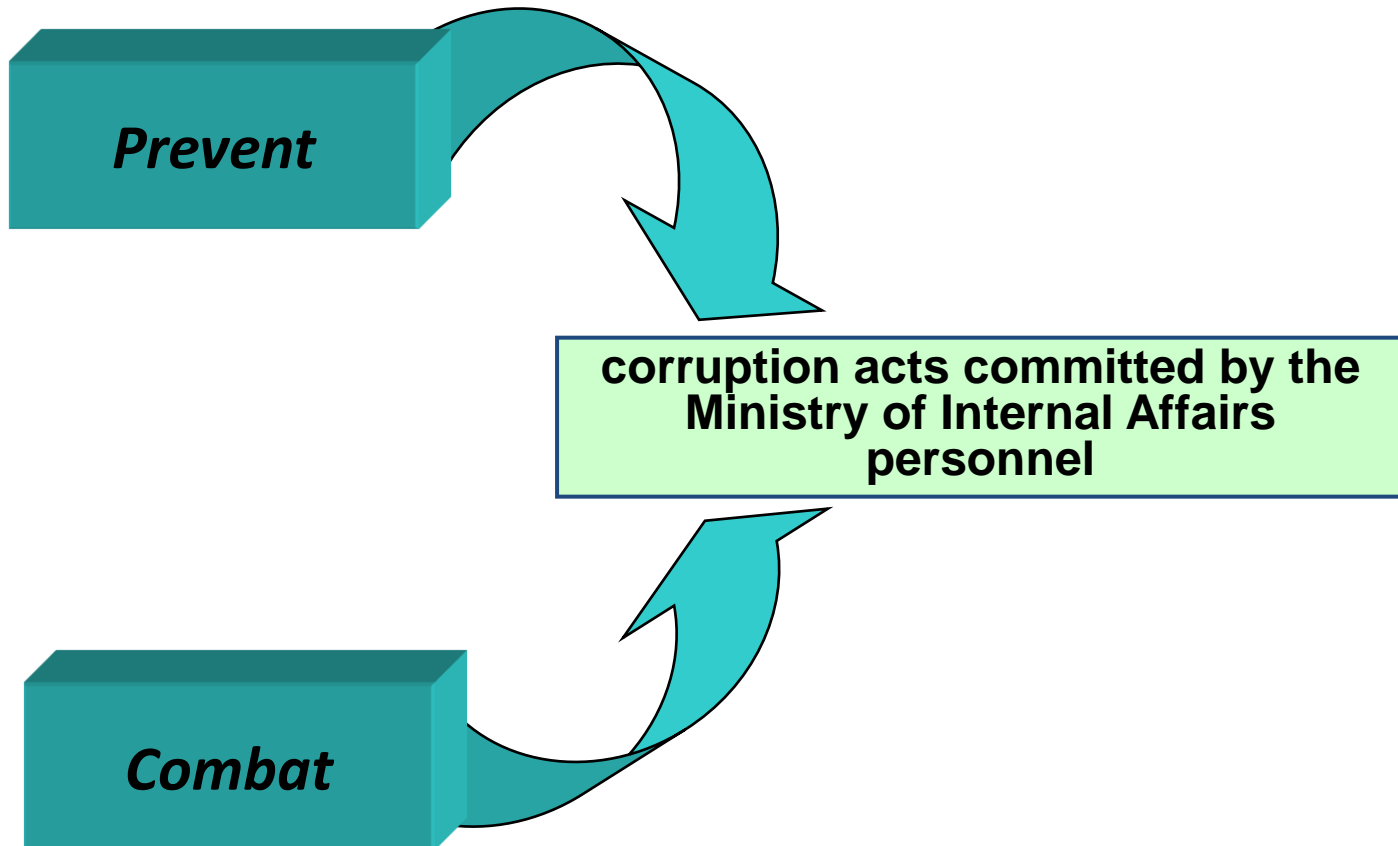
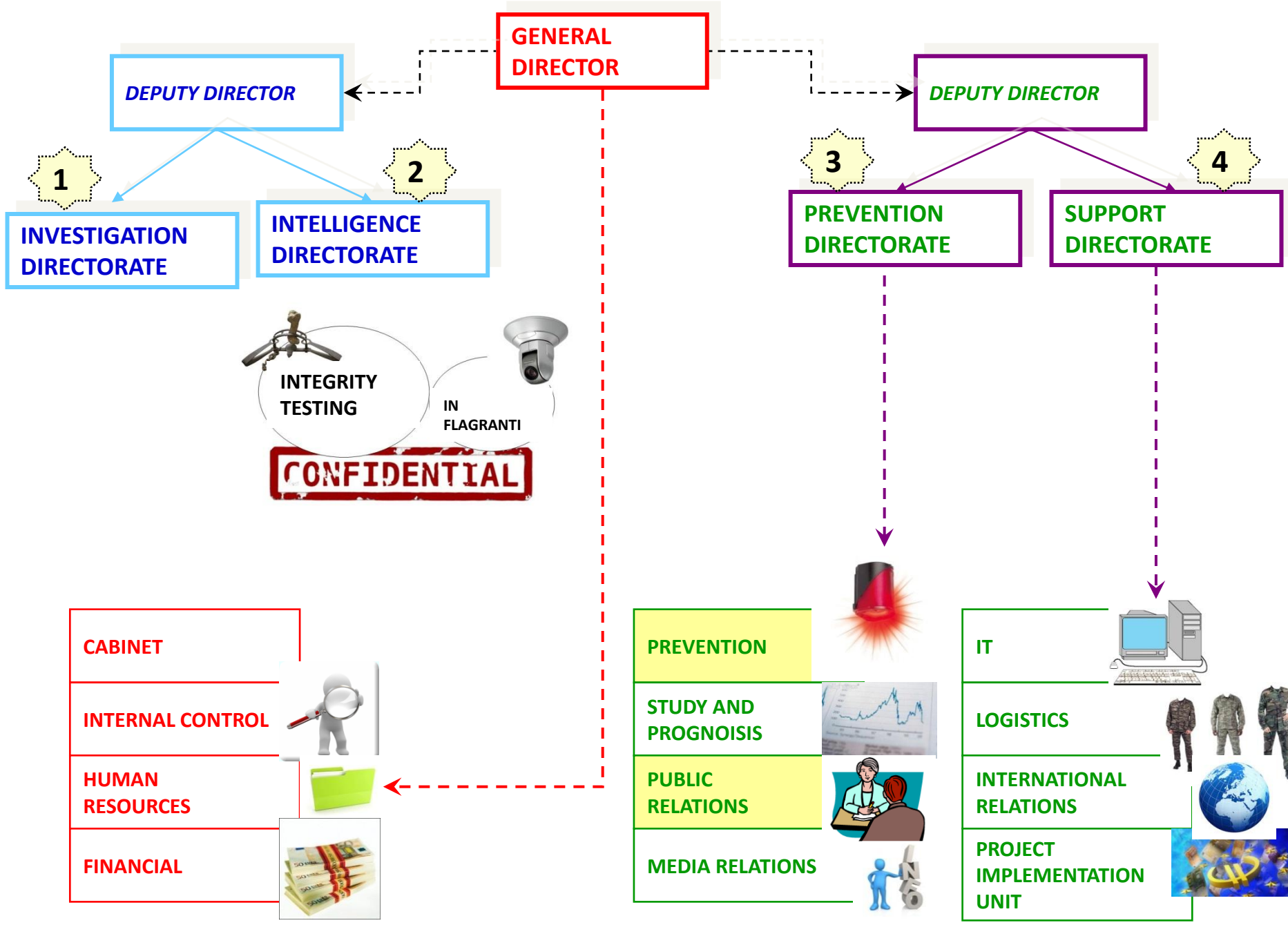




Corruption risk analysis within Romanian Ministry of Internal Affairs

Anticorruption General Directorate

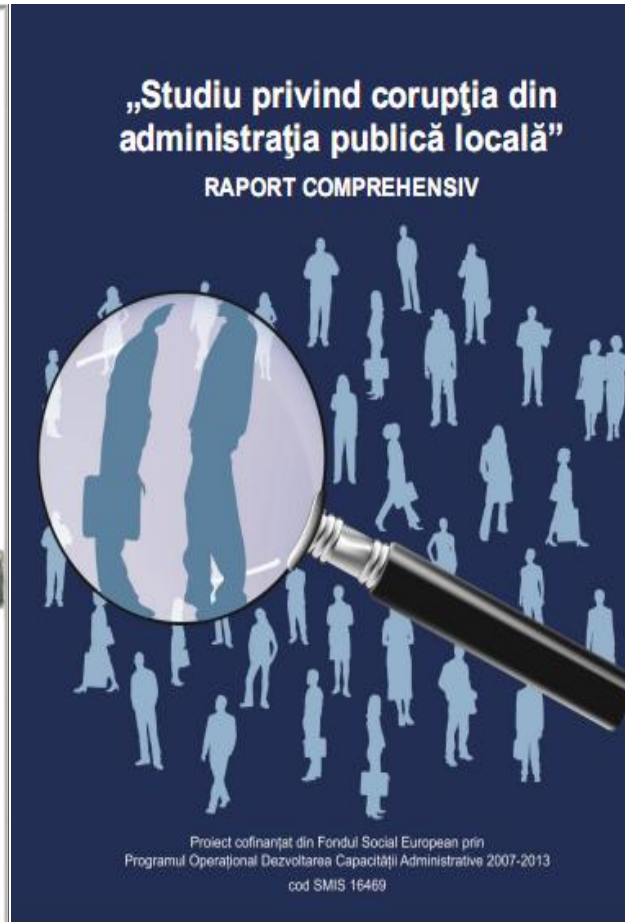




Anticorruption Studies and Prognosis Unit

- develop, implement and update the specific methodology for the identification of risks and vulnerabilities to corruption at the level of the M.I.A
- initiate, plan and organize studies and surveys amongst M.I.A. staff or general population in order to analyse and diagnose institutional corruption
- perform analysis and case studies for acts of corruption committed by M.I.A. staff, in order to identify internal, external and organizational factors that favour corruption
- analysis and diagnosis of structural components of the AGD

Research activities



Identification of risks and vulnerabilities

- *National Anticorruption Strategy 2008-2010*
 - analysis of vulnerabilities that causes or encourages the commission of offenses of corruption in all institutions / structures of the M. of I.A.;
 - policies for corruption prevention in all fields which may involve the exercise of discretionary authority;
- *Methodology for identifying risks and vulnerabilities to corruption*

Identification of risks and vulnerabilities

- **Steps in identifying risks are previous to the Methodology:**
 - **analysis of corruption cases that took place within the M.A.I.**
 - **prevention of corruption activities**
 - **opinion polls conducted among the population and M. of I.A. employees**
 - **complaints received through the anti-corruption line (0800.806.806)**

Methodology for identifying corruption risks and vulnerabilities

The innovations of the Methodology:

- using a standardized analytical framework
- **autonomy (self-assessment of corruption risks)**
- **proactive approach**
- **corruption risks registry (integrity planning)**

The report “Risks and vulnerabilities to corruption”



DIRECȚIA GENERALĂ ANTICORUPȚIE
SERVICIUL STUDII ȘI PROIECȚII ANTICORUPȚIE

Riscuri și vulnerabilități la corupție identificate în activitatea instituțiilor/structurilor Ministerului Administrației și Internelor



BUCUREȘTI
2012

INTRODUCERE	4
I. OBIECTIVE	5
II. METODOLOGIE	5
III. DOMENII GENERALE DE ACTIVITATE	7
1. MANAGEMENTUL RESURSELOR UMANE	7
2. ACTIVITATEA DE PSIHOLOGIE	17
3. INSTITUȚII DE ÎNVĂȚĂMÂNT	22
4. LOGISTICĂ ȘI ACHIZIȚII PUBLICE	26
5. FINANCIAR - CONTABILITATE	37
5.1. ACORDAREA DREPTURILOR BĂNEȘTI ALE PERSONALULUI	38
5.2. ELABORAREA, REPARTIZAREA ȘI UTILIZAREA BUGETULUI	38
5.3. DECONTĂRI CĂTRE FURNIZORII DE BUNURI ȘI SERVICII	39
5.4. PATRIMONIUL INSTITUȚIEI	39
6. COMUNICAȚII ȘI TEHNOLOGIA INFORMAȚIEI	43
7. ASISTENȚĂ JURIDICĂ ȘI CONTENCIOS	46
8. INFORMARE, RELAȚII PUBLICE, RELAȚII CU PUBLICUL ȘI SECRETARIAT	50
8.1. INFORMARE ȘI RELAȚII PUBLICE	50
8.2. RELAȚII CU PUBLICUL ȘI SECRETARIAT	51
Relații cu publicul	52
Secretariat	53
9. COOPERARE ȘI RELAȚII INTERNAȚIONALE	56
10. AUDIT INTERN	58
11. CONTROL	62
12. MANAGEMENT/CONDUCERE	67
13. MANAGEMENT OPERAȚIONAL, PLANIFICARE ȘI MISIUNI	70
14. STRUCTURA DE SECURITATE	72
15. ASISTENȚĂ MEDICALĂ	75
IV. DOMENII SPECIFICE DE ACTIVITATE	78
1. POLIȚIA ROMÂNĂ	78
1.1. ORDINE PUBLICĂ	78
1.2. POLIȚIE RUTIERĂ	88
1.3. STRUCTURILE DE INTERVENȚIE RAPIDĂ	93
1.4. INVESTIGAȚII CRIMINALE	95

The report “Risks and vulnerabilities to corruption”



4. LOGISTICĂ ȘI ACHIZIȚII PUBLICE

Activitatea de logistică și achiziții publice este coordonată de către Direcția Generală Logistică, aceasta îndeplinind atribuții cu privire la elaborarea strategiilor, politicilor și procedurilor unitare în domeniul de competență. Totodată, ea coordonează, îndrumă și controlează activitățile pe linie de planificare logistică, administrare a patrimoniului imobiliar, asigurare tehnică a mijloacelor de mobilitate, armamentului și tehnicii speciale, de dezvoltare tehnică, standardizare și reglementări și protecția modală desfășurate la nivelul tuturor unităților ministerului și asigură suportul logistic pentru unitățile Aparatului Central al Ministerului finanțate de ordonatorul principal de credite, program și pentru unitățile subordonate acestuia care nu dispun de suport logistic propriu.

Figura nr. 4 - Structura organizatorică și funcțională a activității de logistică și achiziții publice din cadrul M.A.I.



RISCURI DE CORUPȚIE

Activitatea de achiziții publice este reglementată și se desfășoară conform O.U.G. nr. 34/2006, fiecare dintre etapele sale succesive putând fi afectată de riscuri și vulnerabilități la corupție, ele provocând adesea blocarea sau întârzierea acesteia.

Planificarea achiziției publice (Elaborarea documentației de atribuire)

1. Alegerea greșită, cu întârziere, a procedurii de atribuire a contractului de achiziție publică, prin interpretarea răuvoitoare a termenilor de valoare a contractului și a celui de cod compartiment achiziției (CPI).
2. Stabilirea ponderii criteriilor ofertei cea mai avantajoasă din punct de vedere economic și/sau avantajarea unor propuneri/caracteristici tehnice ale produselor, în scopul favorizării anumitor agenți economici.
3. Nerespectarea obligației de a preciza în documentația de atribuire, în mod clar și detaliat, factorii de evaluare a ofertei, cu ponderile relative ale acestora, algoritmul de calcul și metodologia de punctare a avantajelor care vor rezulta din propunerile tehnice și financiare prezentate de ofertanți.
4. Direcționarea finalității procedurilor către un singur ofertant, prin impunerea unor condiții discriminatorii în cadrul de sarcini și/sau specificațiile tehnice.
5. Stabilirea de către autoritatea contractantă a unor criterii de calificare și selecție, fără respectarea principiului proporționalității.
6. Omisiunea furnizării tuturor informațiilor în cadrul anunșului de participare la licitație.
7. Divulgarea documentației de atribuire.
8. Acceptarea de oferte dezavantajoase, documentații incomplete și/sau punerea la dispoziție, înainte de termen, a unor date din cadrul de sarcini și/sau de date a achiziției, în scopul favorizării unor participanți la achizițiile publice.

CAUZE

- o exercitarea de presiuni/trafic de influență din partea unor persoane cu funcții administrative și/sau politice pentru încheierea de contracte cu ananșii ofertei;
- o familiaritatea cu ananșii operatorii economici dezvoltată de-a lungul anilor, manifestarea unor interese personale subiective în procesul de evaluare, amele mari alocate achizițiilor, animozitate față de anumite branduri/produse/operatorii economici, erori sau omisiuni pe parcursul evaluării în scopul de a favoriza ananșii ofertei;
- o inexistența unor proceduri unitare privind achizițiile, organizarea licitațiilor și a condițiilor de prospectare a pieței; lacunele procedurale în ceea ce privește exercitarea controlului asupra activităților de prospectare a pieței și achizițiile de bunuri, servicii și lucrări;
- o influențarea angajatăului care face cumpărarea directă sau participă la atribuirea contractelor de achiziție publică, prin diferite căi și mijloace;
- o intenția membrilor comisiei de evaluare și de licitație de a profita folosind materiale necuvenite, pe fondul veniturilor insuficiente comparativ cu activitatea prestată;
- o realizarea unor proceduri competiționale (licitație deschisă, licitație restrânsă, cerere de oferte) și alegerea unor proceduri care constituie excepții de la cele normale (negocierea fără publicarea prealabilă a unei anunș de participare), cu scopul de a nu exista potențiali concurenți pentru contractantul favorit;
- o superficialitatea verificării documentelor emise de către agentul economic, cu intenția de a primi un avantaj material.

O.U.G. nr. 34/2006, privind atribuirea contractelor de achiziție publică, a contractelor de concesiune de lucrări publice și a contractelor de concesiune de servicii¹⁷

Art. 186, alin. 2 „Persoana care asigură finanțarea serviciilor nu trebuie să se afle în situația care determină excluderea din procedura de atribuire, conform prevederilor art. 190”, se recomandă să se facă trimitere explicită pentru subcontractanți în H.O. 925/2006 la art. 186 alin. (2), respectiv art. 190 alin. (2) din O.U.G. 34/2006.

Art. 122, lit. 1 „...valoarea cumulată a contractelor care vor fi atribuite și a actelor adiționale care vor fi încheiate pentru lucrări și/sau servicii suplimentare ori adiționale nu depășește 50% din valoarea contractului inițial”. Există posibilitatea de a favoriza un operator economic, prin atribuirea unor contracte subsecvente și acte adiționale, de valoare foarte mare, la contractul inițial, prin simpla negociere. Se recomandă modificarea cadrului legislativ prin reducerea substațială a procentului de 50% la max. 5% din valoarea contractului inițial, cu aprobarea ordonatorului principal de credite (ca o măsură suplimentară pentru instabilitatea cu ordonatori secundari sau terțari de credite).

Art. 176 precizează că „Autoritatea contractantă are dreptul de a aplica criteriul de calificare și selecție...”, putând fi stabilite cerințe pentru ananșii operatorii economici, însoțite de note justificative superficiale, fără o susținere reală, fiind necesar stabilirea unor cerințe certe, precizate prin cifre exacte, procentuale.

Art. 4, alin. 2 privind „Metoda de calcul și de plată a redevenței se stabilește de către ministrul de resort sau de către organe de specialitate ale administrației publice centrale ori de către autoritățile administrației publice locale”, lipsa unor criterii obiective de calcul și redevenței ducă la subiectivism, fiind necesar stabilirea unor criterii obiective de calcul.

Între art. 36, alin. 1 „Criteriul de atribuire a contractului de concesiune este cel mai mare nivel al redevenței” și art. 37 „Concedentul are obligația de a stabili oferta câștigătoare pe baza criteriului/criteriilor de atribuire precizate în documentația de atribuire” există o incompatibilitate, ambele referindu-se la aceeași activitate, dar cu prevederi diferite, fapt ce generează conflicte ale normelor de drept.

Methodology for identifying corruption risks and vulnerabilities

- **Definitions used:**

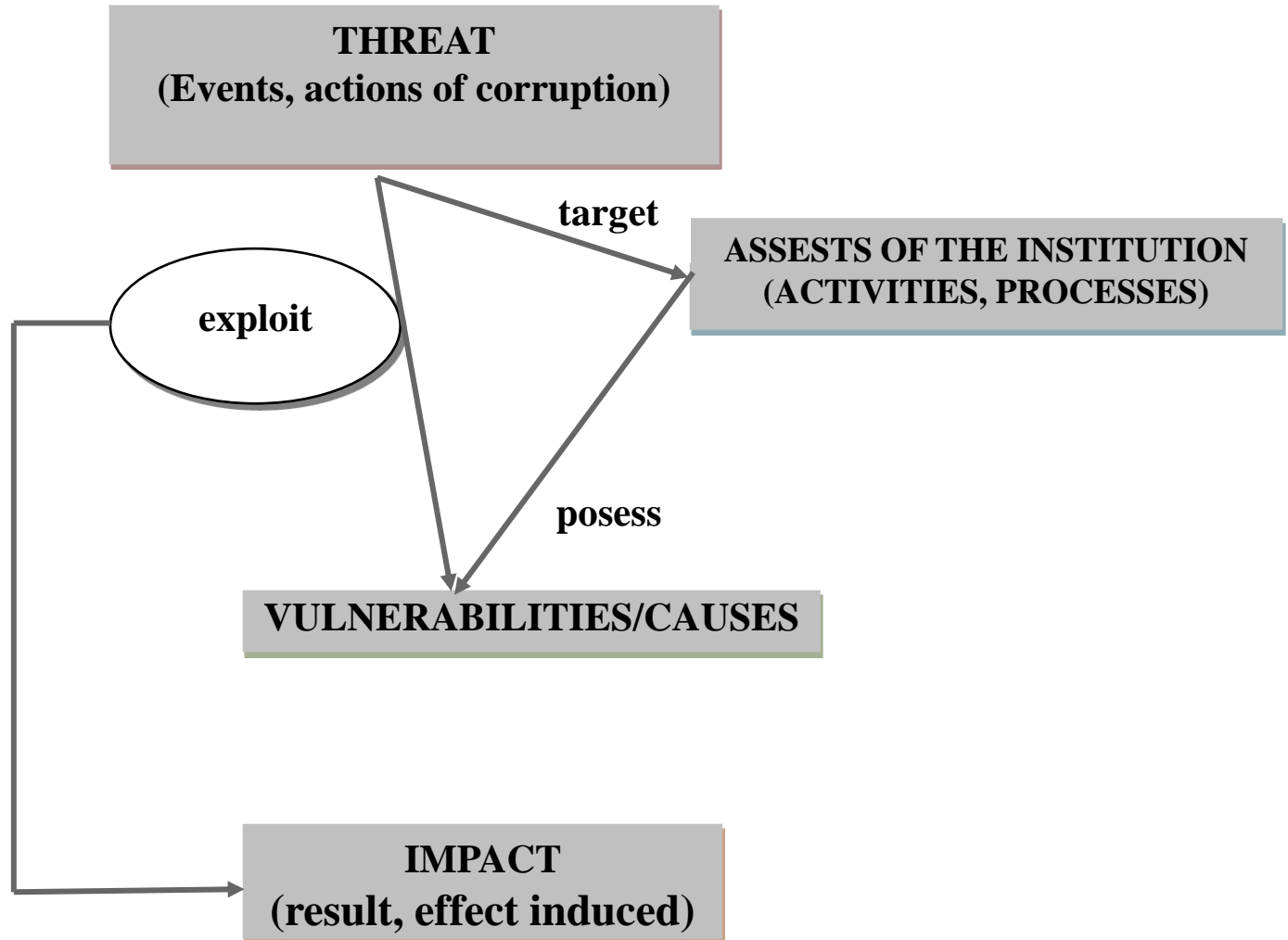
Corruption threat – event of corruption regarding an employee or a professional field.

Vulnerability to corruption – weakness in the regulatory system, the procedures or the control environment of specific activities.

Corruption risk management – identifying the institutional and individual factors that facilitate corruption, and developing recommendations or measures necessary to prevent, mitigate or eliminate the probability of occurrence and the effects / consequences.

Definitions

**R
I
S
K**



Risk vs. Vulnerability

- Risk – The **probability** of a crime being committed and the **harm** it may cause
- Vulnerability – **weakness in the regulatory and control system of specific activities** and the **intention** to commit a corruption crime

INTEGRITY COUNSELOR

Contact person between the management structure, employees and AGD

guidance and communication with the personnel in the field of preventing corruption

support provided to AGD in organizing anti-corruption activities

Secretary of the Prevention of Corruption Working Group and coordinator of risk management activities

Prevention of Corruption Working Group

membership - depending on the size, functions and types of activities

head / commander of the institution

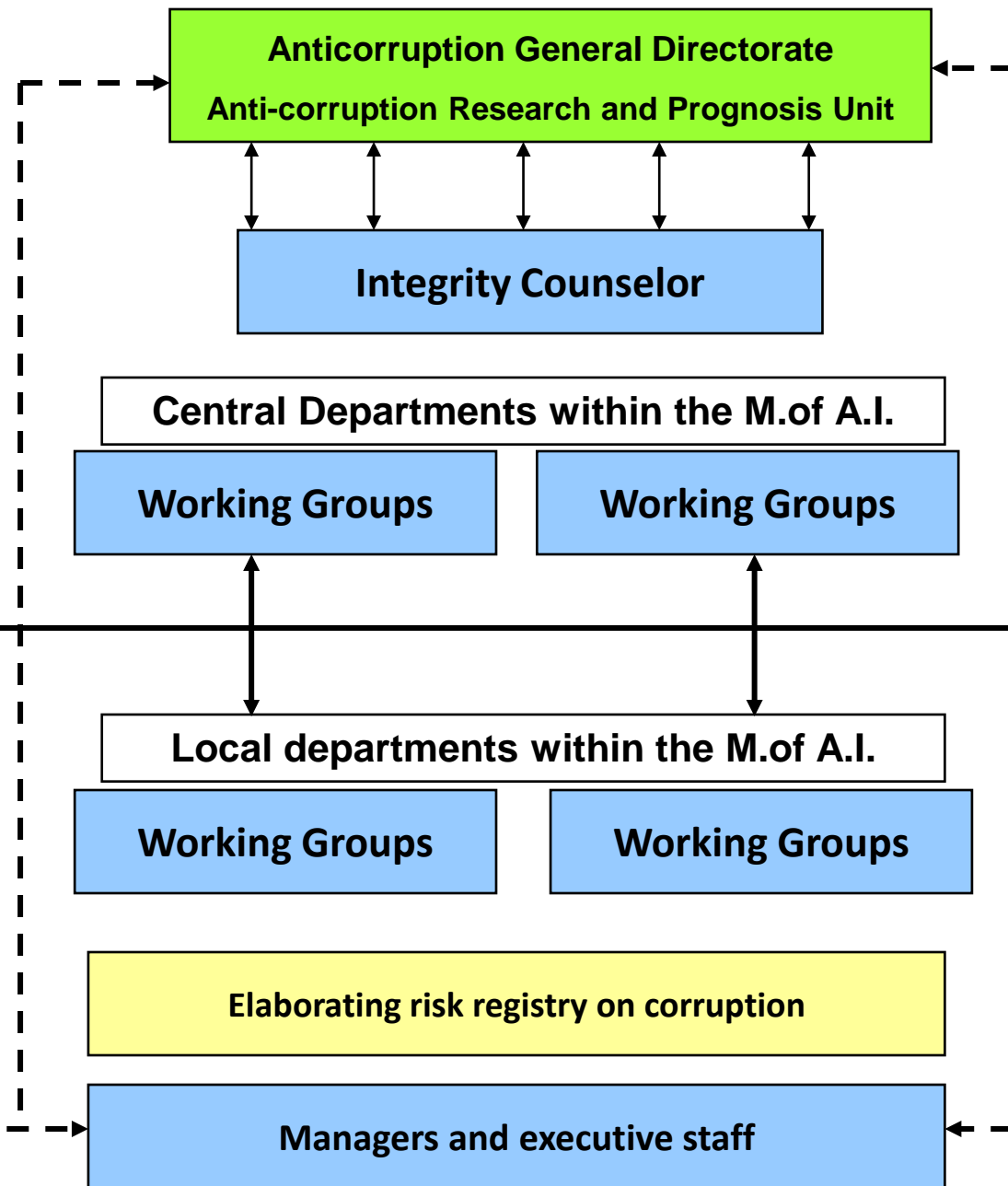
Integrity Advisor, acting as the secretary of the Group

representatives of all departments in the institution (the main decision maker or a deputy)

employees with executive function that can provide significant contributions in terms of professional experience (temporary or permanent members)

representatives of internal partners (other structures of the Ministry) or external institution

representatives of the AGD (central and regional structures corruption)

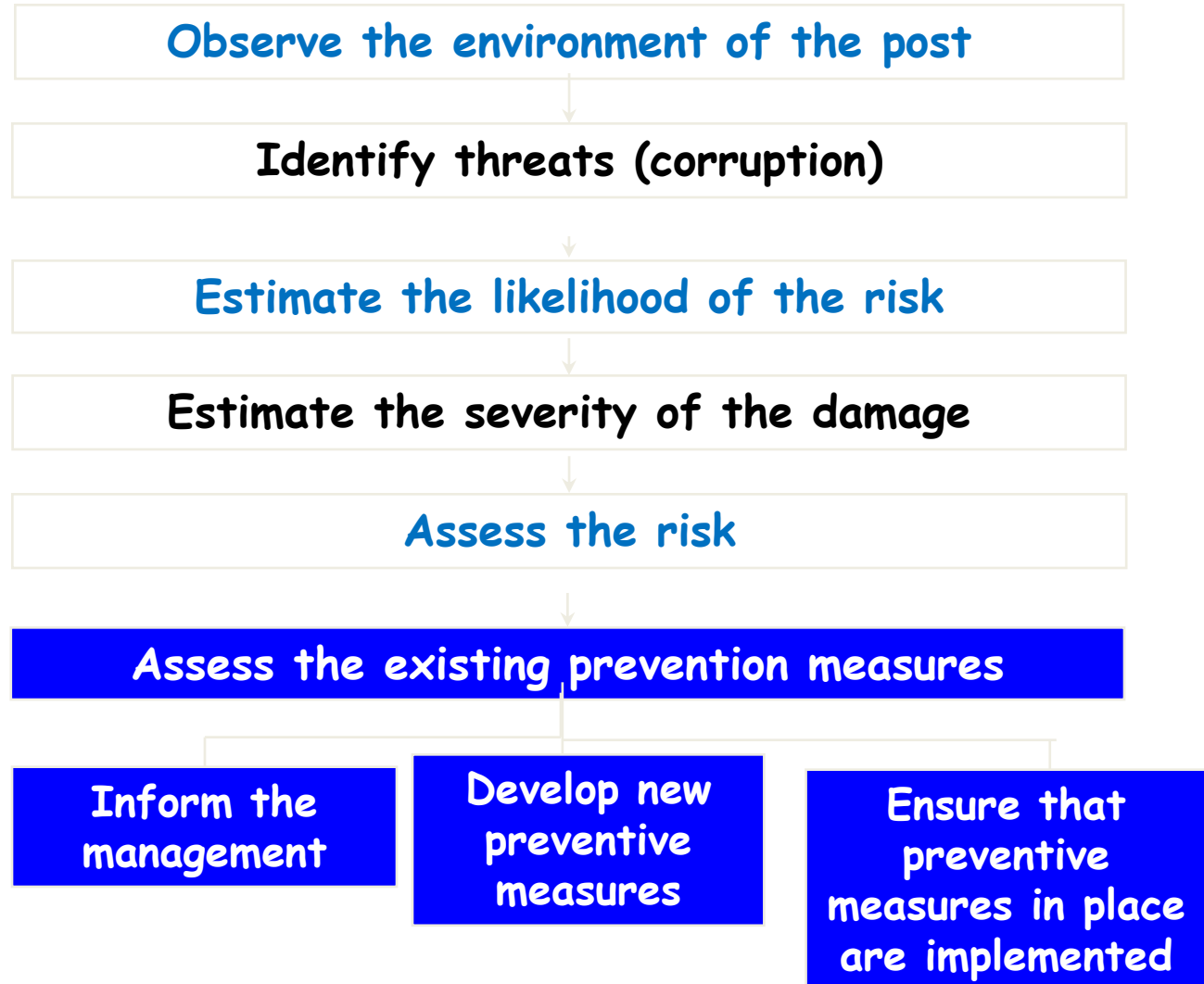


The definition of the general policy of M.of I.A. in the area of corruption risk management

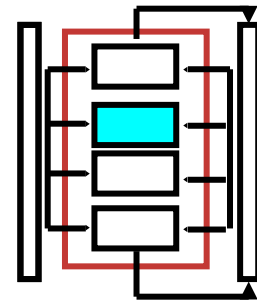
Identification, description, assessment and implementation prevention / control measures

RISK MANAGEMENT from the point of view of the working group

*steps
adopted
for each
activity*



Phase II - Identification and description of risks

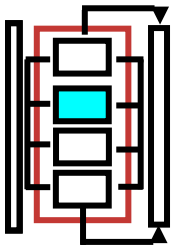


Highlighting potential acts of corruption (threats) present in the current activities and the vulnerabilities associated.

Procedures for identifying threats :

- ✓ evaluation of specific regulatory framework applied in the activity of each department;
- ✓ interviewing management of the institution and its functional or organizational components;
- ✓ discussions / consultations with internal control and audit structures;
- ✓ analysis of corruption cases;
- ✓ evaluation of the specific work situations.

Phase II - Identification and description of risks



Vulnerable fields of activity

One area of activity associated with the following items **must be** considered vulnerable in terms of corruption:

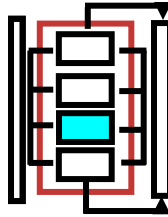
- frequent contact with the outside of the institution, with various categories of beneficiaries of public services
- access to sensitive information (e.g. confidential and potentially valuable information etc.)
- management of resources (e.g. allocation of funds, decisions on procurement etc.)
- granting or restraining of rights(granting of documents, driving licenses, passports, identity cards, permits, certificates, criminal record etc.)
- enforcement of the law (control, surveillance, compliance finding or violation of law, penalties etc.)

Stage III - Risk assessment

APPENDIX no. 3

Questionnaire for the identification of corruption threats/risks

Date:	
Institution:	
Work unit/position:	
What corruption threats/risks do you think you or your coworkers face during your activity?	
What corruption vulnerabilities could be present at the level of the regulation, planning, organization, execution and control of your activity or at the one of your/coworkers' formation or training?	
Which could be, in your opinion, the probability that these vulnerabilities occur if an interest in a corruption act exists? (<i>choose only one answer and argue</i>)	
<input type="checkbox"/> high, because	
<input type="checkbox"/> medium, because	
<input type="checkbox"/> low, because	
How could someone interested in exploiting such vulnerabilities act, what actions should they take or what actual modalities could they use in order to perpetrate a corruption act?	
At what levels could the effects/consequences of the corruption risk occurrence (corruption act) be felt?	
What measures are applied currently or, if not, what solutions do you believe are possible in order to remove or control the corruption risks you mentioned?	



EXAMPLES OF CORRUPTION RISKS

- **Human Resource Management**

- *Drawing criteria and conditions for participation in competitions for job vacancies, so to foster certain candidates.*
- *Disclosure of the evaluation tests, correction scales, interview guide or the content of any other documents / tools used during competitions.*
- *Making appointments for positions, promotions or moves, in violation of applicable laws.*
- *Paperwork and monthly rent allowance without cumulative fulfillment of legal requirements.*
- *Falsifying documents in personnel file of the employees.*

EXAMPLES OF CORRUPTION RISKS

Border police

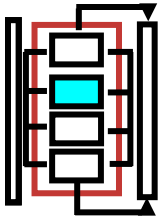
- *disclosure, in exchange for money, of the surveillance system;*
- *enabling the fraudulent entering/exiting of the country of stolen vehicles, in exchange for money;*
- *facilitating Romanian citizens to exit the country, although they do not comply with the legal provisions (travelling documents or IDs which are forged, expired, persons underage or under pursuit);*
- *not implementing into the electronic database certain persons who enter/exit the country, but are known as not compliant with the legal provisions;*
- *receiving money or other goods for entering/taking out of the country of products forbidden by law ;*
- *enabling the fraudulent entering/exiting of the country of foreign citizens, who do not have the necessary documents, or the documents are not valid;*

EXAMPLES OF CORRUPTION RISKS

- **Logistics and Procurement**

- *Receipt of incomplete / deficient payment and acceptance of current repair and modernization (investment) unfinished or poorly realized.*
- *Targeting completion of procedures by a single bidder, by imposing discriminatory conditions in the technical specification.*
- *Direct purchase of goods, services and works (up to 30000 EUR excluding VAT), using nontransparent procedures or avoiding electronic public procurement system (ESPP), in order to encourage certain economic operator.*
- *Increasing the value of an awarded contract, in exchange for personal profit (the regulation allows the increase by 20%).*

Phase II - Identification and description of risks



Data sheet concerning the description and assessment of corruption risks

Name of the structure:		
Title of the working unit/component		
Vulnerable activity under art. 11 within the Methodology:		
Date of issue:	Member of group / work unit coordinator:	Date of revision:

Description of the risk (threat)
Staff at risk:.....
Causes / vulnerabilities that determine the risk: - causes of the regulations - capacity weaknesses in prevention / risk control - Sources of threat - features of organizational culture and human resource characteristics
Effects / probable consequences to the objectives / activities of the structure:.....

Examples of vulnerabilities



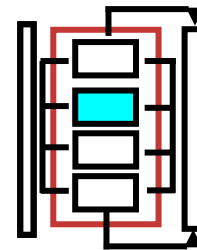
Title and the object of the regulation	Number of the article	Text (extract of the normative act appraised)	Elements / factors that potentially favour corruption	Possible or actual corruption situations	Reccomandations/ proposal to change
Government Ordinance no. 34/2006, regarding public procurement	Art. No 19	The contracting authority may directly purchase goods, services or works (...) if they do not exceed the RON equivalent of 30,000EUR, excluding VAT for every purchase of goods or services, or 100,000EUR excluding VAT per procurement of works. Acquisition is performed based on documentary evidence	High value acquisition: 30,000 euro / purchase of goods or services or 100,000 / each purchase of works.	preferred choice of operators	clear definition of the terms: "Every purchase of goods or services", "every purchase of works" Specification of documents and procedures to follow
Government Ordinance no. 2 of 2001 (* updated *) on the legal regime of contraventions	Art. 7	(1) The warning consists of verbal or written warning to the offender (...) (2) applies if the offense is reduced gravity , (3) can be applied even where the legislative act establishing and sanctioning the contravention provides a sanction	Article allows the police officer to apply the warning totally subjective	Abuse of office , Bribery in order to receive a warning	sanction of a warning should be applied only if expressly provided in the regulation
Ministry of Internal Affairs Order no. 665/2008 regarding human resources activities	Art.26, alin. 3	„The interview is recorded or , if no technical availabilities in this respect, is transcribed by the secretary of the Board”	The procedure for assessing and evaluating the interview allows it to not be recorded audio and video	Secretary of the competition can transcribe the interview, intended in a certain way that may benefit or disadvantage a person	Compulsory technical support to enable the recording of the interview

Examples of vulnerabilities



Title and the object of the regulation	Number of the article	Text (extract of the normative act appraised)	Elements / factors that potentially favour corruption	Possible or actual corruption situations	Reccomandations/ proposal to change
Regulation of the Parliament and of the Council of Europe no. 562 of 15 March 2006	art. 7 pct. 2	If the minimum checks are carried out on persons enjoying the Community right of free movement , border guards may consult, in a non-routine way, with national and European databases ... "	Corruption of border guards (by different stakeholders, as not to perform the verification of databases)	Exit / entry on the Romanian territory of people subject to alerts, European mandates etc.	Replacing the phrase " may consult, in a non-routine way, ..." to "consult ..."

Phase II - Identification and description of risks



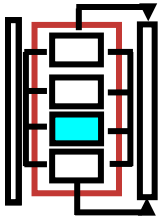
Report on assessing the vulnerability to corruption of internal regulations

Field of activity							
Title and the object of the regulation	issuer (Parliament, govt. etc.)	The category of regulation[1]	Number of article	Text (extract of the normative act appraised)	Elements / factors that potentially may favour corruption	Possible or actual corruption situations [2]	Reccomandations/ proposal to change

[1] laws, orders and decisions of government, in the specific field of activity analyzed; orders of the MAI or other government departments. Rules of organization and operation, methodologies, procedures, arrangements, work instructions and stipulations on the organization of its components, guides, programs and strategies written for a specific field of activity, plans for interinstitutional cooperation etc..

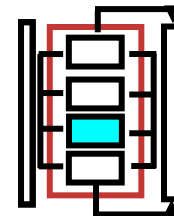
[2] that have been or may be committed in connection with the normative act appraised and if there is no space in this table, we can mention examples in an anti-corruption assessment report.

Stage III - Risk assessment



- 1. estimating the probability of risks materializing**
- 2. assessing the impact**
- 3. evaluating the efficiency of the measures in place for preventing / controlling corruption risks**
- 4. assessment of risk exposure**
- 5. classification and ranking of the risks according to the priority of intervention**

Stage III - Risk assessment

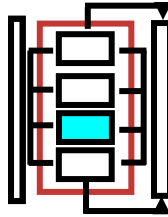


Scale for estimating the probability of the corruption risks

Factor	Score	Description	Indicators	
Almost certain	5	most likely will occur > 80% chances of occurrence	<ul style="list-style-type: none"> • is expected to occur in most professional circumstances; • no doubt it will happen eventually frequently; • imminent. 	risk of corruption is constantly present due to deficiencies of organization, planning, control, supervision or staff training and how the legal framework is designed or implemented
Probable	4	considerable chance of occurrence, it is not uncommon 61% - 80% chances	<ul style="list-style-type: none"> • will probably appear more professional circumstances; • will likely happen, but it will be a persistent problem for the activity; • it has happened in the past. 	
Possible	3	occurrence may be considered 41% - 60% chances of occurrence	<ul style="list-style-type: none"> • in certain circumstances may arise profession; • can happen occasionally; • happened elsewhere in an industry similar. 	risk of corruption can occur sometimes (it is caused by deficiencies in the activity, errors in understanding or application of specific working procedures etc.).
Highly unlikely	2	minimum, but not impossible, it is not known to have occurred 21% - 40% șanse de apariție	<ul style="list-style-type: none"> • can only occur in exceptional professional circumstances; • not expected to happen; • has not been reported in the business. 	risk of corruption is rare, in exceptional circumstances of work;
Improbable	1	Virtually impossible, it never appeared 0% - 20%	<ul style="list-style-type: none"> • is likely to never happen; • unlikely to ever happen. 	

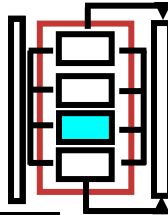
Stage III - Risk assessment

Scale to estimate the overall impact of risk



Factor	Score	Indicators	
major / critical	5	<ul style="list-style-type: none"> impossibility of achieving the objectives set for the activity; Long term damage efficiency, delays in implementation of planned activities (more than 6 months); severe financial losses for replacement or staff training, change of work procedures, technical equipment, etc. unplanned purchases, representing 25% and more of the institution's annual budget; negative publicity internationally, involving policy makers at central or institutional management situation. 	risk of corruption directly contribute to the emergence or proliferation corruption, facilitate or getting staff to commit such acts
high	4	<ul style="list-style-type: none"> impact on field goals affected, impaired effectiveness; medium-term business disruption, delays the normal development of the work (between 3-6 months); Major financial loss to the institution; national negative publicity, loss of trust from the beneficiaries of public services. 	
moderate	3	<ul style="list-style-type: none"> professional goals achieved partly significantly affected its effectiveness; short-term disruption of business; significant financial loss to the institution (at least 10% of the budget); some negative publicity locally. 	risk of corruption can lead to the emergence or proliferation parameters favoring corruption
low	2	<ul style="list-style-type: none"> minor impact on professional objectives; interruption negligible, insignificant conduct of business; moderate financial loss for the institution (5% or more of the budget); Some public baffle isolated but accompanied by a loss of confidence. 	risk of corruption contributes little or at all to the emergence or proliferation of corruption
very low	1	<ul style="list-style-type: none"> minimal or insignificant impact on achieving objectives; any disruption in the timing of the activity; significant financial losses or minimal structure; likely to lead / cause negative publicity. 	

Stage III - Risk assessment



3. Assessment of the level of the control measures for corruption risks

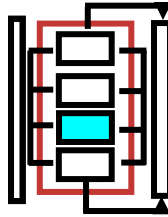
	Question 1	Question 2	Question 3
	Do measures deal effectively with the identified risks?	Are the measures well documented and communicated officially to the those interested or involved?	Are the established measures operational and applied consistently?
no	1	1	1
partially	3	2	2
yes	6	3	3
	Total I₁	Total I₂	Total I₃

Level	Score (I₁+I₂+I₃)	Description
inefficient	3	at best, the measures deal with the risks, but are not sufficiently/well documented or applied; at worst, the measures do not actually deal with the risks concerned, since they are neither documented nor are they applied.
reduced/weak	4	the measures deal with the risks, at least partially, but the documentation and/or the application must be improved and adapted considerably;
good	5-6	the measures deal with the risks, but the documentation and/or application require improvement
very good	7-12	the measures deal with the risk, are well-documented and implemented;

Stage III - Risk assessment

Data sheet concerning the description and assessment of corruption risks

(2)

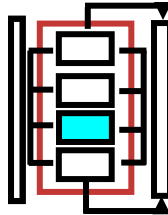


Level of the risk	Probability (P)	Global impact (IG)	Exposure (P x IG)	Priority (1, 2 or 3)
	Impact components / dimensions	Relativity of the components (%)	IMPACT (from 1 to 5)	Relativity of the components x IMPACT
1.				
2.				
n.				
TOTAL	$\Sigma_{[1,n]} 100\%$		$\Sigma_{[1,n]} = \text{Global Impact (IG)}$	

Measures to prevent / control existing currently	Efficiency of the measures
1.	
2.	
3.	

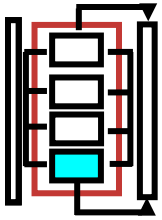
Additional measures to prevent / control the risk	Risk responsible
1.	
2.	
3.	

Stage III - Risk assessment



	RISK CATEGORY	PRIORITATE	ACTION
	High/extreme risks	Priority 1	Needs concentration of attention of leadership for adopting URGENT measures to prevent/control corruption risks
	Moderate risks	Priority 2	Risks may be MONITORED or controlled, either by increasing the efficiency of present measures or by adopting suplimentary controll measures
	Minor risks	Priority 3	Risks may be TOLERATED and will be considered inherent to the activities. Suplimentary measures are not needed, but only aplying existent ones

Phase IV - Planning/implementing risk control measures



Types of control measures :

Organizing activities: correcting anomalies detected in the process development – e.g. separation of functions (provision and control), mutual control, rotation of duties/functions etc.

Training of staff (Developing and promoting an internal culture against corruption)

Internal control: bodies/instruments established to control the risks arising from lack of processes and rules

Skills development for managers to respond to the risks of corruption and notify competent bodies

Corruption risk registry

Part I – Identifying and assessment of the risks

Description of risks		Assessment of the risks					
The corruption threat	causes	Parametrii riscului				Existing measures	Evaluation of the measures
		probability	Global impact	exposure (col. 4 x col.5)	priority		
2	3	4	5	6	7	8	9

Partea a II-a – Planning/implementing risk control measures

The corruption threat	Suplimentary measures	Term	Risk responsible	Monitorring and revision of the risks						
				Assessment of the controll measures		Assessment of revised risks				
				indicators ¹	Corruption cases ²	probability	Global impact	exposure (col. 8 x col.9)	priority	
2	3	4	5	6	7	8	9	10	11	

¹ For each of the measures

² According to the description of the threat



Managementul Asistat al Riscurilor de Corupție

- Acasă
 - Anexa 1
 - Anexa 2**
 - Anexa 3
 - Anexa 4
 - Anexa 10
 - Documente
- Help Incidente de integritate

Export Raspunsuri Chestionar



Organizații (Câmp obligatoriu)

- INSPECTORATUL DE POLITIE AL JUDETULUI IASI**
- ADMINISTRAREA PATRIMONIULUI IMOBILIAR SI INTENDENTA
- ANALIZA SI PREVENIREA CRIMINALITATII
- APELURI DE URGENTA

Exportă

Asociere risc la incident de integritate



Județ

ARGES

Nume structură

Caută

Structură*

INSPECTORATUL DE POLITIE AL JUDETULUI ARGES

Domeniu Activitate*

Structura de retinere si arestare preventiva

Activitate vulnerabilă

efectuarea serviciului de pază și supraveghere a persoanelor private de libertate

Risc

- Acordarea suplimentară de drepturi (de exemplu, la pachet, vizită, telefon, corespondență, cumpărături etc.), peste ceea ce este stabilit prin O.M.J. nr.2714/C/2008 (de exemplu, cu o durată/greutate mai mare, în afara orelor de program și/sau în timpul zilelor nelucrătoare) și întocmirea, în mod nejustificat, a unor rapoarte de recompensare pentru a facilita persoanelor reținute obținerea de drepturi suplimentare, respectiv anularea unor sancțiuni ce limitau accesul la unele drepturi.
- Introducerea sau facilitarea introducerii de bunuri interzise în C.R.A.P.
- Permitea intrării în arest a persoanelor neautorizate și facilitarea întrevederii persoanelor private de libertate cu alte persoane

Ofițeri

Număr acte materiale

Soluție

luni:

Alege

ani:



Agenti

Număr acte materiale

Soluție

luni:

Alege

ani:



Titlu: incident arest 25.07.2014
Tip incident: Rechizitoriu
Data producere incident de integritate: 25/07/2014
Structură: INSPECTORATUL DE POLITIE AL JUDETULUI ARGES -INSPECTORATUL GENERAL AL POLITIEI ROMANE/
Număr dosar penal: 100
Data număr document: 15/Iulie/2014
Conținut

Documente Asociate:

Rapoarte de Evaluare:

Alte Documente:

Domeniu de activitate	Activitate vulnerabilă	Nr. acte materiale și soluții	Risc	Nume Utilizator
Structura de retinere si arestare preventiva	efectuarea serviciului de pază și supraveghere a persoanelor private de libertate	Ofițeri <ul style="list-style-type: none"><i>Nr. acte materiale: 2 Solutie: Condamnare cu suspendare Ani: 2 Luni: 0</i> Agenți <ul style="list-style-type: none"><i>Nr. acte materiale: 6 Solutie: Condamnare cu suspendare Ani: 3 Luni: 0</i>	Introducerea sau facilitarea introducerii de bunuri interzise în C.R.A.P.	Mihai Barlici



Descrierea amenințării de corupție	Măsuri suplimentare	Termene	Responsabil(i) de risc	Monitorizare și revizuire						
				Evaluarea măsurilor de control		Parametrii riscului revizuit				
				Indicatori de evaluare	Evaluare măsură	Riscuri de corupție materializate	Probabilitate	Impact global	Expunere	Prioritate

Structura de retinere si arestare preventiva

Introducerea sau facilitarea introducerii de bunuri interzise în C.R.A.P.	dotarea lucrătorilor care asigură drepturile arestaților la pachete și vizită, cu dispozitive de detectare a obiectelor interzise ce pot fi introduse în arest cu ocazia desfășurării acestor activități (arme, cutite sau alte obiecte întepătoare tăietoare, componente electronice pt.telefoane mobile etc)	25/07/2014	Șeful CRAP, Șeful Serviciului Logistic	achiziția de dispozitive și asigurarea instruirii		1				
	amenajarea intrărilor în camerele de arest cu dispozitive de detectare a obiectelor interzise prevăzute cu înregistrarea fluxului		Șeful CRAP, Șeful Serviciului Logistic	puncte de acces amenajate						
	monitorizarea continuă a documentelor din dosarele de penitenciar și executarea controlului privind respectarea programului zilnic		Ipj Iasi Consilier	Număr controale						

◀ iulie 2014 ▶

Su	Mo	Tu	We	Th	Fr	Sa
29	30	1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31	1	2
3	4	5	6	7	8	9