of evaluating the managerial actions within the Analysis and Prevention Department, a sample was selected based on the following procedure agreed upon with ANI's management:

- a) a request was made for the statistics regarding all public procurement procedures published in SEAP, that were automatically transmitted to Prevent system in 2017, which were the subject of verification by integrity inspectors of the Analysis and Prevention Department, with the following structure: type of procurement procedure, date of offers submission, number of lots, source of financing, date of completion of the Identity Form, type of awarding contract, type of participation notice, the status of the public procurement procedure
- b) based on the statistics the size of the sample which would be analyzed was determined
- c) the sample of procedures to be analyzed was randomly selected, following the principle "procedure = lot".

Based on the methodology presented above, a sample of 25 public procurement procedures emerged, corresponding to 42,993 public procurement procedures (lots) which contributed to the verification of the Analysis and Prevention Department in 2017.

The sample testing methodology was developed as a result of the understanding and evaluation of the operational procedures, of Law no. 184/2016 regarding the establishment of a mechanism to prevent the conflict of interest in the procedure for the award of public procurement contracts and the functionality of the PREVENT system.

We have analyzed the content of the operational procedures regarding the verification of procedures initiated through the public system of public procurement in view of prevent conflicts of interest and other suspicions of irregularities identified in the procedure of awarding public procurement contracts in order to understand the actions/processes at the level of the Analysis and Prevention Department for determining the relevant criteria for stratifying the sampling base, from the functionality of the PREVENT system perspective.

Based on the analysis of the functionality and efficiency of the PREVENT system, as well as compliance with the process of verifying the procedures initiated in SEAP, in order to prevent conflicts of interest and other suspicions identified in the procedure of awarding public procurement contracts, for the selected sample, the following observations have resulted:

- *The algorithm for calculating the score of possible conflicts of interest established automatically by the PREVENT system as a result of consulting the databases of ONRC, DEPABD and SEAP, is not visible in order to be evaluated from the perspective of the degree of adequacy.*
- *The PREVENT system does not allow users to generate monitoring reports of the activity of the Analysis and Prevention Department. In 2017, the monitoring was only performed from quantitative and not qualitative point of view.*
- *Instead of taking over the status of the procedure from SEAP, The PREVENT system takes over the status of the procedure from the Integrity Form that is manually completed by the Contracting Authority.*
- *The ROF does not include specific responsibilities of the Analysis and Prevention Department regarding the activities for preventing conflicts of interest and other suspicions of irregularities identified in the procedure for awarding public procurement contracts.*
- *We have identified the existence of public procurement procedures of the category "Negotiation without participation announcement" which were allocated for verification to the integrity inspectors through the PREVENT system, even though the legal provisions indicate that only the public procurement procedures carried out through SEAP are Subject to ex-ante checks, for which the Contracting Authorities have the obligation to draft the Integrity Form. Other procedures received for analysis refer to acquisitions performed by private companies. Although this type of procedures are not analyzed by the integrity inspectors through Prevent, this situation might lead to an inefficient use of the department's resources.*
- *The PREVENT system cannot display a history of the score of possible conflicts of interest from the moment of allocating the procurement procedure until the finalization of the procurement procedure.*

- *The PREVENT system interface does not have enabled the option of archiving the procedures of awarded public acquisitions, which makes it difficult to use the system.*
- *The minutes for telephone conversations, through which integrity inspectors offer assistance to the representatives of contracting authorities on filling in and efficient use of the Integrity Form, are not prepared any time the contracting authorities request the helpdesk services offered by the Analysis and Prevention Department, but only in case, following discussions, the integrity inspectors identify certain clues of possible conflicts of interest.*
- *The monthly reports regarding the statistics of the procurement procedures managed through PREVENT sent to the Communication, Public Relations and Strategy Directorate are not prepared monthly, as specified in the procedure, they are sent only when requested by the Communication, Public Relations and Strategy Directorate.*

6.3. Internal Public Audit Department

We analyzed the responsibilities within ANI for the Internal Public Audit Department (hereinafter "CAPI") in accordance with the ROF provisions and the "Methodological Norms regarding the Exertion of the Internal Public Audit Activity within ANI" and the operating procedures that documents the CAPI activity.

The structure activity is standardized and based on specific operating procedures developed in accordance with the OMPF No. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

The analysis was focused on the compliance of the ROF, internal norms and operating procedures with the applicable laws.

We organized a number of interviews with this department's representative in order to assess the compliance of the practical activity with the procedures' provisions and we performed a number of detailed tests on the following processes within CAPI:

- Preparation of the internal public audit annual plan;
- Preparation of the strategic internal public audit plan;
- Preparation of the quality assurance and improvement program;
- Elaborating the annual report over the internal public audit activity;
- Performing the internal audit engagements;
- Assessment of the individual professional performances;
- The continuous vocational training of internal auditors.

In order to assess the management's actions within the Internal Public Audit Department, we selected two audit engagements from the "Annual public audit plan for 2017": "Control of A.N.I's internal integrity" and „Evaluation of the Communication, Public Relations and Registry Activities". To this effect, we obtained and assessed the documentation applicable for each process in respect to the following criteria: frequency, compliance with the legal provisions, authorization and compliance with the legal terms.

Based on the methodology applied and following the evaluation of the operating procedures, there were no deficiencies identified regarding the activity performed at the level of Internal Public Audit Compartment.

Follow up of the remediation of the observations identified for the period 2009-2016

The following deficiencies **has not been remedied**:

- *Attesting internal auditors*

The following deficiency was **remedied**:

- *The current number of two auditors proves to be insufficient to cover both current requirements and the need for audit and system performance.*

Throughout 2017, although the internal audit staff numbers remained unchanged (2 internal auditors), the internal audit activity became more efficient, which allowed the internal auditors to carry on performance audit and systemic audit engagements.

New observations identified during the verifications for 2017 period

Based on the methodology applied and following the evaluation of the operating procedures, the following observation was identified regarding the activity performed at the level of **CAPI**:

- *According to the "Methodological norms regarding the internal public audit activity within ANI" and the procedure "Evaluation of the individual professional performances" auditors must attend at least 15 days of professional training per year. In 2017, internal auditors completed 10 and 7 days of formal training through formal courses.*

6.4. Legal, Public Relations and Communication General Directorate

The activity of the Legal, Public Relations and Communication General Directorate is standardized and runs based on specific operating procedures, drafted in accordance with the provisions of Order no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

In order to analyze the compliance of the practical activity of this directorate with the provisions of the ROF, we interviewed the Manager of the Legal, Public Relations and Communication General Directorate, who identified the risks and areas of activity that could be improved in order to increase the activity's efficiency.

Legal department

We have analyzed the responsibilities of the Legal, Public Relations and Communication General Directorate (hereinafter "DGJRPC") stated in the ROF approved by Order of ANI President no 1.288/01.02.2017 regarding the amendment and the improvement of ANI's ROF, approved by the President of the agency through Order no. 7962/04.05.2016. The operational procedures were updated/ modified in 2017.

Legal activity - representation in cases pending before the courts and Commissions for wealth investigation near the Courts of Appeal

According to the information provided by the DGJRPC management, we understood that in 2017, 73% of the court cases were successful.

The directorate consists of nine employees: seven senior legal advisers (including the DGJRPC Director), three senior legal adviser and one assistant legal adviser, as well as two senior civil servants.

Regarding the carried out activity, it is mostly contentious. Taken into consideration are the complaints regarding the evaluation reports, reports drafted by inspectors - incompatibility / conflict of interest that may be challenged at the litigation court, those concerning the notification of the prosecution bodies if the Inspector of Integrity considers that there are indications regarding certain criminal offenses or those that are drawn up in the matter of administrative confiscation.

As practice at the Directorate level, without being yet transposed in operational procedures, legal advisors always represent ANI in cases pending before the High Court of Cassation and Justice, Court of Appeal, or in cases that may set a precedent the judicial practice. For all other cases, ANI is applying for judgment by default, submitting written observations. This practice is not formalized in a procedure.

The situation of the hearings and uploading to legal counsel during January 2017 - December 2017 is as follows:

- 374 new registered cases at the DGJRPC in 2017;
- 1462 pending cases at the end of March 2018;
- 200 court representation on monthly average, 2-3 daily court representation, both at the High Court of Cassation and Justice and the Court of Appeal from Bucharest are 2-3 daily cases;
- 30 cases on monthly average / legal adviser, and about 244 pending cases/legal adviser.

According to the operational procedure PO 01/DGJRPC, Drafting of documents and National Integrity Agency representation before the courts, defense / greeting shall be made in writing and approved by the Chief DGJRPC. Each file is assigned to a responsible, but the hearings may be attended by another legal counsel chosen by the Director in accordance with criteria such as: experience in specific case, the complexity of the case, oratorical qualities and so on. This practice is formalized in a procedure.

In 2017, Legal advisers attended English language trainings held by the British Council and seminars concerning Extrajudicial accounting expertise organized by CECCAR. We were informed that although proposals were submitted to the Human Resources Department on courses that need to be followed by the legal advisors, these have not been approved because of financial reasons.

In respect to the review of possible conflicts of interest, according to the status of civil servants, we were informed that that in 2017 the operational procedure PO 01 regarding the "Drafting of acts and the representation of the National Integrity Agency in courts" was updated. The following provision was added: "The legal counselor requires the disclosure of the documents on which the contested appraisal report or any other administrative act has been challenged in order to secure the defense in writing. In accordance with the provisions of Law No 134/2010 on the Code of Civil Procedure, in court, and in justified cases, the legal counselor is obliged to apply the provisions of Article 79 of Law 161/2003". Moreover, we were informed that throughout 2017 there were no cases of legal advisors abstaining with regards to compliance with the provisions of the Civil Servants' Statute concerning the prevention of conflicts of interest in the management of the files that were assigned to them or of the files in which they represented The National Integrity Agency in the courts over the year in question.

During the audit work carried out, we selected a sample of 15 files out of more than 320 files pending before the courts of law and before the Wealth Investigation Commissions attached to the Courts of Appeal in 2017, in order to test the following procedural aspects:

- The manner of recording and assigning the files on the dockets of the courts of law;
- Presentation or preparation, within the specific timelines of procedural documents pertaining to the case's stage in court, by the legal consultant who was assigned the case to represent ANI;
- Compliance with DGJRPC internal procedures.

Other activities in responsibility of DGJRPC

Among the responsibilities of legal advisers are also answers made under Law 544/2001, Ordinance 27/2002, issuance of points of view required by the Department for Relations with the Parliament or / and Ministry of Justice, endorsing the legitimacy of ANI internal documents (Explanatory note for procurement, contract, addendums, committees), participation as members of disciplinary commissions and dissemination of relevant information on court cases /uniform approach to integrity inspectors.

Follow up of the remediation of the observations identified for the period 2009-2016

The following deficiency **has been remedied**:

- *There is no transposition into DGJRPC internal rules of a tool for monitoring cases of abstention when conflicts of interest arise in allocated cases.*

In 2017 the operational procedure PO 01 regarding issuance of documents and representing ANI in Court was updated with the provision according to which, the Legal Counselor requires communication of the documents that were basis for the evaluation report or any document challenged in order to ensure written defense in accordance with the law 134/2010 regarding the Civil code and, in justified situations is obliged to apply the dispositions of art 79 of law 161/2003.

The following deficiency **has been partially remedied**:

- *Number of legal advisors is insufficient for the workload.*

So far, no additional legal adviser positions have been made available in order to reduce the workload of the existing staff. We were informed that during 2017, two contests were organized, in February and July, with nine candidates, but none of the nine fulfilled the conditions for filling the positions. Based on the discussions with the Director of DGJRPC, we understood that in 2018 a Memorandum was submitted to the

Ministry of Finance regarding the organization of a contest for two positions. The request did not receive a favorable opinion, and the procedure is currently blocked.

New observations identified during the verifications for 2017 period

Following the evaluation of the operational procedures and after applying our methodology, the following **finding** resulted in 2017 for the **Legal department**:

- *We noticed inconsistencies between the work carried out and the provisions of PO 07 regarding the communication of the Procedural acts to the Integrity Inspection concerning the deadline for transmission of the information concerning the appeal and the communication of the Civil Decisions.*

Communication, Public Relations and Strategy Directorate

The activity of the Directorate is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

We have analyzed the responsibilities of the Communication, Public Relations and Strategy Directorate (hereinafter "DCRPS") within ANI both for compliance with the ROF and the operating procedures. The focus of the analysis was the conformity of the operating procedures valid over 2017 with ROF provisions and the applicable legislation.

In order to conclude on the conformity of the practical activity with the procedural provisions, we organized a number of interviews with the DCRPS representative and we assessed through detailed tests the following processes:

- preparing the answers to the requests received based on the Law no. 544/2001 regarding the free access to public interest information- **systemic process**;
- monitoring the press publications;
- reporting to Justice Ministry on the implementation status of the measures belonging to ANI for the fulfilment of MCV (Cooperation and Verification Mechanism) Benchmarks;
- Implementing the measures for ANI's Strategy on combating and prevention of unjustified assets, conflict of interest and incompatibility Action Plan implementation.

For the detail tests required, we selected from the "Registry of applications received in 2017" a sample of 25 public information petitions and, in order to test the media monitoring procedure, we selected 15 days from the year in scope.

To this effect, we obtained and assessed the documentation applicable to each process in respect to the frequency, compliance with the legal conditions, authorization, adherence to legal terms, etc.

Regarding the implementation of the National Anticorruption Strategy at the level of ANI, we examined the Institutions Integrity Plan and evaluated the process of monitoring its implementation.

Follow up of the remediation of the observations identified for the period 2009-2016

The following systemic observation **was partially remedied**:

- *Replying to requests for information of public interest exceed the maximum term of 30 days from filing the request.*

All requests are registered at the Registrar's office in separate registers depending on the channel through which they were received (electronically and by mail). The Chief of Cabinet disseminates the requests to the responsible directorates. Internal deadlines have been set for the transmission of responses through the procedure PO01/DCRPS - Issuing responses to the requests based on Law 544/2001, but the replies were not submitted within the legal framework in all cases.

New observations identified during the verifications for 2017 period

Following the evaluation of operational procedures and based on the methodology, for the **Communication, Public Relations and Strategy Directorate** the following observations **were identified**:

Systemic observation

- *Evidence of Public Interest Information Requests is not transparent to ensure the completeness of reporting on this issue.*

Observation specific to DCRPS activity

- *Procedure PO 04 / D.C.R.P.S. The organization of the protocol activities for ANI`s management includes references to the Communication, Strategies, Public Relations Department, while in the organization chart this structure is called the Communication, Public Relations and Strategy Directorate.*

6.5. Human Resources Department

We have analyzed the responsibilities of the Human Resources Department (hereinafter "SRU") within ANI, in accordance with ROF provisions and the operating procedures that document SRU activity. The analysis was focused on the conformity of the valid operating procedures during 2017 with provisions of ROF and applicable legislation.

The activity of this structure is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

We organized a number of interviews with the HR Department representative to analyze the conformity of the practical activity with the procedural provisions and we assessed through detailed tests the following processes:

- maintaining the professional file, for both public servants and contractual personnel;
- organizing contests for employment and promotion within ANI;
- receiving, recording, tracking the declarations of assets and interests for the personnel of ANI;
- preparation, certification and the circuit of the timesheets, including inventory of the paid, medical and unpaid leaves etc.;
- professional training – training plan for 2017 and evaluation of training activities;
- confirming the permanent positions for debutant personnel during 2017;
- evaluating the performance of ANI personnel;
- preparation of the work chart of public functions plan for the year 2017;
- promotion operating procedure;
- procedure for terminating work relations;
- monitoring the compliance of ANI personnel with the conduct norms;
- disciplinary Commission Activity at ANI level;
- Ethics Counselor Activity.

For this department we used two methods of testing, based on the nature of the assessed activity:

1. Test an operation from initiation to finalization;
2. Stratify the population and test for each segment an operation from initiation to finalization.

To conduct the tests on the activity of the Human Resources Department, we have requested on a sample basis the documentation for the following selections:

- from "List of contests organized by ANI in 2017", we selected 2 contests;
- from "Contractual personnel of ANI in 2017", we selected 5 professional files;
- from "List of new-comers in 2017 and fully-certified personnel in 2017", we selected 2 personnel file;

- from "List of labor relationships termination", we selected 2 files;
- from "Nominal table of ANI personnel who attended vocational training courses/seminars in 2017", we selected 15 persons who attended such courses/seminars;
- from "Record of public servants", we selected 15 professional files;
- for June and December 2017, we requested pockets, salary states and all supporting documents for them.

To this effect, we obtained and assessed the applicable documentation for each process in respect to the periodicity, compliance with legal conditions, authorization, adherence to legal terms, and errors handling.

Furthermore, following the interviews held with the department's representatives and ANI management, as well as from the analysis performed over HR Department's activity during 2017, we noted the fact that the personnel from this department has a good professional background adequate to the complexity of the tasks to be performed.

Also, we performed an analysis of the responsibilities as per the job descriptions and noted that these are differentiated according to the professional position held and with the provisions stipulated in the national legal framework specific to each specialization, existing distinct responsibilities for the coordinators of the structures, which leads to an improvement of the managerial control function.

Follow up of the remediation of the observations identified for the period 2009-2016

The following deficiency **has been remedied:**

- *OP 24/SRU – Organizing and conducting the recruitment contest/examination for public positions within ANI" does not include references concerning the documents required to be submitted by the applicants in order to participate in the contest. We also identified inconsistencies with the legislative provisions regarding the method for calculating the final score.*

The procedure "PO 24 / SRU - Organizing and conducting the recruitment contest/examination for public positions within ANI" was revised in 2017. Thus, in the revised edition of the procedure, the documents required to be submitted by competitors to participate in the contest were explicitly mentioned. Also, the provisions on the method for calculating the final score were updated in accordance with GD no. 611/2008 and institution's practice.

The following deficiency **has not been remedied:**

- *Evaluation reports of the selected contractual staff do not include the training courses attended during the evaluation period.*

Following the analysis of the evaluation reports for five employees of the contract staff category, we noticed that two people attended professional training courses during the assessed period. In one of the two cases mentioned above, the evaluation report does not contain a heading on the courses followed. For the second case, the evaluation report was not made available to the audit team, and was not signed by the time we performed the audit.

New observations identified during the verifications for 2017 period

- *Individual performance reports for 2017 were not available, as they were not approved by the time of the verification process, thus not in conformity with procedural provisions. In addition, there are reports counter-signed after the deadline for completing the performance evaluation process*
- *The documentation drawn up related to the termination of the work relationship is incomplete, thus not in conformity with the procedural and legal provisions.*

Labor Protection Compartment

We assessed the overall compliance of the operating procedures valid for 2017 with the ROF provisions and the applicable legislation. Furthermore we organized an interview with the representative of the Labor

Protection Department (hereinafter "CPM") in order to draw conclusions on the compliance level of the practical activity with the provisions of the operating procedures.

The activity of the Human Resources Department is standardized and conducted based on the specific operational conditions elaborated in conformity with the OMFP no. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

New observation identified during the verifications for 2017 period

Following the evaluation of the operational procedures and after applying our methodology, the following **finding** resulted in 2017 for the **Labor Protection Compartment**:

- Related to the periodic training of health and safety at the workplace, we found that in 3 out of the 15 cases selected, the 6-month time interval during which the periodic health and safety training needed to be held (as per "PO 04 - Activity periodic training in occupational safety and health ") was not followed.

6.6. Economics General Directorate

We analyzed and evaluated the compliance of the operational procedures applicable for 2017 with the ROF and applicable legislation. We also conducted an interview with the Director of the Economic DG (hereinafter "DGE") to conclude on the compliance of the practical work with the provisions of the operational procedures.

The structure activity is standardized and based on specific operating procedures developed in accordance with the OMPF No. 400/June 12, 2015 regarding the Internal/Managerial Control Code for public entities.

Financial and Accounting Department (SFC) – Accounting Compartment

In order to assess the managerial actions within Economic Directorate we performed detailed test on the following processes:

- Procedure for establishing the necessary credits for 2017;
- Procedure for drafting the expenses budget;
- Implementing the investment project for 2017;
- Expense hiring, liquidation, authorization and payment processes
- Cash register;
- Internal preventive financial control;
- Monitoring the expenses of personnel;
- Asset count.

For the detail and control tests, we selected June and December 2017 from the "Cash register".

To this effect, we obtained and assessed the applicable documentation for each process in respect to the periodicity, compliance with the legal conditions, authorization, adherence to legal terms and errors management.

Follow up the remediation of the observations identified for the period 2009-2016

The following deficiency **has been remedied**.

- *Improper use of the names of the efficiency indicators and results reported in the performance report regarding program execution submitted to the Ministry of Public Finance.*

Up until the date of our verifications, the names of the reported efficiency and result indicators were not changed. A footnote detailing the data used to calculate the indicator value was although added.

Public Procurement, Investments and Patrimony Management Compartment – BAPIGP

We have analyzed the responsibilities of the Public Procurement, Investments and Patrimony Management Compartment (hereinafter "BAPIGP") in accordance with ROF provisions and operating procedures that document the activity of BAPIGP. The analysis focused on the compliance of the operating procedures valid during 2017 with ROF provisions and the applicable legislation.

To conclude on the conformity of the practical activity with the procedural provisions we organized a number of interviews with BAPIGP representative and we assessed through detailed tests the public procurement process.

We have obtained the list of public procurements started in 2017. Following the analysis of this status, we noted the fact that during 2017 there were purchased goods, services and assignments through the processes of call for tenders, open tender, direct purchase and subsequent contracts.

For the necessary detail tests, we selected 15 direct purchases, 2 simplified purchase procedures, and 2 subsequent contract allotments from the "2017 Procurement List".

The evaluation of the purchases included in the sample aimed the conformity of the activities performed with the operating procedure for direct acquisition, valid during 2017.

New observation identified during the verifications for 2017 period

Following the evaluation of the operational procedures and after applying our methodology, the following **finding** resulted in 2017 for the **Public Procurement, Investments and Patrimony Management Compartment- BAPIGP**:

- *In the planning process of the procurement procedure for "SAP Prevent Application User Technical Assistance Services", the service delivery period was erroneously determined. This influenced the estimated value of the procurement procedure and implicitly the amount of the participation guarantee and the minimum value for meeting the requirements of the "qualification and selection" criteria established by the beneficiary.*
- *The assignment of two subsequent contracts was not published in SEAP.*
- *Within the framework of the contracting strategy as well as within the documentation regarding the assignment of help services for the SAP PREVENT IT application, references to the provisions of Order no. 509/2011 (which is no longer applicable) are included. These references relate to the formulation and establishment of qualification and selection criteria.*

In August 2016, a responsible person for ANI's archiving issues was appointed through order no. 13011/01.08.2016.

The assigned person holds a participation certificate no. 002/28.09.2016 at the Seminar "Electronic archiving and classic storage of documents in the context of last legislative changes in Archives" which was held from 27 to 28 September 2016.

At this seminar attended at least one person from each Directorate/Department and Office within the institution, person who was later appointed responsible for archiving / filing documents according to the legislation and the archive nomenclature.

Currently, the document archiving is made in accordance with the working methodology for physical archiving and electronic document conversion having as base the procedures of the company contracted for archiving. Following the last contract signed in 2016, will be archived both records of inspections and documents for other departments. In 2016 were archived all assets and interests statements received and completed files / classes from Integrity Inspection.

Through the address number nr.18424 / 17.11.2016 National Integrity Agency has submitted to the Romanian National Archives, National Central Historical Archives Service, Administrative and Cultural Office

Archives the Archives Nomenclature project. Archive nomenclature was approved through address no. 19638 / 13.12.2016.

Follow up of the remediation of the observations identified for the period 2009-2016

The following observation has **not been remedied**:

- *Files belonging to the auxiliary activities were not physically or electronically archived;*

Based on the analysis of the two subsequent contracts signed in 2017, in accordance with Appendix 1, we found that only the Statement of Wealth and Interests and the solved files by integrity inspectors within the Integrity Inspection Department and the support documentation within the institution framework.

6.7. The activity of the Commission for monitoring the internal control management system at ANI level

In order to ensure compliance with the SGG Order no. 400 / 2015, two permanent Commissions have been established at the ANI level. These two commissions have roles and responsibilities concerning the monitoring of the internal control system and management of risks identified as being associated with activities performed at the level of every functional structure within the institution. These two management bodies are: the SCM Monitoring Committee updated through the Presidents Order no. 17751 / 29.12.2017 (replacing Order 20060 / 20.12.2016) and the Risk Management Team, updated through the Presidents Order no. 17748 / 29.12.2017 (replacing Order 20058 / 20.12.2016).

In addition, ANI's procedure manual contains the system procedure regarding "Risk Management" for a unitary implementation of the principles to identify and control risks within all ANI functional structures. This manual contains provisions regarding:

- Implementation and development of Standard 15 from Order no. 400 – 12th of June 2015 regarding the approval of the Internal/Managerial Control Code for public entities;
- Risk management process at ANI's level;
- Setting and implementation of control actions/measures/devices.

In order to assess the adequacy and effectiveness of the Commission for monitoring the internal control management system at ANI's level, we analyzed the following aspects through the actions taken during 2017:

- The program for the development of the managerial internal control system;
- Regular meetings of the Commission for monitoring the internal managerial control system;
- Quarterly reporting to SGG regarding the implementation status of internal control management system;
- Unique Risks Registry prepared and revised at ANI level;
- The process of risks identification, reporting, assessment and monitoring;
- Existence of procedures / internal norms to formalize the risk management process;

In respect to the deficiencies identified during the previous years' engagements 2009-2016, we analyzed the way in which these were remedied.

Follow up of the remediation of the observations identified for the period 2009-2016

The following deficiency was **remedied**:

- *Standardization of the approach regarding risk treatment and correlation of activities performed in practice with the provisions of system procedure.*

Taking into account that in the last years about 27% of ANI employees have participated in risk management courses, especially those responsible for maintaining the Risk Register, and the risk assessment has increased, we consider this recommendation to be implemented.

New observation identified during the verifications for 2017 period

Following the evaluation of the operational procedures and applying our methodology, the following findings resulted for the Commission for monitoring the system of internal managerial control at ANI`s level for the year 2017:

- *No formalized management plan for sensitive functions has been drafted at ANI`s level as required by the PS 01 / SCM - Sensitive Function Management procedure.*
- *The internal auditor, who is a member of the Monitoring Committee for the internal management control system as a methodological coordinator, has developed various system procedures. This may have an impact on the auditor's internal independence in auditing those areas.*
- *Managing ANI`s public interest alerts is not carried out by an independent person. The role of the Ethics Adviser in recent years has been limited to ANI staff awareness of the Code of Conduct of the institution and has not been explicitly directed towards the legal framework governing SNA 2016-2020.*
- *The self-assessment questionnaires of the managerial internal control system are unequal completed by certain departments.*
- *The internal procedure governing the management of the ANI`s public interest alerts includes provisions that transpose the requirements of Law no. 571/2004 on the protection of personnel from public authorities, public institutions and other units reporting violations of the law and those of OG. no. 27/2002 regarding the activity of solving petitions.*

7. Use of the present report

This report is intended for the use of the management of ANI, for its communication to the National Council for Integrity and publication on ANI website. As such, the findings/deficiencies included in this report should not constitute a basis for any other type of action.

Our findings, as presented in this Report, are based upon the documentation made available to us by ANI.

We cannot exclude that we may have arrived to additional or different findings had further information and documentation been provided to us. We have relied upon the contents of such documentation and information provided to us, and we have assumed the documentation and information to be accurate and complete.

Should further information and/or documentation and/or data exist, which was not divulged or provided to us, or if any of the verbal statements or explanation are incorrect or misleading, any findings, interpretations or opinions contained herein may be incomplete and may have generated different results, which would require further or amended procedures outside of the applicability area of the present engagement.

The verification procedures performed by us were agreed between Deloitte and ANI. Deloitte provides no assurance regarding the sufficiency of these verification procedures performed for the purposes of ANI.

Had we performed additional specified procedures other matters might have come to our attention, which would have been reported to ANI.

This Report must not be construed as expressing opinions on matters of law, which are outside our area of expertise.

Deloitte has no responsibility to update the Report for events and circumstances occurring after December 31, 2017.

This Report or its contents should not be used, reproduced or circulated to any other party or for any other purpose than that for which it was intended, in whole or in part, without our prior written consent, except those provisions stipulated in the first paragraph. Furthermore, we do not accept responsibility to any third parties for any breach of this obligation or for any opinion expressed, or information included within this Report. The information within this Report is provided on the basis that the recipient will not rely upon it as the sole basis for any action or decision. This Report relates only to the items specified above and does not extend to any other financial information.

Some of the information included in this Report has been provided by external sources. We were unable to test the accuracy and completeness of the information obtained from these external sources in all the cases. Therefore, we take no responsibility and we do not provide any assurance upon the accuracy and completeness of the information provided by these external sources.

This report refers only to the audit of ANI's management quality for the year 2017 conducted in accordance with the provisions of standard ISRS 4400, as defined in the specifications.

APPENDIX 1 List of procedures analyzed

Operating procedure
<i>Integrity Inspection Department</i>
PO 01/II – Activity of checking the declarations of assets and conflict of interest received from ANI Registry
PO 02/II – Apply contravention sanctions for: I. Not submitting DA/DI within the timeframe stipulated under the law; II. Not submitting amended DA/DI within the timeframe stipulated under the law; III. Not stating, in the declaration of assets, the amount of income obtained or not stating them with cross reference to other documents; IV. Not fulfilling legal obligations by the persons responsible with the implementation of provisions regarding the declarations of assets and conflict of interest; VI. Not applying disciplinary sanctions or not contesting suspension of public function, as appropriate, when the evaluation report remains final
PO 03/II – Activity of evaluation of declarations of assets, of data and information regarding existing assets, as well as of patrimonial changes appeared existing in the exercise of public functions or dignity
PO 04/II – Evaluation of compliance with legal provisions regarding conflict of interest in the exercise of public functions or dignity
PO 05/II – Checking compliance with legal provisions regarding incompatibility regime in the exercise of mandates or public functions or dignity
PO 06/II – How to fill in the declarations of assets and interests
PO 07/II – Redistribution of the works assigned to the integrity inspectors, in conformity with article 9 paragraph 2 of Law no 176/01.09.2010
PO 08/II Execution of extrajudicial expertise with the agreement of the person whose assets are subject to evaluation or in case the person whose assets are subject to evaluation does not agree with the execution of the expertise
PO 09/II – Taking action in ascertain absolute nullity of legal or administrative acts concluded infringing legal obligations regarding conflict of interest by the person subject to evaluation
PO 10/II – The documents flow between Integrity Inspection and Legal, Public Relations and Communication Directorate
PO 11/II – Random distribution of causes in conformity with article 9 paragraph 1 of Law no 176/2010
PO 12/II – Receiving, Collecting, Centralizing and Processing the Declarations of assets and Interests by the Integrity Inspectors of the General Registry Office and Integrity Inspection, in compliance with article 10 paragraph 1 of the Law no. 176/2010
PO 13/II – Settlement of claims
PO 14/II – Supervision of integrity inspector activity
PO 15/II – Analysis of the procedures initiated through the public procurement system in order to prevent the conflict of interest and other suspicions of irregularities found in the award procedure of public procurement contracts
PO 16/II – Assessment of compliance with legal provisions on conflict of interest in public procurement procedures conducted through SEAP by local public authorities
PO 17/II – Communication of irregularities detected from the analysis of data and information in the PREVENTION system
<i>Human Resources Department</i>

Operating procedure
PO 01/SRU – Evaluation of public servants individual professional performance
PO 02/SRU – Appointment in a vacant public position
PO 03/SRU – Completion of the registry of contractual employees
PO 04/SRU – Organization of the contest / examination for occupying the position of integrity inspector
PO 05/SRU – Organization of the contest for occupying a contractual position within ANI
PO 06/SRU – Confirmation on the job of entry-level employee
PO 07/SRU – Scheduling and attribution of vacations for ANI personnel
PO 08/SRU – Delegation of work tasks within ANI
PO 09/SRU – Drafting, approval and submission of collective timesheets
PO 10/SRU – Communication of ANI Internal Regulation to employees
PO 11/SRU – Promotion of public servants
PO 12/SRU – Drafting the Annual Plan of Professional Training and of the plan of measures for professional development of ANI personnel
PO 13/SRU – Registering and recording of medical certificates within ANI
PO 14/SRU – Drafting and approval of ANI functions list
PO 15/SRU – Drafting and maintenance of public servant professional file
PO 16/SRU – Fulfilling the legal obligations regarding declarations of assets and conflict of interest by ANI personnel
PO 17/SRU – Drafting and updating job descriptions
PO 18/SRU – Approval of overtime for ANI personnel
PO 19/SRU – Termination of workplace relations
PO 20/SRU – Evaluation of contractual personnel’s professional performances
PO 21/SRU – Plan for occupancy of public functions
PO 22/SRU – Monitoring compliance with conduct norms of public servants within ANI
PO 23/SRU – Granting salaries to ANI personnel
PO 24/SRU – Organizing and conducting the contest/exam for recruiting public operating positions within ANI
PO 25/SRU – Redistribution of public servants, organizing and conducting professional testing within ANI
PO 26/SRU – Preparation, update and submission of public servants evidence register
PO 27/SRU – Preparation, approval and submission of quarterly reports on professional development of public servants within ANI and of the yearly report on Agency’s personnel professional development
PO 28/SRU – Preparation and modification of ANI’s ROF
PO 29/SRU – Organizing and conducting the contest / exam for recruiting/promotion for public management functions within ANI
PO 30/SRU – Preparation and management of personnel file

Operating procedure
<i>Labor Protection Department</i>
PO 01/CPM – Training on occupational security and health
PO 02/CPM – Introductory and general training on occupational security and health
PO 03/CPM – On the job training on occupational security and health
PO 04/CPM – Periodic training on occupational security and health
PO 05/CPM – Collective training
PO 06/CPM – Drawing up own instructions on occupational security and health
PO 07/CPM – Research, registration, declaration and record-keeping of labor accidents and professional illnesses
PO 08/CPM – Risk assessment
PO 09/CPM – Drawing up the prevention and protection plan
PO 10/CPM – Preparing the list of employees’ protection equipment
PO 11/CPM – Supervision of workers’ health
PO 12/CPM – Maternity protection at the workplace
PO 13/CPM – Organization and operation of the health and safety committee
<i>President’s/ Vice president’s office</i>
PO 01/CP – Submission for approval of documents and internal and external correspondence
PO 02/CP – Issuing orders
PO 03/CP – Making appointments to the president
PO 04/CP – Keeping records of the working hours of the dignitary offices
<i>Commission for monitoring, coordination and methodological guidance of the ANI managerial control system development</i>
PS 01/SCM – Risk management
PS 02/SCM – Functioning of the SCM monitoring commission and risk management team organized within ANI
PS 03/SCM – Drafting of the operational procedures specific to the ANI activities
PS 04/SCM - Preparation of Scorecard – basis of discussions scheduled at the Cabinet of the President
PS05/SCM - Drafting quarterly / annual report for SGG regarding the implementation and development of control systems management within ANI
PS 06/ANI - Inventory of assets and liabilities
PS 07/ANI - Archiving and keeping documents within ANI
PS 08/SCM - Managing sensitive functions
PS 09/SCM - Evaluation and inventory of goods received free of charge in connection with protocol actions
PS 10/SCM –Integrity warnings- Protection of staff in public authorities, public institutions and other units reporting violations of the law

Operating procedure
<i>Internal Public Audit Department</i>
PO 01 / CAPI - Preparation of the Internal Public Audit Department activity
PO 02 / CAPI - Preparation of the Annual Report of Internal Public Audit Activity
PO 03/CAPI – Human resources management within CAPI
PO 04/CAPI – Performance of internal public audit missions based on the Internal public audit annual plan
PO 05/CAPI – Prepare internal public audit engagements
PO 05.1/CAPI – Order of work preparation and circulation
PO 05.2/CAPI – Auditor’s independence statement
PO 05.3/CAPI – Notification of audited structure on the start of audit engagement
PO 05.4/CAPI – Opening/Kick-off meeting for audit engagements
PO 06.1/CAPI – Conducting of the "intervention of auditors on site" stage
PO 06.2/CAPI – Preparation and circulation of Closing meeting minute
PO 07/ CAPI - Audit engagement report preparation
PO 08/CAPI – Follow up on the implementation of recommendations from previous engagements reports
PO 09/CAPI – Supervision of audit engagements
PO 10/CAPI – Personnel evaluation
PO 11/CAPI – Internal auditors national attestation process
PO 12/CAPI – Performing consulting engagements
PO 13/CAPI – Preparation and update of “Applicable legislation on auditable domains” Registry
PO 14/CAPI – Designing and monitoring the Program for providing and improving the quality of the internal public audit
PO 15/CAPI – Designing and revising the Methodological rules on the exercise of the internal public audit at ANI
PO 16/CAPI – Conduct of the ad-hoc engagement
PO 17/ CAPI – Conduct of the internal audit performance mission
PO 18/ CAPI - Conduct of the system audit mission

Operating procedure
<i>Legal, Public Relations and Communication General Directorate</i>
PO 01/ DJCRP – Drafting the documents and ANI representation before courts
PO 02/ DJCRP – Procedure regarding the approval of ANI contracts
PO 03/ DJCRP – Procedure regarding the approval of ANI internal documents
PO 04/ DJCRP – Procedure ways and conditions to keep, record and archive DJCRP documents (started/prepared by)

PO 05/ DJCRP – Monitoring, analysis and dissemination of applicable jurisprudence, specific to ANI activity
PO 06.1/ DCRPS – Drafting the answers to the requests formulated under the Law no. 544/2001
PO 06.2/ DGJCRP – Drafting the answers to the requests formulated under the Government Ordinance no. 27/2002
PO 07/ DJCRP – Monitoring, analysis and dissemination of applicable jurisprudence, specific to ANI activity
<i>Communication, Public Relations and Strategy Directorate</i>
PO 01/ DCRPS – Drafting the answers to the requests formulated under the Law no. 544/2001
PO 02/ DCRPS – Drafting media materials
PO 03/ DCRPS – Performance of media monitoring activities
PO 04/ DCRPS – Organization of protocol events
PO 05/ DCRPS – Organization of domestic and international travels
PO 06/ DCRPS – Follow-up on the fulfillment of the ANI allocated measures to achieve the MCV conditions, within the framework of the National Anticorruption Strategy as well as in the evaluations of G.R.E.C.O.
PO 07 / DCRPS - Drafting ANI communication strategy
PO 08/ DCRPS - Communication of public interest information to individuals, legal entities or mass-media that are presenting at ANI
<i>General Records</i>
PO 01/RGA –Receiving, sorting, checking and distributing correspondence from the Romanian National Post Company, Military Post and Courier Post within ANI
PO 02/RGA - Preparing and sending mail
PO 03/RGA –The Circuit of petitions within ANI
PO 04/RGA –The Circuit and the recording of correspondence requested during the assessments by II
PO 05/RGA –Processing of the Statements of Interests and Wealth
PO 06/RGA –Processing and transmission of the Statements of Interest and Wealth to the Star Storage Archiving Service Provider
PO 07/RGA - Recording audience requests and sending them to C.P.
PO 08/RGA - Phone call pick-up and targeting them activity
PO 09/RGA - Managing C.N.I. (dispatch)

Operating procedure
<i>Economic Directorate</i>
PO 04.1/C/DGE - Keeping the record of the expenses related to international travel, on the budgetary classification structure
PO 04.2/C/DGE - Keeping the record of the documents related to the cash collections and payments in "lei"
PO 05/F/DGE - Activity of preparation and justification of the budgeted expenses of the Agency
PO 05/C/DGE - The monthly, quarterly and annually activity of editing the general ledger, account details and synthetically and analytical balance sheet, using SAP system
PO 06/ANI - Inventory of assets and liabilities
PO 6.1/F/DGE - Activity of expenses commitment
PO 06.1/C/DGE - Stocks record of consumables in commercial management program
PO 6.2/F/DGE - Activity of expenses clearance
PO 06.2/C/DGE - Evidence of tangible and intangible assets in course of execution
PO 06.3/F /DE - Activity of expenses authorization
PO 06.4/F/DE - Activity of expenses payment
PO 06.4/C/DGE - Preparing the inventory numbers registry
PO 06/C/DE - Accounting records of salary expenses on the budgetary classification structure
PO 06.5/C/DGE - Decommissioning and discarding of the fixed assets and inventory items in use
PO 6.5/F/DGE - Organization, recording and reporting of budgetary appropriations, legal appropriations, approved commitment appropriations and employed commitment appropriations
PO 07/C/DGE - Preparing, signing, submitting, composition, and instructions on filling in ANI quarterly and annual financial statements
PO 08/C/DGE - Preparing the inventory register
PO 8.1/F/DGE - Performing the Cash operation in "lei"
PO 04.1/C/DGE - Keeping the record of the expenses related to international travel, on the budgetary classification structure
PO 04.2/C/DGE - Keeping the record of the documents related to the cash collections and payments in "lei"
PO 05/F/DGE - Activity of preparation and justification of the budgeted expenses of the Agency
PO 05/C/DGE - The monthly, quarterly and annually activity of editing the general ledger, account details and synthetically and analytical balance sheet, using SAP system
PO 06/ANI - Inventory of assets and liabilities
PO 6.1/F/DGE - Activity of expenses commitment
PO 06.1/C/DGE - Stocks record of consumables in commercial management program
PO 6.2/F/DGE - Activity of expenses clearance

Operating procedure
<i>Economic Directorate</i>
PO 8.2/F/DGE - Performing the Cash operations in foreign currency
PO 9.1/F/DGE - Filling in and verification of the "lei" Cash Registry
PO 9.2/F/DGE - Filling in and verification of the foreign currency Cash Registry
PO 10/F/DGE - Preparing the payment orders for the payments performed from the expenses and availabilities accounts, opened by the Agency at the State Treasury, based upon the payment authorizations approved by the credit release authority
PO 11/F/DGE - Preparing the payment sheets and submitting them to the State Treasury
PO 12/F/DGE - Obtaining the account statements from the State Treasury and Credit Europe Bank
PO 13.1/F/DGE - - Preparing the Situation regarding monitoring of personnel expenses in the month ... year ...
PO 13.2/F/DGE - Quarterly monitoring of the personnel expenses
PO 14.1/F/DGE - Preparation and submission of the Declaration regarding the payment obligations to the state budget, code 14.13.01.99/bs -D100
PO 14.2/F/DGE - Preparation and submission of the Statement on payment obligations of the social contributions, income tax and individual evidence of insured persons
PO 15/F/DGE - Checking the domestic and international travel expenses
PO 16/F/DGE - Archiving and keeping registers and financial - accounting documents
<i>Investment and Public Procurement Department</i>
PO 01/ BAPIGP - Procurement through the "request for offer" procedure of goods / services / works
PO 02/ BAPIGP - Procurement through direct acquisition of goods / services / works
PO 03/ BAPIGP - Elaboration and update of the Public Acquisition Annual Program
PO 04/ BAPIGP - Procurement through "open bidding" procedure of goods / services / works
PO 05/ BAPIGP - Preparation of tender documentation within the public acquisition procedures
PO 06/ BAPIGP - Administration of the public procurement contract
PO 07/ BAPIGP - Monitoring the establishment and return of the good performance bond for public acquisition contracts
PO 08/BAPIGP - Preparing the reception note
PO 09/BAPIGP - Preparing the storage sheet
PO 10/BAPIGP - Preparing the consumption ticket
PO 11/BAPIGP - Evidence and keeping the original version of the public acquisition contracts
<i>Information Technology</i>
POL - 01/SMSI IT Security Management System Policy
POL - 02/SMSI Computer security policy
POL - 03/SMSI Security regulations for users of information resources
POL - 04/SMSI Information classification policy
POL - 05 Physical Security Policy
PO 01/STI - Users account management
PO 02/STI - IT incidents management
PO 03/STI - Configuration management

Operating procedure
PO 04/STI - Change Management
PO 05/STI - Patch Management
PO 06/STI - Monitoring of IT services provided by third parties

APPENDIX 2 Implementation Status of action measures related to ANI Strategy for combating and preventing undue accumulation of assets, conflicts of interest and states of incompatibility

Objective no. 1: Boosting prevention and awareness activities

1.1 Preventing the conflict of interest in public procurement

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as 31.12.2017
1.1.1.	Implementation and full functioning of the computer system PREVENT after publication in the Official Journal;	Permanent action and annually evaluated	<p>No. of procurement procedures analyzed</p> <p>No. of integrity warnings issued</p> <p>No. of conflicts of interest prevented</p>	<p>Technical malfunctions</p> <p>The delay of the regulation's approval</p>	ANI	<p>Implemented</p> <p>PREVENT system was officially launched at the end of June 2017.</p> <p>According to the data provided by the management of ANI, during the reference period, 8,896 public procurement procedures were analyzed through PREVENT system.</p> <p>During the same reporting period, integrity inspectors issued eight integrity warnings related to possible violations of the law regarding conflicts of interest in public acquisitions.</p> <p>Furthermore, the integrity inspectors notified the National Agency for Public Procurement (ANAP) that a number of 28 irregularities regarding possible relationships which may exist between persons from</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as 31.12.2017
						the contracting authority and persons from the category of the economic operators who have bidding capacity in the procurement procedures initiated by a contracting authority.
1.1.2.	Entry of the law on preventing conflict of interest in public procurement and monitoring on how it applies;	July 2016	The law published in MOF Statistical data resulting from PREVENT	Delayed approval of the legislative text Submission of amendments which are not consistent with the law	The Romanian Parliament	Implemented Law no. 184/2016 <i>regarding the establishment of a mechanism for prevention of the conflict of interests in the procedure of awarding the public procurement contracts</i> was adopted by the Parliament of Romania and was published in the Official Gazette no. 831 of 20 October 2016. According to the legal provisions, the PREVENT computer system became operational on 20 June 2017. The quarterly activity reports published by ANI include statistical data on the results obtained under the conflict prevention mechanism in public procurement financed through national and European funds. Additionally, in September 2017, ANI issued a press release on the first results of PREVENT System.
1.1.3.	Publication of statistical data in open format on the results of the conflict of interest prevention mechanism in public procurement financed	Permanent action and annually evaluated	Statistical data published on the website of ANI	N/a	ANI	Implemented The quarterly activity reports published by ANI include statistical data on the results obtained under the conflict prevention mechanism in public procurement financed through national and European funds. Additionally, in September 2017, ANI issued a press release on the first results of PREVENT System.

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as 31.12.2017
	from national and European funds.					

1.2 Preventing corruption and integrity incidents among the members of Parliament

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
1.2.1.	Working with Parliament to improve the consulting system regarding the integrity, by providing regular specialized training and clarifying implications for the members of Parliament on the conflicts of interest, incompatibilities and enforcement in practice, in line with the recommendations of GRECO	May 2017	<p>Joint Working Group</p> <p>Performed study</p> <p>Designated ANI expert</p> <p>Formalized consulting system</p> <p>Number of joint meetings with the decisive factors from both entities</p>	Lack of human and technical resources availability of	<p>ANI</p> <p>The Romanian Parliament</p>	<p>Partially implemented</p> <p>An integrity inspector has been appointed to clarify certain aspects of how to fill in the wealth and interest statements as well as to observe the deadlines for their submission because of the relationship developed with those responsible for the implementation of D.A.I. from the two Chambers of Parliament.</p> <p>A Task Force consisting of senior staff from the Integrity Inspectorate of ANI was set up to improve the integrity counseling system for deputies and senators.</p> <p>Next, ANI conducted an internal study on the recurring situations of conflicts of interest and incompatibilities among MPs for the past three years. The conclusions of the analysis were transmitted to GRECO in June 2017, in order to report on the progress made by the Agency</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>to implement the recommendations for this category of public office.</p> <p>Some of the conclusions included in the analysis were brought to the attention of the persons concerned whenever ANI issued a press release on the application of disciplinary sanctions, in accordance with the law, in the case of some MPs.</p> <p>At the same time, the Agency sends to the European Commission, the steps taken to apply disciplinary sanctions to deputies and senators through progress reports from the Agency in the context of the Cooperation and Verification Mechanism.</p>
1.2.2.	Identify ways to accelerate and enforce judgments relating to incompatibilities for the members of Parliament	May 2017	Ways to implement the identified and formalized judgments	N/a	ANI The Romanian Parliament	<p>Implemented</p> <p>The "Procedure for the communication of procedural acts to the Integrity Inspection" was issued to ensure the speedy communication of the courts' solutions to the integrity inspectors, in order to dispose of the legal measures required as result of the evaluation reports becoming definitive.</p> <p>The operational procedures were updated indicating that the integrity inspector requests from D.G.J.R.P.C. an opinion regarding regulatory issues, prior to forwarding the requests to the Parliament.</p> <p>ANI continued to take steps to enforce court rulings requesting the Parliament (8 requests in 2017) to enforce legal provisions regarding the persons for</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						whom the courts had issued final and irrevocable decisions confirming the Agency's findings.

1.3 Preventing corruption and integrity incidents among judges and prosecutors

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
1.3.1.	Strengthen the cooperation with CSM in order to provide assistance in relation to the Code of Ethics on the recommendations of GRECO Report	May 2017	<p>Joint organized events</p> <p>Designated ANI expert</p> <p>Formalized consulting system</p>	Lack of human and technical resources availability of	<p>ANI</p> <p>CSM</p>	<p>Partially implemented</p> <p>At the request of the Superior Council of Magistracy, the National Integrity Agency issues views on possible incidents of integrity found, which concern the magistrates.</p> <p>Between November 13-14, 2017, two integrity inspectors participated in the meeting on <i>"Combating crime in the priority areas of the Public Ministry: corruption, conflict of interests, tax evasion, smuggling and money laundering"</i>, which took place in Poiana Brasov.</p> <p>The meeting was attended by general prosecutors of the prosecutor's offices attached to the courts of appeal and the prosecutors of the prosecutor's offices attached to the tribunal, as well as the prosecutors who managed the cases selected to be presented at the meeting.</p> <p>No joint events have been organized in partnership by the two institutions until now.</p>
1.3.2.	Increasing training efforts and awareness of integrity	May 2017	Joint organized events	Lack of human and technical	ANI	Implemented

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
				resources availability of	CSM	<p><u>Collaboration protocol with the National Institute of Magistracy</u></p> <p>In June 2017, ANI signed a cooperation protocol with the National Institute of Magistracy, with the main objectives organization of initial training actions for justice and continuous training for judges and prosecutors, as well as integrity inspectors, on themes of common interest, ensuring the dissemination of informative materials on issues of conflict of interest, incompatibilities, ensuring integrity in the exercise of public dignities and functions, and preventing institutional corruption against judicial auditors, judges and prosecutors.</p> <p><u>Working meeting "Combating crime in the priority areas of the Public Ministry: corruption, conflict of interest, tax evasion, smuggling and money laundering"</u></p> <p>Between November 13-14, 2017, two integrity inspectors participated in the meeting "Combating Crime in Priority Areas of the Public Ministry: Corruption, Conflict of Interest, Tax Evasion, Smuggling and Money Laundering".</p> <p>The meeting was attended by general prosecutors of the prosecutor's offices attached to the courts of appeal and the prosecutors of the prosecutor's offices attached to the tribunal, as well as the</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						prosecutors who managed the cases selected to be presented at the meeting.

1.4 Enforcement of the integrity rules in the electoral processes organization

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
1.4.1.	Improving the effectiveness of reporting and submission of DA / DI	December 2016	<p>The number of notifications sent to prefectures</p> <p>Contact Person designated within ANI</p> <p>Number of meetings held at local / central level</p>	Lack of responsiveness of decision makers at the local / central level	<p>ANI</p> <p>Prefectures</p> <p>Parliament</p> <p>AMR</p> <p>AOR</p> <p>ACR</p>	<p>Implemented</p> <p>In the context of the local elections in 2016, with the support of the Ministry of Internal Affairs, ANI organized a videoconference with all prefects in the territory. This aimed to optimize the process of filling in and submitting the wealth and interests declarations, as well as the dissemination of useful information on improving the flow of transmission of wealth and interest statements to A.N.I.</p> <p>In order to clarify the difficulties in filling in the declarations and the efficiency of the system of declaration and submission of the assets and interests</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>statements, the Agency transmitted to all counties prefects:</p> <ul style="list-style-type: none"> • the Electronic forms of the assets and interests statements, • the Guide for completing the declarations of assets and interests • the Guide on Incompatibilities and Conflicts of Interest. <p>In addition, with the help of the Permanent Electoral Authority and the Central Electoral Bureau, ANI has disseminated information to all categories of entities involved in the electoral process as well as to legally established political parties and has submitted to the above mentioned authorities both Guidelines on Incompatibilities and Conflicts of Interests / Completion of Wealth and Interests statements, Electronic Forms of DAI, as well as the list of persons under the interdiction to occupy a public office or dignity for a period of 3 years.</p> <p>Integrity inspectors have been appointed to respond to a special telephone line, providing specialist assistance to candidates, the legal status of completing wealth and interest declarations, incompatibilities and conflicts of interest. In addition, a unique email address was provided, where individuals and entities submitted complaints and requests for points of view.</p>
1.4.2.	Updating guidelines on incompatibilities and conflicts of	June 2016	Updated guide	N/a	ANI NGOs	Implemented The National Integrity Agency has updated the Guidelines for filling the wealth and interest statements

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
	interest / DA / DI completion					as well as the Guidelines on Incompatibilities and Conflicts of Interest available on the Agency's website.
1.4.3.	Study regarding the repetitive cases in matter of conflicts of interest and incompatibilities with reference to several categories of public offices	June 2016	Drafted study	N/a	ANI NGOs	Implemented Based on the expertise accumulated in the field of integrity incidents, the National Integrity Agency has synthesized, in the context of the local and parliamentary elections of 2016, the most frequent cases of incompatibilities and conflicts of interest applicable to local elected representatives and members of Parliament, alongside the cited law, which are published on the website of the Agency.
1.4.4.	DA / DI Collection and publication in a separate section on the website	June 2016	All statements published on the ANI website	Delays caused by the documents transmission by the electoral offices	ANI External provider	Implemented The wealth and interest statements submitted in the context of the 2016 elections were collected, processed and published in a separate section on the website of the Agency. Thus, approximately 520,000 statements of candidates in local elections and 11,490 statements of candidates in parliamentary elections were published.
1.4.5.	Creating a special contact line for effective	June 2016	Special section published on the ANI website	Delays in design and programming execution	ANI External provider	Implemented In the context of the local and parliamentary elections of 2016, ANI has created a dedicated section on its website, which has a special contact point for making

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
	communication with candidates					<p>communication with the candidates more efficient. In this respect, integrity inspectors have been appointed to respond to a special telephone line, providing specialist assistance to candidates for elections, regarding the legal status of completing wealth and interest declarations, incompatibilities and conflicts of interest. In addition, a unique email address was provided where individuals and entities submitted complaints, requests for views on the legal status of incompatibilities and conflicts of interest, or regarding filling in the wealth and interest statements.</p> <p>Furthermore, the Agency updated the Guidelines on Incompatibilities and Conflicts of Interest / filling in the wealth and interest statements available on the institution's website.</p>
1.4.6.	Updating the list of people under the ban to run for elective position	June 2016	<p>Updated list of persons</p> <p>Updated web section</p>	N/a	ANI	<p>Implemented</p> <p>The National Integrity Agency permanently updates the section "Definitive Incompatibilities - 3 Years Ban" on its Internet site. Moreover, in the context of local and parliamentary elections in 2016, ANI has created a distinct section that included the list of locally elected representatives and parliamentarians under the ban on holding a public office or dignity for a period of three years.</p>
1.4.7.	Creating a special section on the ANI website that would group all relevant	June 2016	Special section created and	Delays in design and	ANI	<p>Implemented</p> <p>A special section grouping all relevant information on the candidates' election obligations as well as other</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
	information on the existing obligations that all the candidates in elections have.		available on the ANI website	programming execution	External provider	informative materials were created on the Agency's websites. The section has been updated permanently, distinctly, for each category of functions.

1.5 Preventing corruption and integrity incidents among civil servants

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
1.5.1.	Collaboration with the National Agency of Civil Servants in order to organize training courses on integrity compliance in public function	Permanent action, annually evaluated	No of organized common events	Lack of availability of human and technical resources	ANI ANFP	<p>Partially implemented</p> <p>ANI leadership has initiated discussions with representatives of the National Institute of Administration, in order to organize trainings, where experts from the Agency will participate in the professional development of future civil servants.</p> <p>Throughout 2017, integrity inspectors participated as speakers at a series of events targeting civil servants in the central and local public administration. On this occasion, Agency staff held presentations on the importance of following the integrity rules in public office.</p> <p>Until this moment, no events were organized in partnership with ANFP.</p>
1.5.2.	Adopting measures in order to improve the submission process for the assets and interests statements	Permanent action, annually evaluated	<p>Number of information sent to public institutions</p> <p>Designated Contact Person within ANI</p> <p>Number of meetings held</p>	Lack of responsiveness from decision makers	ANI Decision makers in public institutions	<p>Implemented</p> <p>Between May 24 and 26, 2017, ANI has organized several training sessions dedicated to optimizing the process of filling in wealth and interest declarations by using online and offline electronic forms. On this occasion, approximately 300 people were trained in optimizing the process of filling in wealth and interest statements.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>A.N.I. has updated the <i>Guide to filling in wealth and interest statements</i> and the <i>Incompatibilities and Conflicts of Interest Guide</i>, which also includes a Q&A section, available on the institution's website.</p> <p>ANI has designated integrity inspectors responsible for assisting interested parties, on how to fill in and submit declarations of assets and interests.</p> <p>A dedicated email address has been created for the persons who want to use electronic forms (with or without electronic signature), eforms@integritate.eu, managed by S.T.I.</p> <p>At the beginning of June 2017, ANI issued a press release informing the public about the deadline for submitting the assets and interests statements. The press release has synthesized information such as legal provisions on the filing and filing of statements, links to electronic forms, the <i>Guide to filling in wealth and interest declarations</i>, the <i>Incompatibilities and Conflicts of Interests Guide</i>, and the Frequently Asked Questions section. The press release also included an infographic on the submission of wealth and interest statements in electronic format, designed to facilitate the process of filing in and submitting statements in electronic format.</p> <p>At the same time, during the year 2017, the National Integrity Agency issued a number of 157</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>points of view to natural and legal persons on how to fill in and submit statements.</p> <p>Between June and August 2017, integrity inspectors were appointed to contribute to the prompt processing of wealth and conflict of interest statements.</p>

1.6 Preventing corruption and integrity incidents among local elected officials

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
1.6.1	Fostering the prevention activity through spreading guides and informative materials about the consequences of breaches of integrity	June 2016	Guidelines and updated materials	N/a	ANI	<p>Implemented</p> <p>In the context of the 2016 local and parliamentary elections, the National Integrity Agency has updated the Guide to filling in wealth and interest statements, as well as the Guide on Incompatibilities and Conflicts of Interest, available on the Agency's website.</p> <p>In the year 2017, the Agency issued two infographics on <i>Conflicts of interest and incompatibilities among parliamentarians</i>, as well as the <i>submission of wealth and interest statements in electronic format</i>.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>Furthermore, the <i>Guide for filling in the wealth and conflict of interest statements and the Incompatibilities and Conflicts of Interest Guide</i>, which includes a section of questions and answers, have also been updated and are available on the Agency's website.</p> <p>Furthermore, the <i>Guide for filling in the integrity form</i>, available on the Agency's website, has been developed in the special section PREVENT.</p> <p>Integrity inspectors within the events they attended have disseminated these guides.</p>
1.6.2	Developing and implementing projects to prevent conflicts of interest and incompatibility situations at central public administration level	Permanent action and annually evaluated	<p>Cooperation agreements initiated</p> <p>No. of common events organized</p>	<p>Not allocated necessary resources</p> <p>The lack of responsiveness decision makers at central level</p>	<p>ANI</p> <p>Decision makers at the central public administration level</p>	<p>Implemented</p> <p>In the of conflicts of interest area, the operational procedure regarding the assessment of compliance with the legal provisions on conflicts of interest in the public procurement procedures carried out through SEAP by local public authorities entered into force in 2017.</p> <p>During the events attended, the integrity inspectors distributed to the participants about 400 copies of the <i>Integrity Form Completion Guide</i>, available on the Agency's website, PREVENT section.</p> <p>In 2017 ANI initiated and / or implemented the following projects to prevent conflicts of interest and incompatibilities in the central and local public administration:</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p><u>Project Early identification and prevention of conflicts of interest in the local public administration</u></p> <p>On the 22nd of May, the National Integrity Agency and the Institute for Public Policy (IPP) organized a debate on the launch of the national poll "Perceptions and Attitudes of the People on Conflict of Interests at Central and Local Level in Romania", conducted within the Identification Early and Prevention of Conflicts of Interests in Local Public Administration, implemented through the Swiss-Romanian Cooperation Program.</p> <p>The event was attended by the representatives of the Legal Commissions in the Romanian Parliament, the diplomatic environment and the central and local public administration.</p> <p>As part of the project, the representatives of the Agency participated in a series of regional debates organized in 7 cities in Brasov, Iasi, Brăila, Sibiu, Cluj, Dolj and Timiș from October to November, attended by approximately 200 secretaries of territorial-administrative units, as well as public servants with responsibilities in the prevention of corruption within UATs.</p> <p>During these sessions, the Agency representatives presented the PREVENT ex-ante verification system to prevent conflicts of interest in the procurement procedure.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p><u>The Postgraduate Program "Public Integrity and Anti-Corruption Policies"</u></p> <p>Based on the partnership between the National Integrity Agency and the Faculty of Political, Administrative and Communication Studies (FSPAC) of the Babeş - Bolyai University of Cluj - Napoca, in January and March, an expert from ANI held two lectures in the postgraduate program "<i>Public Integrity and Public Policy Anticorruption</i>".</p> <p>Thus, the Agency's expert shared with the students the experience gained in identifying incompatibilities and conflicts of interest, how to fill in the wealth and interest statements, wealth assessment, the effectiveness of public policy strategies and policies in public integrity.</p> <p>On October 20, 2017, the President of the Agency participated in the debate held in Cluj - Napoca in the event related to the graduation of the postgraduate course "<i>Public Integrity and Anti - Corruption Policies</i>" by the first two program promotions.</p> <p>The program was launched in October 2016 on the basis of the partnership between the National Integrity Agency and the Faculty of Political, Administrative Studies and Communication (FSPAC) of the Babeş - Bolyai University in Cluj - Napoca and aims to increase the level of education among certain groups of persons - civil servants, teachers, students, in order to prevent conflicts of interest in the public administration.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p><u>Cooperation protocol with the Ministry of Culture</u></p> <p>In December 2017, the Agency signed a cooperation protocol with the Ministry of Culture and National Identity with the main objective to strengthen cooperation and coordination of institutional efforts in order to make effective the mechanisms for preventing and combating corruption in the exercise of public functions and dignities.</p> <p>According to this protocol, experts from the Agency will be involved in the training of the staff within the Ministry as well as in its subordinated institutions by conducting prevention and awareness-raising activities for integrity incidents by providing the points of views requested by the responsible personnel for implementation of the legal provisions on integrity and will carry out activities to raise awareness of the importance of the compliance with the legal framework.</p> <p><u>PREVENT Seminar</u></p> <p>In October, the National Integrity Agency, together with the Expert Forum Association, organized a training in Cluj-Napoca on the PREVENT program, which aims at completing the integrity forms related to the award procedures, as well as incompatibilities and conflicts interests in public procurement procedures.</p> <p>The event brought together about 50 representatives of public institutions at local level and aimed to support the work of contracting authorities in order to better</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>understand their obligations regarding the ex-ante system of public procurement, PREVENT and the procedures that this program requires.</p> <p><u>Training sessions on optimizing the process of electronic filling wealth and interest statements</u></p> <p>Between May 24 and May 26, 2017, ANI has organized several training sessions dedicated to optimize the process of filling wealth and interest statement by using online and offline forms, where about 300 people have been trained in optimizing the process of filling wealth and interests statements.</p> <p>At the same time, the <i>Guide for filling the wealth and interests statements</i>, as well as an infographic on the submission of wealth and interests statements in electronic format, meant to facilitate the process of filing and submission of the statements in electronic format, were disseminated.</p>

1.7 Improvement of prevention and awareness at all levels

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
1.7.1.	Professional training of persons from public institutions designated to implement the law on DA / DI	Permanent action and annually evaluated	50 trained persons	Lack of budgetary resources	ANI	<p>Implemented</p> <p>Between May 24 and May 26, 2017, ANI has organized several training sessions dedicated to optimize the process of filling wealth and interest statement by using online and offline forms, where about 300 people have been trained in optimizing the process of filling wealth and interests statements.</p> <p>At the same time, the <i>Guide for filling the wealth and interests statements</i>, as well as an infographic on the submission of wealth and interests statements in electronic format, meant to facilitate the process of filing and submission of the statements in electronic format, were disseminated.</p>
1.7.2.	Implementing „software“ programs for constant education of persons covered by Law 176/2010	January 2018	Projected program Program implemented in 5 pilot institutions	Lack of availability of human and technical resources	ANI	<p>Not implemented</p>

General objective no. 2: identification and sanction of incompatibilities, conflicts of interest, unjustified wealth and ensure the compliance with the legal regime of DA / DI submission

2.1 Improvement of integrity incidents evaluation

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
2.1.1.	Continue to identify and sanction integrity incidents	Permanent action and annually evaluated	<p>Number of evaluation reports issued</p> <p>Number of administrative penalty imposed</p> <p>Number of final evaluation reports provided to the institutions for taking disciplinary action</p>	N/a	ANI	<p>Implemented in 2017</p> <p>In 2017, integrity inspectors from ANI have completed 1,991 evaluation reports, indicating the existence of integrity incidents or classified the file.</p> <p>Moreover, integrity inspectors applied 1,073 sanctions for minor offenses, most of them for failing to submit or late submitting statements of wealth and interests and for disregarding disciplinary sanctions because of the final retention of the evaluation report, all categories of persons prescribed by law.</p> <p>Because of the final assessment reports issued by A.N.I, integrity inspectors have requested institutions to take disciplinary measures that are required by law in 300 cases.</p>
2.1.2.	Strengthening the proactive approach in monitoring the statements of assets and interests	Permanent action and annually evaluated	No. studies prepared on compliance with the legal regime of incompatibilities, conflicts of interest	N/a	ANI	<p>Partially implemented</p> <p>On May 22, the National Integrity Agency and the Institute for Public Policy (IPP) organized a debate on the launch of the national poll regarding <i>the perceptions and attitudes of the public regarding conflict of interest at central and local level in Romania</i></p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
			<p>or unexplained wealth</p> <p>No. of assessment procedures initiated as a result of studies</p>			<p>- the first national survey on the Romanian people's perceptions on conflicts of interest, realized within the <i>Early identification and prevention of conflicts of interest in the local public administration</i>, implemented through the Swiss-Romanian Cooperation Program.</p> <p>Based on the project, the representatives of the Agency participated in a series of regional debates organized in 7 cities in Brasov, Iasi, Brăila, Sibiu, Cluj, Dolj and Timiș from October to November, attended by approximately 200 secretaries territorial-administrative units, as well as civil servants with responsibilities in the prevention of corruption within ATUs.</p> <p>During these sessions, the Agency representatives presented the PREVENT ex-ante verification system to prevent conflicts of interest in the procurement procedure.</p> <p>These activities were carried out under the <i>Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania</i>, initiated in collaboration with the Secretariat Associations at the level of the cities and counties</p>
2.1.3.	Improving the quality of evaluation reports issued by the integrity inspectors	Permanent action and annually evaluated	Updated operational procedure	N/a	ANI	<p>Implemented</p> <p>In order to improve the quality of the evaluation reports issued by the National Integrity Agency, the permanent updating of the operational procedures of</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>the Intelligence Inspection General Directorate was ordered.</p> <p>At the same time, the minutes of the phone or the hearing the customization, aspects that are found in the operational procedures, was also ordered.</p> <p>Moreover, the evaluation reports are drawn up by reference to the Agency's practice maintained by the courts, and contain relevant case law on the integrity incident.</p>

2.2. Effective monitoring of the status of cases completed by ANI that come before the courts

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
2.2.1.	Increasing the confirmation percentage of cases completed by ANI	Permanent action and annually evaluated	The confirmations percentage for each category of incidents greater than 80%	N/a	ANI	<p>Partially implemented</p> <p>At the end of 2017, the final statement of ANI in the case of unjustified wealth, conflicts of interest and incompatibilities is as follows: out of the 1,109 final cases of incompatibility, 874 were won by ANI, the percentage of confirmation of the Agency's findings regarding incompatibilities being 78,81%, the 326 cases of administrative conflicts of interest remained final, 306 were won by ANI, the percentage of confirmation of the Agency's findings in the field of administrative conflicts of interest being 93.87%;</p> <p>out of the 31 cases of unjustified wealth remaining final, 20 were won by A.N.I., the percentage of confirmation of the Agency's findings regarding the unjustified wealth being 64.52%;</p> <p>Furthermore, by the end of 2017, the courts issued 1,575 final decisions on complaints against administrative fines applied by ANI In 1,286 out of these cases, the decision was to maintain the contravention sanctions applied by ANI. Thus, the percentage of confirmation of administrative fines applied by ANI is 81.65%.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>240 files were permanently settled in 2017, out of which 178 were won and 62 were lost. Based on the typology point of view, the files were as follows:</p> <p>Incompatibility: 116 cases won and 58 cases lost by ANI; Conflict of interests: 56 cases won and 3 cases lost by ANI; Unjustified wealth: 5 cases won and 0 cases lost by ANI; Combined: 1 case won and 1 case lost by ANI.</p>
2.2.2.	Improving the activity referring to	Permanent action and annually evaluated	<p>Meet the deadlines of response to requests under Law no. 544</p> <p>Updated Procedure</p> <p>Number of adopted measures</p>	The complexity of the requests addressed to ANI that require a longer time for response.	ANI	<p>Partially implemented</p> <p>In 2017, ANI issued points of view on the possibility of incompatibility and / or conflict of interest, as well as on how to fill in / submit statements of wealth and interests.</p> <p>There have been cases where the legal deadlines have been exceeded because of the high volume of requests submitted to ANI, relative to the number of staff assigned to respond.</p> <p>Two infographics were issued on the <i>topic Conflicts of interests and incompatibilities among parliamentarians</i> as well as the <i>submission of statements of wealth and interests in electronic format</i>.</p> <p>At the same time, the <i>Guide on filling in wealth and interest statements</i>, as well as the <i>Guide on Incompatibilities and Conflicts of Interest</i>, which</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>includes a Q&A section, have been updated and are available on the Agency's website.</p> <p>At the same time, the <i>Integrity Form filling in Guide</i>, available on the Agency's website, has been developed in the special section PREVENT.</p> <p>The National Integrity Agency has appointed integrity inspectors responsible for assisting interested parties on how to fill in and submit the statement of wealth and interests or fill in the integrity form.</p> <p>Additionally, in order to improve the work of assisting persons looking for clarification on the legislative framework governing the integrity system, the operational procedures for dealing with petitions within the General Directorate for Integrity Inspection and D.G.J.R.P.C. have been updated.</p> <p>Furthermore, the operational procedure for petitions is disclosed annually to integrity inspectors to improve the procedural steps provided by it.</p>
2.2.3.	Improve the recovery of the amounts ordered for confiscation by final and irrevocable decisions issued by courts, following	Permanent action, annually evaluated	Confirmation percentage for each evaluation report through which it retain unjustified difference between	<p>Lack of precautionary measures</p> <p>The low level of involvement of relevant</p>	<p>ANI</p> <p>ANAF</p>	<p>Implemented</p> <p>At the end of 2017, out of the 31 final cases of unjustified wealth, 20 were won by ANI by the final and irrevocable decisions of the courts. Thus, the percentage of confirmation of the Agency's findings on unjustified wealth is 64.52%.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
	procedures regarding unjustified wealth		income and wealth acquired	institutions and authorities		

General objective no. 3: Administrative consolidation of the National Integrity Agency

3.1 Internal consolidation of ANI's administrative activities

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
3.1.1.	Optimal assurance and efficient design of financial, human and technical resources	Permanent measure assessed on an annual basis	Parliament Approved Budget Filled in Personnel Scheme Purchased/Implemented Technical Resources	Lack of political will Economic instability	ANI The Government The Parliament	<p>Partially implemented</p> <p>Through the Budget Law, no. 6/2017, the budget of the National Integrity Agency for the year 2017 was approved for a total amount of 21,696,000 Lei of which:</p> <ul style="list-style-type: none"> ➤ Staff costs -9,696,000 Lei; ➤ Goods and services - 9.112.000 Lei; ➤ Capital expenditures - 2.888.000 Lei. <p>The budget of the National Integrity Agency for 2017, following the rectification, is 22,586,000 Lei, out of which:</p> <ul style="list-style-type: none"> ➤ Staff costs - 9,296,000 Lei; ➤ Goods and services - 10,402,000 Lei; ➤ Capital expenditures - 2.888.000 Lei. <p>During 2017 there were launched the procedures for organization and employment, through competition, for a leading public office and for 11 public execution positions.</p> <p>Upon completion of the procedures for organizing and conducting job competitions within the Agency, 4 positions were occupied. Two other posts were filled in January 2017, following the competition procedures started in 2016.</p> <p>In order to complete the necessary staffing, 3 positions within the Agency were filled by detachment.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						STI has made proposals to improve the entire IT & C infrastructure, and, depending on the budget, these proposals will also be implemented.
3.1.2.	Efficiently design resources in order to boost activity	Permanent measure assessed on an annual basis	Resources designed depending on needs Increase in the number of integrity inspectors Training of NIA staff	Insufficient financial resources	ANI	<p>Partially implemented</p> <p>Taking into account the small number of persons in public functions with special status within the Agency, related to the average of the files in progress, namely 93 files / inspector, in 2017 the procedures for organizing and carrying out the employment contests for a number of 8 public positions with special status was initiated, from which 2 were occupied.</p> <p>During 2017, 70 ANI employees (63% of the total number of employees) participated in training and retraining programs.</p>
3.1.3.	Increase in the number of externally funded projects or projects funded by the state budget	Permanent measure assessed on an annual basis	Number of initiated projects Number of implemented projects	Lack of budgetary resources	ANI External Partners	<p>Partially implemented</p> <p>In September, ANI provided two experts for a project proposal (CONFLICTPP – Conflict of interest in public procurement procedures: how to tackle and solve such instances with a minimum financial impact on the EU budget) submitted by the SAR to OLAF, which aimed at conducting an European study on Conflict interests. The project was rejected at the end of 2017.</p> <p>In October 2017, an application for funding "Increasing the capacity of the central public administration to prevent and identify cases of conflicts of interests, incompatibilities and unjustified wealth" was submitted via POCA, aimed to achieve the specific objective 5.2. of SNA.</p> <p>The project proposal contains the following specific objective:</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>OS1: Increasing the role of ethics counselors and control bodies on the integrity framework and the implementation of a procedure.</p> <p>OS2: Training of approximately 200 central civil servants on the integrity framework.</p> <p>OS4: Increase the capacity of the Agency by training in a EU member country a number of 40 integrity inspectors on the detection of unjustified wealth.</p> <p>This project proposal is under evaluation at AM POCA.</p>
3.1.4.	Extension and operationalization of the workspace	July 2016	Purchased and operationalized workspace	Lack of availability of adequate space	ANI The Romanian Government	<p>Partially implemented</p> <p>At the end of 2017, the operationalization of a secondary headquarters of the National Integrity Agency, which will serve as a working space for the administrative staff of the Agency, is in the process of being finalized.</p> <p>Procedures were initiated to connect the headquarters of ANI with secondary headquarters by expanding the physical security system.</p>
3.1.5.	Improving the institutional capacity by implementing recommendations made by the external auditors	Permanent measure assessed on an annual basis	Number of implemented recommendations	Lack of resources	ANI	<p>Partially implemented</p> <p>For the deficiencies identified throughout the 2009 - 2016 checks 12 recommendations were implemented, 12 recommendations were partially implemented and 7 recommendations were not implemented.</p>
3.1.6.	Improvement of the operational working procedures	Permanent measure assessed on an	Number of updated operational procedures	N/a	ANI	<p>Implemented</p> <p>In 2017, 183 operational procedures specific to ANI activities were updated / revised / issued.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
		annual basis				
3.1.7.	Increasing the quality of the conducted activities of the Public Internal Audit Department and the implementation of recommendations laid out in the Public Internal Audit Report	Permanent measure assessed on an annual basis	<p>Number of employees reported to the workload</p> <p>Number of audit system missions and performance audit missions included in the audit plan</p> <p>Certified internal auditors</p> <p>Workspace assigned to internal auditors</p>	Lack of budgetary resources	ANI	<p>Partially implemented</p> <p>Planned activity is performed 100% with the existing staff.</p> <p>In order to increase the quality of the activities carried out by the Internal Public Audit Compartment and to implement the recommendations formulated in the Internal Public Audit Report, a performance audit mission was carried out in 2017.</p> <p>At the same time, in 2017, a system audit mission was also carried out.</p> <p>The work area for the Internal Audit Compartment is compliant.</p> <p>The internal ANI auditors are not certified because the procedures mentioned in the Order of the OMFP no. 659/2015 modified by the Order of the OMFP no. 783/2016, have not been approved, which leads to the impossibility of certifying internal auditors by UCAAPI.</p>
3.1.8.	Elaboration of the Information Technology Policy	June 2016	Elaborated Information Technology Policy	N/a	ANI	<p>Implemented</p> <p>In April 2016, the Information Technology Service developed a document called the IT Strategy for 2015-2020, approved by ANI's Management.</p>

3.2 Increasing the efficiency of the Human Resources Policy

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
3.2.1.	Increasing the number of employees in supporting departments for Integrity Inspection	December 2016	Minimum 5 persons employed	Insufficient number of posts budgeted	ANI	<p>Implemented</p> <p>During 2016, there were launched the procedures for organizing and conducting contests for a number of 7 public positions within the Support Compartments for the Integrity Inspection; out of these, 1 was a public management position. 1 public management position and 6 public execution positions were occupied.</p> <p>Next, during 2017, the procedures for organizing and conducting employment contests for a number of 3 public positions, of which a leading public office, were started.</p> <p>A public management position and two public execution positions were occupied.</p>
3.2.2.	Increasing the number of integrity inspectors	Permanent measure assessed on an annual basis	Minimum 5 integrity inspectors employed / year	Insufficient number of posts budgeted Low exam pass rate	ANI	<p>Partially implemented</p> <p>In 2017 there were initiated the procedures for organizing and conducting employment contests for 8 public positions of special status, out of which two were occupied.</p>
3.2.3.	Elaborating the human resources management policy	January 2017	Issued policy	N/a	ANI	<p>Not implemented</p> <p>At the end of 2017, the Human Resource Management Policy was in the process of being developed.</p>
3.2.4.	Training ANI's experts on train the trainers component	Permanent measure assessed	Minimum 2 persons trained / year	Lack of training offers	ANI External suppliers	<p>Not implemented</p> <p>During 2017, a procedure for the participation of 14 integrity inspectors in the <i>TRAINING OF TRAINERS</i></p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
		on an annual basis				program was initiated, but it was not completed because it was not possible to ensure their participation to the training session.
3.2.5.	Integrity inspectors and administrative staff training	Permanent measure assessed on an annual basis	Minimum 15 persons trained / year	Lack of training offers Lack of budgetary resources	ANI External suppliers	Implemented in 2017 During the year 2017, a number of 70 ANI employees participated in training and retraining programs.

3.3 Streamlining of communication policy

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
3.3.1.	Elaborating the communication policy	January 2017	Issued policy	N/a	ANI	<p>Not implemented</p> <p>At the end of 2017, the Communication Policy was in the process of development.</p>
3.3.2.	Improving the communication process of information of public interest including those available on the Agency website	Permanent measure assessed on an annual basis	<p>Web sections updated annually</p> <p>Improved operational procedures</p>	N/a	ANI	<p>Implemented</p> <p>Web sections of the Agency website are permanently updated.</p> <p>At the same time, 75 public information materials were posted on the Agency's website in 2017.</p> <p>Following the entry into force of the Law no. 184/2016 regarding the setting up of a mechanism for preventing the conflict of interests in the procedure of awarding the public procurement contracts, the National Integrity Agency has launched on the website a distinct section, meant to inform the persons with attributions in the implementation of this normative act.</p> <p>Additionally, ANI published on the web page a set of useful information on completing the integrity form, and a list of the most frequent requests for information on the conflict prevention mechanism in the procurement procedure and related responses.</p> <p>At the same time, Operational Procedure PO 01 / D.C.R.P.S. Elaborating the answers to the requests formulated under Law no. 544/2001 and the Operational Procedure 06 / D.G.J.R.P.C Elaboration of the answers to the requests formulated on the basis of</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>Law no. 544/2001 and the Government Ordinance no. 27/2002, have been updated.</p> <p>In order to improve the access of interested persons to information of public interest, ANI is in the process of centralizing statistical information on individuals who have been found to have integrity incidents, which will be available in the separate section on its website.</p>
3.3.3.	Modernizing communication tools	January 2017 / Permanent measure assessed on an annual basis	<p>Updating the ANI's presentation brochure</p> <p>Using newsletter and social media tools</p> <p>Using info graphs to present relevant information</p>	Lack of budgetary resources	ANI External supplier	<p>Partially implemented</p> <p>On the 10th anniversary of the establishment of the National Integrity Agency, ANI has produced a brochure summarizing the activity and the results achieved in the 10 years of fighting corruption through administrative means.</p> <p>The brochure includes detailed information on the legal framework of operation, institutional organization, administrative capacity, evolution of the wealth and interest statements system, the results obtained in identifying, preventing and sanctioning integrity incidents, the work in the field of export of best practices at international level, and the main challenges and strategic objectives for the coming years. The brochure can be consulted electronically on the Agency's website, both in Romanian and English. At the same time, ANI will disseminate the Brochure among institutions and organizations in Romania as well as internationally.</p> <p>In 2017, two infographics there were elaborated on <i>Conflicts of interest and incompatibilities among MPs</i>, as well as the <i>submission of statements of wealth and interests in electronic format</i>.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte Evaluation as of 31.12.2017
						<p>In order to improve the level of knowledge and understanding of the Agency's activity at the local and regional level, ANI has used social media platform (Facebook) for the dissemination of the published public information materials. At the same time, the Agency has published on the Facebook page information about the main events and projects it has been part of</p> <p>At the end of 2017, the newsletter server was shut down for an update.</p>

General objective no. 4: Ensuring Transparency

4.1 Ensuring transparency in respect of declarations of assets and interests

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
4.1.1.	Increasing the number of people submitting assets and interest statements in electronic format	December 2019	20.000 assets and interest statements submitted in electronic format	Persons refusing to submit statements in electronic format Lack of resources	ANI Persons that are obliged to submit the Assets statement/ Interest statement Public institutions and authorities	<p>Partially implemented</p> <p>During 2017, 13,497 declarations of assets and interests were filled in electronically.</p> <p>Training sessions on optimizing the process of filling in wealth and interest statements in electronic format</p> <p>Between May 24 and 26, 2017, ANI has organized several training sessions dedicated to optimizing the process of filling in wealth and interest declarations by using online and offline electronic forms.</p> <p>On this occasion, about 300 people were trained in optimizing the process of filling in wealth and interest statements.</p> <p>At the same time, there were released the Guide to fill in assets and interests statements as well as an infographic on the submission of declarations of assets and interests in electronic format in order to facilitate the process of submitting and filling in the statements in electronic format.</p>
4.1.2.	Ensuring continuity on public declarations of assets and interests and helping	2018	Re launched tender procedure	Lack of finance resources	ANI	<p>Implemented</p> <p>During the entire period of 2017, the continuity in the publication of the wealth and interest statements on</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
	institutions in a transparent presentation of declarations of assets and interests		Awarded contract			the institution's website was ensured, based on a framework agreement on archiving and other related services, no. 4045 / 12.03.2014, services which include, among others, both the retrieval and processing of statements, as well as the hosting of the site and Portal.

4.2 Update ANI web page

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
4.2.1.	Developing the English version of the Website	January 2017	Translated sections of ANI web page	Lack of budget resources	ANI External supplier	Not implemented
4.2.2.	Constantly completion of sections	Permanent measure assessed on an annual basis	Permanently updated sections	Lack of human resources	ANI	<p>Implemented</p> <p>Based on an internal note on the methodology for updating the content of the sections on the Agency's website, each department responsible for a section / subsection requests, whenever necessary, the publication of information and data.</p> <p>The sections available on the Agency's website are permanently updated, as follows:</p> <ul style="list-style-type: none"> • <i>Definitive incompatibilities - 3-year ban;</i> • <i>Files in court;</i> • <i>Definitive and irrevokable judgments of the courts;</i> • <i>Minutes for sanctioning contraventions;</i> • <i>Legislation views;</i> • <i>Organization;</i> • <i>Budget and public procurement;</i> • <i>Statements of Wealth;</i> • <i>Legislation;</i> • <i>Reports and Audit;</i> • <i>A.N.I careers;</i> • <i>Cooperation;</i> <p>At the same time, in 2017, the <i>Guidelines for filling in Wealth and Interests Statements</i>, as well as the</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p><i>Guidelines on Incompatibilities and Conflicts of Interest</i>, which includes a Q&A section, were also updated and available on the Agency's website.</p> <p>At the same time, the <i>Guide to filling in the integrity form</i>, available on the Agency's website, has been developed in the special section PREVENT.</p> <p>Furthermore, 75 public information materials were posted on the Agency's website.</p>
4.2.3.	Publication of final and irrevocable decisions issued by courts on matters regarding wealth confiscation, conflicts of interest and incompatibilities	Permanent measure assessed on an annual basis	Number of published decisions	N/a	ANI	<p>Not implemented</p> <p>Case law on confiscation of assets, conflicts of interest and incompatibilities is being processed on the ANI website, that is, a number of 298 final and irrevocable judgments were communicated to the Agency in 2017. However, they have not been posted yet on the Agency's website.</p>

General objective no 5: Cooperation with interinstitutional and non-institutional entities

5.1 Cooperation at national level

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
5.1.1.	Disseminating the concept of integrity in schools	Permanent measure assessed on an annual basis	No. of common events organized No. cooperation agreements initiated	Lack of budgetary resources Lack of availability of human resources	ANI Educational institutions	<p>Implemented</p> <p><u>The Postgraduate Program "Public Integrity and Anti-Corruption Policies"</u></p> <p>Based on the partnership between the National Integrity Agency and the Faculty of Political, Administrative and Communication Studies (FSPAC) of the Babeş - Bolyai University of Cluj - Napoca, in January and March, an expert from ANI he held two lectures in the postgraduate program "<i>Public Integrity and Public Policy Anticorruption</i>".</p> <p>Thus, the expert of the Agency shared with the learners the experience gained in identifying incompatibilities and conflicts of interest, the method for filling in the wealth and interest statements, wealth assessment, the effectiveness of public policy strategies and public integrity policies</p> <p>On October 20, 2017, the President of the Agency participated in the debate held in Cluj - Napoca on the occasion of graduating the postgraduate course "<i>Public</i></p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p><i>Integrity and Public Policy Anticorruption"</i> by the first two classes of the programme.</p> <p>Based on the partnership between the National Integrity Agency and the Faculty of Political, Administrative Studies and Communication (FSPAC) the programme was launched in October 2016 at Babeş - Bolyai University in Cluj - Napoca and aims to increase the level of education among certain groups of persons - civil servants, teachers, students, in order to prevent conflicts of interest in public administration.</p> <p style="text-align: center;"><u>Collaboration protocol with the National Institute of Magistracy</u></p> <p>In 2017, ANI signed a collaboration protocol with the National Institute of Magistracy, with the main objectives of organizing initial training sessions for judicial auditors and continuous development of judges and prosecutors, as well as integrity inspectors, on subjects of common interest, namely ensuring the dissemination of informative materials on issues of conflict of interest, incompatibilities, ensuring integrity in the exercise of public dignities and functions, and preventing institutional corruption against judicial auditors, judges and prosecutors.</p> <p style="text-align: center;"><u>Cooperation protocol with the "Alexandru Ioan Cuza" Police Academy</u></p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						In June 2017, the President of ANI and the Rector of the "Alexandru Ioan Cuza" Police Academy signed a cooperation protocol between the two institutions, the main objectives being the promotion of the integrity concept among the students in the study programs conducted at the level of the Police Academy "Alexandru Ioan Cuza", as well as increasing the level of education in the field of public integrity of the staff within the Academy by organizing conferences, seminars or roundtables.
5.1.2.	Fostering of cooperation with public institutions and authorities, as well as with the associative structures of local authorities	Permanent measure assessed on an annual basis	No. of common events organized	Lack of availability of budgetary and human resources	<p>National Integrity Agency</p> <p>National Union of County Councils in Romania</p> <p>Association of Municipalities in Romania</p> <p>Association of Romanian Towns</p>	<p>Implemented</p> <p>During the reporting period, the Agency carried out cooperation activities with the public institutions and authorities as well as with the associative structures of the local public administration authorities, as follows:</p> <p style="text-align: center;"><u>PREVENT Seminar</u></p> <p>In October 2017 ANI along with the Expert Forum Association organized a training seminar in Cluj-Napoca on the PREVENT program, which aims at the mandatory requirement of filling in the integrity forms related to the award procedures, as well as incompatibilities and conflicts of interest in procurement procedures.</p> <p>The event brought together about 50 representatives of public institutions at local level and aimed to support the activity of contracting authorities for a better understand of their obligations with regard to the ex-</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
					Association of Communes of Romania	<p>ante verification system of public procurement, PREVENT and the procedures that this program implies.</p> <p><u>Training sessions on optimizing the process of completing wealth statements and electronic interests</u></p> <p>Between May 24 and May 26, 2017, ANI has organized several training sessions dedicated to optimizing the process of completing wealth and interest statements by using online and offline electronic forms.</p> <p>On this occasion, approximately 300 people were trained in optimizing the process of filling in wealth and interest statements.</p> <p><u>Project for Early identification and prevention of conflicts of interest in the local public administration</u></p> <p>On May 22, 2017 ANI and the Institute for Public Policies (IPP) organized a debate on the launch of the national poll <i>Perceptions and Attitudes of the People on Conflict of Interests at the central and local Level in Romania</i> - the first national survey on Romanian perceptions on conflicts of interest, developed within the project <i>Early identification and prevention of conflicts of interests in the local public administration</i>, implemented through the Swiss-Romanian Cooperation Program. The event was attended by the representatives of the Legal Commissions in the</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>Romanian Parliament, the diplomatic environment and the central and local public administration.</p> <p>Based on the project, the Agency representatives participated in a series of regional debates organized in 7 counties in the country, Brasov, Iasi, Brăila, Sibiu, Cluj, Dolj and Timiș from October to November 2017, attended by approximately 200 secretaries of the Territorial Administrative Units, as well as civil servants with responsibilities in the prevention of corruption within ATUs.</p> <p>The sessions took place at the premises of the Prefect Institutions and ANI representatives presented the PREVENT system of ex-ante verification in order to prevent the conflict of interests in the procedure of awarding the public procurement contracts.</p> <p>These activities were carried out under the <i>Joint Task Mechanism on Mapping Risk Areas in Conflict of Interest in Romania</i>, initiated in collaboration with the Secretariat Associations at the level of the cities and counties.</p> <p>Cooperation protocol with the Ministry of Culture</p> <p>In December 2017, ANI concluded a cooperation protocol with the Ministry of Culture and National Identity, with the main objective of strengthening the cooperation and coordination of efforts at the institutional level, in order to increase the efficiency of</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>the mechanisms for preventing and combating corruption in the exercise of public functions and dignities.</p> <p>Based on this protocol, experts from the Agency will participate in the training of staff within the Ministry, as well as in its subordinated institutions, by conducting prevention and awareness activities on integrity incidents.</p>
5.1.3.	Develop and strengthen partnerships with NGOs	Permanent measure assessed on an annual basis	<p>No. of common events organized</p> <p>No. of cooperation agreements initiated</p>	Lack of availability of budgetary and human resources	ANI NGOs	<p>Implemented</p> <p>Project for Early identification and prevention of conflicts of interest in the local public administration</p> <p>On May 22nd, 2017, ANI and the Institute for Public Policy (IPP) organized a debate on the launch of the national poll <i>Perceptions and Attitudes of the People on Conflict of Interest at the central and local Level in Romania</i> - the First National Opinion Survey on Romanian Perceptions on conflicts of interest, realized within the project <i>Early identification and prevention of conflicts of interests in the local public administration</i>, implemented through the Swiss-Romanian Cooperation Program.</p> <p>The event was attended by representatives of the Legal Commissions of the Romanian Parliament, of the diplomatic environment and of the central and local public administration.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>Based on the project, the representatives of the Agency participated in a series of regional debates organized in 7 counties in Brasov, Iasi, Brăila, Sibiu, Cluj, Dolj and Timiș from October to November, attended by approximately 200 secretaries who are part of territorial-administrative units, as well as civil servants with responsibilities in the prevention of corruption within ATUs.</p> <p>The sessions took place at the premises of the Prefect institutions and the representatives of the Agency presented the PREVENT system of ex-ante verification in order to prevent the conflict of interests in the procedure of awarding the public procurement contracts.</p> <p>The project "Strengthening the integrated system for identifying, preventing and fighting conflicts of interest in the Republic of Moldova through interinstitutional cooperation and partnership with the actors with relevant competences in the field"</p> <p>Within the project "<i>Strengthening the Integrated System for Identifying, Preventing and Combating Conflicts of Interests in the Republic of Moldova through Interinstitutional Co-operation and Partnership with the Competent Players in Romania</i>", carried out by the National Integrity Agency in partnership with the Institute for Public Policies, two ANI experts participated in May 2017 as lecturers at the training course addressed to the staff of the</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>National Integrity Authority of the Republic of Moldova. At the same time, in October, in Chisinau, Republic of Moldova, the event organized on finalizing the project took place and was attended by two experts from the Agency.</p> <p>The project, funded by the Romanian Ministry of Foreign Affairs, through UNDP, took place based on the partnership agreement concluded in July 2016 between the National Integrity Agency and the Institute for Public Policies.</p>
5.1.4.	Providing viewpoints to entities that have legislative initiative regarding drafting laws related to ANI's objects of activity	Permanent measure assessed on an annual basis	No. of viewpoints provided	Refusal of the authorities to seek viewpoints from ANI	ANI DRP	<p>Implemented</p> <p>The National Integrity Agency constantly expresses its views on the draft normative acts regulating its activity.</p> <p>In 2017, ANI has expressed its point of view on 10 occasions to entities that have a legislative initiative regarding the draft laws related to the Agency's object of activity, as follows:</p> <p>LAW NO. 161/2003</p> <p>Negative point of view on the modification of the Law no. 161/2003 on certain measures for ensuring transparency in the exercise of public dignities, public functions and business environment, preventing and sanctioning corruption (Plx 528/2017);</p> <p>Negative point of view on the modification of the Law no. 161/2003 on certain measures for ensuring</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>transparency in the exercise of public dignities, public functions and business environment, preventing and sanctioning corruption (Plx 387/2016).</p> <p>LAW NO. 176/2010</p> <p>Negative point of view on the modification of the Law no. 176/2010 on integrity in the exercise of public functions and dignities, for amending and completing the Law no. 144/2007 regarding the establishment, organization and functioning of the National Integrity Agency, as well as for the modification and completion of other normative acts (Plx. no. 482/2017).</p> <p>OTHER NORMATIVE ACTS</p> <p>Point of view lacking any observations on the legislative proposal to amend the Competition Law no. 21/1996 (Bp. 481/2017);</p> <p>Negative point of view on amending and completing the Law no. 215/2001 of the local public administration, with subsequent amendments and completions and of Law no. 393/2004 on the Statute of local elected representatives, as subsequently amended and supplemented (Plx. no. 108/2017);</p> <p>Point of view lacking any proposals and / or observations regarding the draft law on the Investor Compensation Fund;</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>Favorable point of view with observations on the draft law regarding the status of the labor inspector (L523/2017);</p> <p>Point of view lacking any proposals and / or observations on the legislative proposal for completing the Law no. 96/2006 regarding the Statute for Deputies and Senators (Plx No 148/2017), since the National Integrity Agency has no legal competence to rule on the existence of the constituent elements of the offense of conflict of interest;</p> <p>Favorable point of view on the draft Law amending and supplementing the Government Ordinance no. 119/1999 regarding intensive managerial control and preventive financial control;</p> <p>Point of view lacking any proposals and / or observations on the draft Ordinance for amending and completing the Law no. 95/2006 on health reform.</p>
5.1.5.	ANI involvement in implementing the objectives and measures of National Anticorruption Strategy	Permanent measure assessed on an annual basis	<p>No. of common activities</p> <p>At least two experts appointed to assist the Technical Secretariat</p> <p>No. of meetings</p>	Lack of availability of human resources	ANI	<p>Implemented in 2017</p> <p>Two representatives from the institution, responsible for implementing the Strategy, were appointed in 2016.</p> <p>At the beginning of 2017, the National Integrity Agency adopted the Declaration on the Adherence to the Values, Objectives, Principles, Measures and</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
			No. of evaluation missions involving experts ANI			<p>Monitoring Mechanism of the <i>National Anticorruption Strategy 2016-2020</i>.</p> <p>At the same time, an internal assessment of the risks related to corruption has been developed. As a result, an integrity plan, approved internally, by ANI, has been developed, comprising four distinct sections, according to the general objectives assumed in the document:</p> <p>Internally, based on previously identified corruption risks, objectives and measures for their management have been outlined.</p> <p>Externally, in order to combat, prevent corruption and educate the target audience, the objectives and measures of the Strategy for preventing and sanctioning conflicts of interest of the incompatibilities and unjustified assets of the National Integrity Agency were taken over.</p> <p>In the third part of the integrity plan, there were identified the objectives and measures included in the National Anticorruption Strategy. 2016 – 2020 to which the Agency can contribute actively and effectively. In addition to those mentioned, ANI may also contribute to other objectives, depending on the specific requirements arising from the implementation of the S.N.A.</p> <p>In the fourth part of this plan, the objectives and measures aimed at minimizing or eliminating the</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>specific risks and vulnerabilities of the National Integrity Council are described.</p> <p>In this context, ANI representatives participated in two meetings of the <i>Cooperation Platform of Independent Authorities and Anticorruption Institutions</i> in May and December of 2017, which aimed to establish the following steps in fulfilling the objectives set by the S.N.A., but also the participants' presentation of the methodology to monitor the implementation of the National Anticorruption Strategy.</p> <p>In June 2017, the National Integrity Agency submitted the first report on the stage of implementation of the measures provided by the National Anticorruption Strategy 2016-2020.</p> <p>A thematic evaluation mission was organized at the ANI headquarters in October 2017 on the three topics subject to evaluation: Gifts reporting process, Whistleblowing in public interest, and Sensitive Functions. A first draft containing the recommendations made by technical secretary experts from the SNA was sent to the Agency.</p> <p>Furthermore, in October 2017, ANI together with an NGO partner applied for funding to implement a project targeting OS 2.2. - <i>Increasing the transparency, ethics and integrity within the public authorities and institutions of SNA</i> through the Operational Capacity Administrative Program. The application is still being evaluated.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
5.1.6.	Harmonization and clarification of the legal framework on incompatibilities	June 2018	Working group established No. of proposals submitted Legislative changes made	Legislative instability Legislative delay The dilution of the existing legislative framework	ANI MJ	<p>Partially implemented</p> <p>Considering the initiative to align legislation on conflicts of interest and incompatibilities with regard to public office, a working group for the drafting of the administrative code was set up at the level of the Ministry of Regional Development, Public Administration and European Funds. In 2016, two experts from the Agency were included into this working group, participating in a series of meetings to make changes to current legislation. ANI representatives participated in 5 working meetings, and made 10 proposals to amend the legislation.</p> <p>In 2017, the National Integrity Agency submitted proposals and comments on the Romanian Administrative Code, to the Ministry of Regional Development, Public Administration and European Funds and the Department for Relations with the Parliament. At the end of 2017, the legislative proposal on the "Administrative Code of Romania" was registered with the Senate for debate, and subsequently sent for approval to the Legislative Council and for requesting a point of view to the Government.</p> <p>As for the points of view expressed by ANI on legislative drafts under the parliamentary procedure and requested by the Ministry for Relations with Parliament, in 2017 at the level of ANI 12 opinions on legislative proposals were formulated and submitted.</p>

5.2 Cooperation at international level

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
5.2.1.	Agency involvement in technical assistance projects	Permanent measure assessed on an annual basis	No. of activities No. of experts appointed	Lack of resources Lack of availability of experts	ANI MAE Civil society	<p>Implemented</p> <p>In May, the National Integrity Agency in partnership with the Institute for Public Policies rolled out the project entitled "Strengthening the integrated system for identifying, preventing and combating conflicts of interests in the Republic of Moldova by means of interinstitutional cooperation and partnership with competent Romanian stakeholders". Within the context of this project,</p> <p>A.N.I experts participated as lecturers at the training course addressed to the staff of the Moldavian "National Integrity Authority". Therewith, in October, in Chisinau (Republic of Moldova), another event was organized on finalizing the previously mentioned project. Two experts from the Agency took part at it.</p> <p>The project, funded by the Romanian Ministry of Foreign Affairs through UNDP, was based on the partnership agreement concluded in July 2016 between the National Integrity Agency and the Institute for Public Policies.</p> <p>Also in May 2017, at the invitation of the Ministry of Foreign Affairs, an ANI delegation participated at the fourth meeting of the Romania-Moldova Intergovernmental Commission for European</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						Integration, which took place in Chisinau, (Republic of Moldova). On this occasion, the delegation of ANI presented the summary of the discussions held within the Sectoral Groups (ANI Romania - ANI of the Republic of Moldova). These discussions referred namely to the future collaboration for assisting the National Integrity Authority of the Republic of Moldova in elaborating the Procedural Handbook for: wealth and personal interest control and compliance with the legal framework of conflicts of interest. In addition, assistance is also going to be provided in elaborating the "Conflict of Interest Prevention Guide".
5.2.2.	Continuing exporting best practices referring to Romanian system of declaration of assets and interests	Permanent measure assessed on an annual basis	No. of activities	Lack of resources Lack of availability of experts	ANI MAE Civil society	Implemented In 2017, the National Integrity Agency was actively involved in "exporting good practices" concerning the Romanian "asset and interest" declaration system, as follows: In the beginning of April 2017, at the invitation of the World Bank, an Integrity Inspector participated, as a speaker, at the "World Bank Workshop on Effective Asset Declaration". In the context of a meeting with the Cambodian Anti-Corruption officials, one of the Agencies representatives gave a presentation on A.N.I's activity portraying its good

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>practices. This was done by sharing specific cases identified by A.N.I In addition, subjects such as the Romanian integrity framework, unjustified wealth and compliance with the legal framework on incompatibilities and conflicts of interest were touched upon and brought up for discussion.</p> <p>In April, at the invitation of the World Bank, an integrity inspector attended the "World Bank Workshop on Effective Asset Declaration" as a speaker, in Ulan Bator, Mongolia. During the debate, the Agency's expert presented the activity of ANI in relation with the prerogatives of the Independent Anti-Corruption Authority of Mongolia.</p> <p>At the same time, a ANI representative presented the Agency's work done on evaluating significant differences, conflicts of interest and incompatibilities. This was done by presenting ANI specific case studies as well by presenting/familiarizing one with the methods employed to sanction individuals or entities that violated the Romanian Integrity legislation. During these meetings, wealth and interest statements were showcased/featured (both in electronic and hard-copy format) as well as the mechanism used for preventing conflicts of interest when it comes to the procedure of awarding public procurement contracts (PREVENT).</p> <p>Also in April, in collaboration with the National Anticorruption Directorate, a delegation made up of</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>Lithuanian Special Investigation Service representatives, paid a working visit to the A.N.I headquarters. On this occasion, Romanian integrity inspectors presented the general framework of the Agency's activity, the internet portal containing the Romanian wealth and interest statements, as well as the mechanism for preventing conflicts of interest in the procedure of awarding public procurement contracts (PREVENT).</p> <p>At the beginning of May 2017, at the invitation of the World Bank, ANI leadership attended the "International Experiences in Data Analytics and Financial Disclosure Administration to Promote Public Sector Integrity", Seminar. This seminar took place in Mexico.</p> <p>On this occasion, the ANI President held a presentation at the session entitled "Financial Disclosure Systems: Data-Driven Management and the Use of Risk-Based Approaches for Prevention and Detection". During this session, he spoke about the development of the institutional integrity system. The Secretary General of ANI held a presentation during the "International Developments in Data Analytics in Support of Public Integrity" session, where he spoke about the prevention of corruption by making use of electronic tools.</p> <p>In June 2017, at the invitation of the Organization for Economic Cooperation and Development (OECD), an expert from ANI participated as a speaker at the</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>Conference on "Assessing the Implementation and Effectiveness of Systems for Disclosure of Interests and Wealth by Public Officials", held in Tbilisi, Georgia.</p> <p>On this occasion, the Agencies representative held a presentation titled "Building the Institutional Integrity System: Declaring goods and policies to manage conflicts of interest, incompatibilities and unjustified wealth". This presentation was held within the context of the "Assessing the Implementation and Effectiveness of Interests and Wealth Disclosure Systems Pursuing Dual Goals" session.</p> <p>Also in June 2017, ANI, in partnership with the World Bank Office from Mexico, organized a visit to Romania for representatives of several Mexican institutions that have a role in preventing and fighting corruption. This visit took place in the context of a comprehensive anticorruption system reform process that is currently underway in this country.</p> <p>On the visit to the ANI headquarters, the delegation from Mexico had a meeting with the leadership of the Agency, as well as thematic meetings with integrity inspectors. During these meetings, the Mexican delegation was presented with the Romanian system of wealth and interest statements, how institutional capacity building is being made and with ways to identify, prevent and sanction conflicts</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>of interest or cases of incompatibility. In the context of these meetings, the PREVENT Information system was also showcased. In addition, the experts from Mexico met with representatives of other institutions that have a role in preventing and fighting corruption at national level.</p> <p>In July 2017, the Agency hosted a working visit for a delegation of two Libyan experts from the Prime Minister's cabinet and three Egyptian prosecutors from the General Prosecutor's Office. During the meeting held within the context of the working visit, integrity inspectors presented the general framework of the Agency's activity, the Romanian portal of wealth and interest statements and the mechanism used for preventing conflicts of interest in the procedure of awarding public procurement contracts (PREVENT).</p> <p>Also in July, on the initiative of the Institute of Public Policies, a delegation made up of representatives of the National Integrity Authority of the Republic of Moldova paid a working visit at the headquarters of the National Institute of Public Policy. On this occasion, the representatives of the Agency presented the role and results of ANI in the control of wealth statements, conflicts of interest and incompatibilities, as well as the work carried out within the Legal Directorate General, Public Relations and Communication and the Information Technology Services.</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>In August 2017, at the suggestion of the World Bank, an expert from the Agency participated as a speaker at the "Stolen Asset Recovery Initiative Mission on Asset Declarations" workshop in Kampala, Uganda. During this event, the representative of the Agency held a presentation on the activity of ANI in assessing unjustified wealth, but also in preventing and combating corruption through administrative means. The event was organized by the World Bank in collaboration with the United Nations Office on Drugs and Crime (UNODC) through the Stolen Asset Recovery Initiative (StAR). This was all part of the technical assistance program provided to the Ugandan Government Inspectorate.</p> <p>Between the 1st and the 2nd of November 2017, at the invitation of the United Nations Development Program (UNDP) Bureau of Turkmenistan, an ANI representative participated in the Workshop "Modern Trends in the Civil Service and Anti-Corruption Reforms" held in Ashgabat, Turkmenistan. On this occasion, the representative of ANI presented a general overview of the legal framework that governs the activity of the National Integrity Agency, which concerns the legal status of incompatibilities, conflicts of interest, and wealth and interest statements.</p>
5.2.3.	Cooperation in activities belonging to	Permanent measure assessed on an	No. of activities	Lack of availability of experts	ANI	Implemented

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
	organizations of which ANI is a part of	annual basis			Regional / international organizations	<p><u>European Partners Against Corruption Network (EPAC / EACN)</u></p> <p>In November, the Secretary General of the Agency participated at the 17th EPAC / EACN Professional Conference and General Assembly in Lisbon.</p> <p>The 2017 conference, hosted and organized by the Portuguese Internal Affairs Inspectorate (IGAI), brought together about 160 delegates from more than 30 member states of the EPAC / EACN network. Plenary sessions addressed issues of interest such as international and European developments, corruption measurement, the admissibility of electronic evidence and CCTV, the abusive use of databases by police officers, integrity and anti-corruption efforts, and violation of official secrecy.</p> <p>During the General Assembly of 17 November, there were elected two vice-presidents, namely Mr. Mati Ombler, Head of the Corruption Crimes Bureau from Estonia, and Mr. Jack Vissers from the Belgian Standing Police Monitoring Committee. The French Anti-Corruption Agency (AFA) and the Higher Authority for Transparency in Public Life (HATVP) have also become full members of the EPAC / EACN Network. The General Assembly ended with the adoption of the Lisbon Declaration.</p> <p><u>Organization for Economic Cooperation and Development (OECD)</u></p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>In March 2017, at the invitation of the OECD, the President of ANI, together with the Secretary General, attended the "OECD Global Anti-Corruption & Integrity Forum" in Paris. On this occasion, the President of the Agency participated, as a speaker, in the Panel Discussion entitled "Benefits for Friends? Preventing Policy Capture & Promoting Public Interest in Policy Making".</p> <p>The Forum was attended by about 1,000 representatives from over 115 states, including government leaders, business experts, as well as civil society and academic leaders. The Forum discussed issues such as: the key role that integrity holds in today's society, the importance of education on integrity concepts, and the means by which these elements contribute to sound public policies in the context of sustainable economic growth.</p> <p>Furthermore, in June 2017, at the invitation of the Organization for Economic Co-operation and Development (OECD), an expert from ANI participated as a speaker at the Conference on "Assessing the Implementation and Effectiveness of Systems for Disclosure of Interests and Assets by Public Officials".</p> <p>On this occasion, the Agency representative held a presentation entitled "Building the Institutional Integrity System: Declaring Property and Policies to Manage Conflicts of Interest, Incompatibilities and Unwritten Assets" at the Session on the topic</p>

Level	Action	Deadline	Evaluation indicators established by ANI	Risks	Responsible institutions	Deloitte evaluation as of 31.12.2017
						<p>"Assessing the Implementation and Effectiveness of Interests and Asset Disclosure Systems Pursuing Dual Goals ".</p> <p>The conference provided a forum for debates on the main international stakeholders responsible for managing, implementing, enforcing legislation and evaluating the declarations of assets and interest, representing a good opportunity for facilitating the exchange of good practices among participating states.</p> <p><u>World Bank</u></p> <p>The cooperation with the World Bank during the reference period aimed to involve the Agency's experts in a series of activities in order to present to the similar institutions from abroad the institutional model of A.N.I., as follows:</p> <p>In April 2017, at the World Bank's invitation, an integrity inspector participated as a speaker at the "World Bank Workshop on Effective Asset Declaration", which took place in Cambodia. During the work meeting with the Anti-Corruption Unit officials from Cambodia, the Agency representative held a presentation on A.N.I.'s activity and disseminated good practices by sharing cases identified by the Agency, with interventions of topics such as the integrity framework in Romania, unjustified wealth, and compliance with the legal</p>

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						<p>framework on incompatibilities and conflicts of interest.</p> <p>In addition, in April, at the invitation of the World Bank, an integrity inspector attended „<i>The World Bank Workshop on Effective Asset Declaration</i>” as a guest speaker. During the workshop held in Ulan Bator (Mongolia), the expert presented the activity of the Agency in relation to the prerogatives attributed to the Independent Anti-Corruption Authority of Mongolia.</p> <p>At the same time, A.N.I.’s representative, presented the Agency’s activity on evaluating significant differences, conflicts of interest and incompatibilities through the means of several case studies. The expert presented also the sanction measures of in individuals/entities who violated the Romanian law of integrity.</p> <p>During these meetings, wealth and interest statements were presented (both in electronic and hard-copy format) as well as the mechanism used for preventing conflicts of interest when it comes to the procedure of awarding public procurement contracts (PREVENT).</p> <p>In the beginning of May, at the invitation of the World Bank, the Agency leadership attended a seminar on "<i>International Experiences in Data Analytics and</i></p>

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						<p><i>Fianancial Disclosure Administration to Promote Public Sector Integrity".</i></p> <p>On this occasion, during the seminar session "<i>Financial Disclosure Systems: Data-Driven Management and the Use of Risk-Based Approaches for Prevention and Detection</i>", the President of the Agency delivered a presentation about the development of the institutional integrity system; also, during the session "<i>International Developments in Data Analytics in Support of Public Integrity</i>", the Secretary General of ANI delivered a presentation on preventing corruption by making use of electronic tools.</p> <p>The seminar gathered around 80 international representatives responsible for anti-corruption reform in the following fields: ethics, conflict of interest, wealth declaration, public procurement or internal control, thus providing a forum for debates on international practices and emerging trends in wealth declarations, with emphasis on databased approaches and the use of data analytics. The event was organized in the context of a comprehensive process of reforming the current anti-corruption system in Mexico.</p> <p>In addition, in June, the National Integrity Agency, in partnership with the World Bank Office in Mexico, organized a visit to Romania for several Mexican representatives of institutions that have a role in preventing and fighting corruption. This visit took</p>

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						<p>place in the context of a comprehensive process of reforming the current anti-corruption system in Mexico.</p> <p>On this occasion, the Mexican delegation had a meeting with the Agency's leadership as well as several thematic meetings with integrity inspectors who presented the Romanian system of wealth and interest declarations, increasing institutional capacity, identifying, preventing and sanctioning conflicts of interest, and cases of incompatibility. During these sessions, the Agency presented the PREVENT Information. The Mexican experts met also representatives of other institutions that have a role in preventing and fighting corruption at national level.</p> <p>Also in June, an integrity inspector, at the invitation of the World Bank, delivered a presentation during the seminar "<i>World Bank Workshop on Building an Effective Conflict of Interest Regime</i>" which was held in Cambodia. The presentation focused on assessing the legal status of conflicts of interest in relation to the tasks of Anti-Corruption Unit in Cambodia and on describing the mechanism for preventing conflicts of interest when it comes to the procedure of awarding public procurement contracts (PREVENT).</p> <p>At the suggestion of the World Bank, in August 2017, an expert from the Agency participated as a speaker in the workshop entitled "<i>Stolen Asset Recovery Initiative Mission on Asset Declarations</i>" in Kampala (Uganda). During the event, the representative of the</p>

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						<p>Agency presented A.N.I.'s activity for assessing unjustified wealth, but also for preventing and combating corruption through administrative means. The event was organized by the World Bank in collaboration with the United Nations Office on Drugs and Crime (UNODC) through the Stolen Asset Recovery Initiative (StAR), as part of the technical assistance program provided to the Ugandan Government Inspectorate.</p> <p>Additionally, in December, at the invitation of the World Bank, an Agency representative participated, as a guest speaker at the Workshop themed „<i>Stolen Asset Recovery Initiative Mission on Asset Declarations</i>” in Chisinau (Republic of Moldova). During this workshop, the representative of A.N.I held meetings focused on functional aspects of the National Integrity Authority in Moldova, providing expertise within the field of integrity in Romania, relative to that of the Republic of Moldova.</p> <p style="text-align: center;"><u>United Nations Development Programme (UNDP)</u></p> <p>At the invitation of the United Nations Development Program Office (UNDP) in Turkmenistan, a representative of A.N.I. participated in the workshop on „<i>Modern Trends in the Civil Service and Anti-Corruption Reforms</i>”, which took place from the 1st to the 2nd of November 2017 in Ashgabat, Turkmenistan.</p>

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						A.N.I.'s representative presented a general overview of the legal framework for the functioning of the National Integrity Agency that concerned the legal status of incompatibilities, conflicts of interest, and wealth and interest statements.



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