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**THE MINISTRY OF INTERIOR AND ADMINISTRATIVE  
REFORM**



**GENERAL ANTI-CORRUPTION DIRECTORATE  
PUBLIC RELATIONS, ACCESS PREVENTION AND  
CONTROL UNIT**

**Preventing corruption in the Ministry of Interior  
and Administrative Reform (M.I.R.A)  
and the relation with the civil society**

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## I. Institutional framework

The General Anti-corruption Directorate has within its organizational structure a unit in charge of Public Relations, Access Prevention and Control that has a team specialized in preventing corruption within the personnel of the Ministry of Interior and Administrative Reform. Likewise, at the level of each county anti-corruption office there is one public relations and prevention officer responsible for preventive activities in the territorial units of the ministry.

The Prevention Department within the central structure of the directorate coordinates the entire preventive activity carried-out by the institution. To this end, the ministry adopted a preventive work methodology, set objectives whose assessment is done using a set of business indicators.

## II. Key objectives of the preventive activity

The preventive activity carried-out at the level of the General Anti-corruption Directorate is based on the Unique Plan of Activity of the institution, as well as on the Preventive Quarterly Action Plans. They outline both the objectives and the specific actions to be taken to achieve them.

The main objectives pursued in the prevention activity are to:

- *identify and analyze risk factors and threats;*
- *inform, promote and convey anti-corruption messages;*
- *develop and maintain good cooperation with the other units of the ministry;*
- *cooperate with the civil society.*

Such objectives are achieved by organizing and carrying-out various categories of activities.

### *Identify and analyze risk factors and threats*

Any analysis of the cause of a corruption deed shall highlight a series of risk factors that triggers the occurrence of such deeds.

**Vulnerability** is considered any actual situation or deed that allows a public servant holding a public office or carrying-out an activity to drive undue benefits by dint of his position. The most frequent example is provided by the direct contact with the citizens outside the institution. Such a circumstance leads to increased vulnerability with regard to public servant's corruptibility since it is difficult to verify whether there was a contact between the servant and a citizen, how many such contacts did take place, and, most important, which was the situation found (work reports may confirm the existence of such a contact, however they would fail to reveal its content). Vulnerability is created by the impossibility to verify the situation retroactively. If we are also to add the lack of ad-hoc controls, then the public servant, aware of the low chances of discovering and probing the deed committed, shall be much more determined to accept undue benefits in exchange of law violations.

Considering the afore, the most widely spread threats and risk factors identified within the preventive activity carried-out by the staff of General Anti-corruption Directorate are:

- **direct contact with the citizen outside the institution** (contact between the public servant and the citizen, in most of the cases, cannot be directly monitored or retroactively checked);

- **the quality of agent finding violations and offences** (the public servant has the legally-provided possibility to find and establish, however not to apply sanctions on-site);
- **the legal and institutional framework applicable to control and verification of activity** (lack of controls, their programmatic nature and shallowness – restricted to compliance, missing the substance matter);
- **high demand of the citizens regarding a certain public service rendered by the institution** (most of the citizens are willing to offer gifts or any other benefits in exchange for spending less or no time in queues or for shorter periods for reduced certain applications);
- **staff promotion based on subjective criteria** (formal organization of the job contests);
- **relational framework of the public servant** (friendships or family relations between public servants and citizens);
- **organizational culture** (the way the social and work relations are carried-out influences the way the professional ethics and laws are observed) ;

All these vulnerabilities and threats presented above have rather general. In each individual situation one can identify various factors that could impact on outlining the relevant situation.

## **Most exposed units of the Ministry of Interior and Administrative Reform**

Any unit or department of the Ministry of Interior and Administrative Reform has a high degree of vulnerability. It is very important to know that, although the overall exposure of an unit could be very high, not all public servants are faced with the same risk level. In any unit there are public servants that find it impossible to drive undue benefits on account of his office.

Vulnerability needs to be related to several factors:

- field of activity;
- business line;
- the office or position actually held;
- current issues in the area of responsibility;
- actual situation in which the employee or subunits carries-out activities;
- organizational culture;
- public servant's profile.

### **Field of activity**

Some of the most exposed structures are those working directly “in the street” to find and establish whether any violations were committed and to apply the corresponding sanctions whenever offences are discovered. In this category we can include public order units, traffic police, the public order units of the gendarmerie, border police units in border-crossings.

Another high vulnerability category includes visas, authorizations, approvals and documents issuing entities. These are: firemen divisions issuing construction endorsements, public order police units – security departments, community public services, cadastre and land registration office.

Another high risk field of activity relates to logistics, building management and car fleets. They procure and manage large quantities of assets belonging to the institution.

Human resources is among the highest vulnerability and risk units with respect to staff's recruitment, as well as its transfer and promotion. In this field we also find the educational units of the ministry.

## **Business line**

Even if we are to assess the vulnerability of a high corruption risk domain, not all the public servants working in that domain incur the same degree of vulnerability, but only those involved in certain business lines or performing certain tasks.

## **The office or position actually held**

The office and position held by a public servant influence the most the vulnerability to corruption. Holding an office or position and undertaking certain activities stand for factors able to favor the public servant in driving certain benefits.

The actual job responsibilities assigned to the public servant are the best indicators of his contact with the citizen or with other public servants, as well as his of his authority to take certain actions or to apply sanctions and to draft work reports.

## **Current issues in the area of responsibility**

Citizens' tendency to influence the honesty of a public servant depends to a large extent on the issues faced by the citizen in his community. Subsequently, similar units of the ministry located in various parts of the country can be faced with different workloads, as well as with a wide range of different matters. The workload can lead to citizen's tendency to offer something in exchange for wasting time. Another example could be the business opportunities available to the citizens in certain areas and, from this, the increase interest for certain services rendered by the units of the ministry. This is another factor leading to a high degree of vulnerability.

## **The actual situation in which the employee or subunits carries-out activities**

There are situations in which location of more than one unit or department in the same premises can increase the degree of vulnerability. The best example is represented by population's records and passports units, as well as by the car registration and driving license functions that coexist in the same building with traffic police as a result of the former organization of the ministry and of the lack of space. This fueled trade of influence in the relevant units.

Likewise, failing to observe the norms regarding access to the ministry's premises, as well as the professional secret principles can result into similar risks.

## **Organizational culture**

Regulated relations timely set within each team are to be assumed by every new-comer and have a particular impact on the corruption risk. Group's cohesion may mislead an individual into thinking that should any problems occur, he would benefit from colleagues' support.

Nevertheless, this factor is very difficult to assess and needs to be considered especially when there is a visible trend to benchmark two or more units.

## **Public servant's profile**

Public servant's profile is itself a factor that evolves in time according to the other factors listed above. Training, education, professional development, as well as the work environment do contribute to picturing an overall image on a public servant's integrity.

## **Inform, promote and convey anti-corruption messages**

Strong knowledge of law, sanctions and risks faced by a person when committing a certain deed can have a discouraging effect over the future potential wrong-doers.

Timely information on the results of finding and sanctioning certain deeds can be equally discouraging for potential offenders. Public disclosure of the cases solved can enhance the risk of being caught in the mind of the potential offender.

In this respect, in 2006 the prevention officers within the General Anti-corruption Directorate organized 2,876 meetings attended by 96,059 public servants working for the ministry (86.14% of the entire staff).

Topics of the meetings :

- the General Anti-corruption Directorate, its authority and structure;
- anti-corruption legislation;
- provisions of the codes of ethics;
- procedural aspects regarding reporting corruption situations, with focus on public servant's obligation to report such cases;
- promote the free line 0800.806.806 established by the directorate as a special vehicle to report corruption deeds;
- promote the legal provisions regarding protection of the whistleblower;
- means of undertaking the integrity test, as well as distinguishing between this test and the loyalty test performed by other units of the ministry;
- presentation of actual situations instrumented by the General Anti-corruption Directorate (in several cases it included images taken during flagrant disclosure of the offences);
- supply of contact data regarding the directorate and its territorial units;
- all the meetings included an opened discussion interactive session involving both the participants and the representatives of the General Anti-corruption Directorate.

In another train of thoughts, such briefing sessions should be also aimed at potential victims or at those in any way affected by the consequences of certain offences on purpose of informing them of the reporting possibilities, as well as of the protections provided to them when signaling a unlawful act.

Therefore, the General Anti-corruption Directorate carries-out information campaigns aimed at the civil society, either independently or in partnership with other institutions or non-governmental organizations.

Simply rendering a certain service to the citizens and providing them related information may not be sufficient to convince the citizen to use such service or to support an institution. Therefore, in order to trigger a change in citizen's attitude and convince them to get involved, there are mandatory activities to be undertaken whereby to convey various messages, highlight key points and attract attention of the target groups.

Similarly, seminars, meetings, publication of certain materials in the newspapers, display of information materials in high traffic areas can be useful tools to send messages, independent to an information campaign. Therefore, the results obtained by the institution were delivered to the mass-media, certain materials were displayed in the premises of ministry's units, as well as in large shopping centers.

## **Development and maintenance of good cooperation with ministry's structures and units**

The purpose of the preventive activity carried-out by the DGA is to determine an integer behavior among ministry's public servants. To this end we want to be aware of all the problems faced by various units or categories of public servants. This can be accomplished only by maintaining close and active relations with ministry's public servants.

On the other hand, even if we did identify a series of problems, it seems advisable to try to solve them together with whoever is involved directly, providing them also the support need to identify and promote certain measures. Purely theoretical approached are very likely to never find their way into becoming practices.

## **Cooperation with civil society**

The civil society is a balance factor in democratic operation of an institutions providing an objective image of the activity, as well as solutions to various problems.

Cooperation with the civil society is itself a mean of opening towards the citizen, of ensuring transparency and active and efficient communication with the beneficiaries of the services rendered by MAI units.

At the level of the Ministry of Interior and Administrative Reform there is a Strategic Committee that analyzes and assesses the activities of the General Anti-corruption Directorate. It consists of the heads of the central structures of the ministry, as well as of the representatives of three non-governmental organizations concerned with corruption prevention. The committee meets on regular basis and analysis certain aspects of the activity carried-out by the Directorate and proposes means of improving corruption prevention and combating.

### **Causes of the corruption**

#### **1. Causes related to staff recruitment, training and promotion:**

- (sometimes) Deficient training on knowing and applying the legal provisions regarding deeds incriminated as corruption, assimilated or related thereto;
- The low level of professional and civic training of employees, corroborated with failing to learn the ethical and professional obligations;
- Lack /law resistance to the temptations offered in exchange for improper or no performance of job responsibilities (amounts of money, goods, services, benefits, etc.);
- Flaws or shortcomings in the human resources recruitment, selection, employment and promotion system that can favor potential acts of corruption (for example direct employment, job promotion, etc.);
- Insufficient attention paid to the quality factor and to knowing the applicants in both direct employment and especially in selecting candidates for MIRA specific academies, provided that certain persons are interested in these institutions simply because certain units “promise” to allow them gain extra money;
- Frustration and a feeling of helplessness experienced by certain public servants working with MIRA, due to educational deficiencies, that are faced with obvious corruption cases that remain unpunished.
- Lack of appropriate turnover of the staff working in high corruption risk areas;

#### **2. Causes related to the resources allocated to MIRA’s units and employees:**

- The unattractive public sector wage and promotion system applicable to MIRA’s public servants incompliant with their social statute, job-related risks, social and cultural needs and demands, compared to other professional categories or categories of citizens they have contact with;
- System’s incapacity to support the housing problems experienced by MIRA’s employees;
- Lack of operational and technical endowment (IT system, communication network) of certain MIRA units,
- Lack of endowment at MIRA’s units level leading to the necessity to obtain sponsorships or to “solve” certain business issues.

#### **3. Causes related to making MIRA’s staff responsible and to organizing certain activities**

- the current system cannot provide on-line services to the citizens presenting to the counter, this leading to long waiting periods until the documents are received compared to the service promptness of similar institutions in other countries;
- the institutional system is unable to reduce bureaucracy, as well as acting in a rush in certain situations to *prove* to foreign audit experts the reform of the public administration;
- difficulties in applying the provisions of certain items of legislation whenever their number is very high, as well as plenty of ambiguities, shortcoming and contradictions;

- the shallowness of certain items of legislation that allow public servants subjective interpretations or judgments;
- inefficiency of the internal procedures and process, unclearly defined responsibilities at institution level, etc.;
- the activity assessment procedures are insufficiently developed or incompatible with the activity actually carried-out;
- lack of management involvement in exercising command and especially in learning about the personal problems or the behavior of their own employees that are related or could result into low performance;
- failure to take timely actions against any person whose lifestyle and wealth are incompatible with his earning capacities;
- too formal ad-hoc controls and failure to take timely actions against any employee that violated legal provisions;
- lack or insufficient control exercised by responsible persons, direct managers, over the activities carried-out by MIRA's public servants;
- a certain trend noticed at management and control function level to condone or cover for certain digressions – out of fear of being subject to actions taken by their superior managers, of making the case public in the media, losing their position, etc.;
- failure to control all the operations required by law to go through all the procurement stages and procedures
- failure to draft clear procedures at MIRA's level for enforcement of Law no. 571 /2004, regarding protection of the public servants working in public institutions reporting violations of law (integrity warning).

#### **4. Causes related to the organizational culture within MIRA and to current habits of the citizens:**

- certain habits preserved among employees to ask for benefits in exchange for services;
- the new employees have the tendency to opt for certain units or services that are “famous” for allowing them to “round-up” their income;
- certain habits preserved whereby so-called colleagues from various other units within MIRA make intercessions for solving the applications of their *acquaintances*, sometimes even up to the limit of the law;
- management's habits to ask their subordinates and the high officials of the ministry to solve questionable-legality matters using their subordinated structures;
- lack of training among MIRA staff to turn-down illegal orders or to report to qualified persons any illegal activity undertaken within their units;
- preservation of a trend within MIRA's employees to cover-up for their colleagues, including when committing illegal deeds. Such a culture of complicity grounds on the “bond” developed in time between employees by taking part in difficult missions, joint performance of certain tasks, etc., as well on the “opposition-towards-control” state of mind (internal control, anti-corruption, protection);
- citizens' unaltered perception that public servants need to be rewarded for the services provided, that they are actually favored, etc.;
- the trend of certain interest groups to corrupt MIRA's public servants on purpose of benefiting from privileged treatments, of the latter failing take the required actions, undertaking criminal activities, facilitating access to certain procedures, etc.

## APPENDIX 2

### **VULNERABILITIES** **experienced by the main units within MIRA**

#### ***POLICE:***

##### ➤ ***PUBLIC ORDER :***

- Failure to carry-out the assignments and to take persons into custody whenever there are supporting evidences available (potential agreements between the officers or agents assign to carry-out such missions and their targets, namely the latter can be allowed a certain period of time to leave the country in exchange for some material benefits);
- Abusive grant of authority to guards, security agent, etc. (by granting such powers to persons that do not meet the legal conditions – have criminal record for example – or by failing to observe the legal terms in exchange for obtaining benefits);
- Approval of the security plans developed by security companies, although there weren't enough security posts provided for the premises in question (eg. an objective stretching over 5 hectares has only 3 security posts assigned); in fact, many of the security agents are employed under the counter;
- Failure to observe the instructions of the general inspector regarding police staff turnover once in five years (keeping the heads of the police station in the same position for too long may lead to them having too close relations with the citizens in their area of competence).

##### ➤ ***TRAFFIC POLICE:***

- Failure to communicate the purpose of the traffic control, taking advantage of the driver's ignorance, control of a large number of aspects, presenting the potential sanctions in very sever light, with the police officer willing to show "kindness" and enforce only few of the sanctions. That is why the citizen seems very tempted to offer something when he finds himself alone with the police unit in the street. The possibility to check such situations retroactively is almost null, while the lack of any ad-hoc professional sanctions-followed control encourages the policeman to accept various gifts;
- Abusive approval of reduced suspension time of the driving license or restitution of the driving license and unjustified extension of the driving license replacement certificate (although not all legal conditions are met and the enforcing officer claims or receives certain benefits);
- Forgeries in case of passing the driving license exam (subsequent replacement of the multiple choices test for a certain applicant in exchange for certain benefits);
- Failure to enforce the legal provisions when collecting the biological samples, retaining the driving license or applying the fine (by using expired alcohol-level measuring devices, by measuring the blood alcohol level too late from the date of the event, by recording the blood alcohol level of another person in the blood alcohol findings documents pertaining to the person involved in the traffic incident);
- Failure to apply or reduce the value of the sanctions and fines applied to the participants to the road traffic for infringements of the traffic regulations on public roads (for example, in case of speed limits violations);
- Delayed delivery (sometimes for very long periods of time) to S.P.R.P.I.V of the notices regarding suspension of the driving licenses so that the persons in questions are allowed to drive their cars;

- The new amendments of the Traffic Code include more severe sanctions that make the offenders of the road traffic regulations more tempted to offer the officers various benefits to prevent application;
- *CRIMINAL INVESTIGATIONS:*
  - Use of experts (the parties involved usually ask for policeman's opinion on an expert; nevertheless such an opinion may be subjective) that are instructed on how to formulate their findings;
  - Facilitate offender's meeting with his/ her family on the occasion or on a plea of taking the person out from custody for further investigations; any taken-out of custody is recorded, however it cannot be checked whether such an action was mandatory and what really happened on that occasion. In the same period of time, family members can also be invited on the plea of conducting investigations. The failure to prove this encourages the policeman to facilitate such contacts;
  - Facilitate packages delivery to detainees, visits, as well as receipt of other goods not allowed by the law. The detention premises have registers recording any leave of the premises by the detainee, as well as any package they receive. Should such records lack, the possibility of checking is almost null which encourages the police investigators to facilitate packages receipt (in exchange for gifts or provision of information useful to the cases pending investigation);
- *FRAUD INVESTIGATION::*
  - Collection of protection fees from companies or favoring them in their business relations (by failing to undertake financial controls or by undertaking dummy controls only on paper or by giving prior informal notices regarding the controls to be undertaken);
  - Seizure of smaller quantities of goods and valuable objects than those found during investigations; this risk occurs when the control is undertaken by a small team whose members work in the same unit and are well acquainted;
  - Provision of material incentives to police officer on purpose of delaying the enforcement of recovery actions related to the damage caused by committing criminal deeds (potential understandings between police officers and their targets for the latter to be able to hide the relevant goods or empty their bank accounts, etc.);
  - Collection of competition-related data and information from companies. Most of the times they come to offer such information to cause damages to their competitors. Such operational information are used by the police officer (whose purpose is also to have an impressive activity and casuistry). This activity can be beneficial to whomever supplied the information that can also be tempted to offer an extra- benefit to the police officer. The chances to check how such information was actually collected and whether undue benefits were obtained (for a company they can consist in services, favors for itself or third parties), as well the possibility to prove the situations are very low.
  - Supply of operational data regarding organization and performance of Police operations aimed at finding and annihilating criminal groups (potential connections between the police officers and their targets. In exchange for material incentives, police officers may supply data regarding the missions to be undertaken, this leading to a such mission's failure);
- *CRIMINAL, ORGANIZED CRIME AND ANTI-DRUGS INVESTIGATIONS:*
  - Disclosure of information to offenders (pimps, prostitutes, collection men, crooks, illegal money exchangers, etc.) by advising them on the files in which they are investigated and providing data that could favor them during investigations;
  - Helping persons under prosecution or subject to a conviction warrant (potential understandings between the officers or agents assigned with enforcing such actions and their

targets on purpose of allowing the latter additional time to leave the country in exchange for material undue benefits).

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- **CRIMINAL RECORDS:**
- Once the criminal record certificate is issued the institution is left with no evidence of the content of such certificate; this renders impossible subsequent verification of an incomplete certificate issued by a police officer to a certain person;
  - Failure to record in the criminal records the communications filed by the courts of law; when undertaking a control it is very difficult or even impossible to review all the file drawers or individual criminal records that makes identification of potential recording failures very law moreover since they appear registered and completed in the correspondence register, meaning the recordings have been made;

## **BORDER POLICE**

- Shallowness in undertaking documents review in the border-crossing due to congestions experienced in certain areas or during certain periods of time, fact which can favor corruption;
- Invoking “harbor common law” in the professional relations with ship commanders, agents, ship owners (by claiming material benefits in return for preferential documents clearance);
- Failure to check the offending drivers in the database of driving license-holders and failure to record them in the IT system in exchange for material benefits;
- Drafting action plans so that in certain areas or during certain periods of time there is no border police on purpose of favoring smuggling activities. The chief of shift can set-out very precisely where the effective forces are to be located so that smugglers crossing through one particular point in a particular moment cannot be traced;
- In certain border-crossings the joint control team is located on the territory of the neighborhood country this leading to a gap of territorial authority for the criminal investigation bodies (leading to failure to detect flagrant deeds);

## ***GENDARMERIE***

- Abusive grant of authority to security agents (by granting such powers to individuals that do not match the legal conditions – for example they have a criminal record – or by failing to observe the legally-provided terms) in return for obtaining material benefits provided that certain institutions have own security staff and security services provided by the gendarmerie forces at the same time;
- Failure or improper drafting of the findings documents related to flagrant crimes or offences by inaccurate description of the actual situation that can lead to a different juridical classification of the deed (theft of oil products, wood material, poaching, etc.);
- Failure to observe the norms regarding access to public institutions or to protected objectives (eg. Embassies or consulates) by allowing access of certain individuals in the buildings outside the business hours in exchange for small gifts.
- Provisions of services and of various solutions to citizens' problems by exercising job-related influence.

## ***EMERGENCY SITUATIONS***

- Almost permanent job-related contact of the emergency personnel with the superior personnel of companies, institutions and municipalities and with the general public (especially with regard to the preventive control units). Such a framework can nourish occurrence of law violations or attempts to solve personal interests by avoiding the law which can subsequently turn into corruption;
- Mass external employment in 2006 and flaws in the recruitment, selection and employment process of professional emergency staff.

## ***DRIVING LICENSES AND CAR REGISTRATION:***

- Access of IT applications containing drivers and registered car owners personal data to be used in illegal purposes. This activity can be deemed vulnerability to corruption; nevertheless whoever attempts to or do disclose any unauthorized information from the databases managed by the directorate can be technically identified and called to account;
- A very sensitive area to corruption is the actual examination of the driving license applicants, starting with the theoretical test, continuing with the driving skills test and concluding with the issuance of the documents giving a person the right to drive. Illegal activities can be the following: *disclosing the correct answers* to the questions in the multiple choices test, *helping applicants during examination by pointing them the correct answers*, *adjusting the score for those who didn't meet the number of correct answers*, *shallowness during skills testing by choosing an easy traffic route*, *failure to ask the applicant to prove his /her driving skills or, even worth, declaring the applicant ADMITTED without having to actually go through the practical examination*;
- The driving license examination methodology allows the examiner to select the applicants to test which creates the possibility of potential prior understandings between the parties in questions;

## ***PASSPORTS ISSUANCE AND RECORDS:***

- Access of IT applications containing passport holders' personal data to be used in illegal purposes. However such vulnerability is mitigated since whoever attempts to or do disclose any unauthorized information from the databases managed by the General Passports Directorate can be technically identified and called to account;
- The activities carried-out on a daily basis in the public counters to take-over the documents from passport applicants who needs fast processing of their applications, hearing and solving any legitimate request coming from persons that use the services provided by these units operating within the Prefect's Office in each county *are all activities vulnerable to corruption* involving the community services officers with responsibilities in this respect;
- In passport units corruption starts-off with trading influence, interventions for solving applications outside the regulated framework, "small gifts" namely accepting "something" in return for certain services, until activities that can be associated with organized crime namely issuance of fake identity documents, human beings trafficking, etc.
- In many situations, the potential offenders had been long studying the relevant officers to learn their weaknesses (groundless money-making desire, lecherous persons, alcoholics, etc.) and subsequently involve them in committing offences.

## **CADASTRE AND LAND REGISTRATION**

- Receipt of money and undue benefits by the inspectors in charge of checking the cadastral documentations and by the registration officers to favor approval and fast processing of documentations submitted with higher registrations numbers;
- Receipt of undue benefits from natural and authorized legal personal, real estate agents, notary and other institutions representatives by the cadastral inspectors and registration officers in order to neglect certain errors or lacks of compliance and to approve the technical documentation even if they are aware they violate the regulations and methodological norms and of the legal effects and consequences of such violations that can even lead to court disputes;
- Certain employees use and turn to account in personal interest unlicensed software applications stolen from data bases, as well as the equipments and technology of the subordinated units for private activities;
- Destroying archived documents so that when a citizen files an application regarding a real estate property in dispute, such person cannot obtain information of the real legal situation of the real estate property;
- Very high fees charged to obtaining a Land Register Excerpt and lack of standardized form allow the MAI public servant to issue such excerpts without charging such fee or issuing an invoice;

## **POPULATION RECORDS:**

- Employment at territorial level is organized by the Municipality with INEP providing just an endorsement regarding employment of a certain individual. This allows the Mayor to facilitate employment of specific persons in these units;
- Supply of personal data to organizations or persons targeted by the police by unauthorized access of the data in the electronic “*special records*”;
- Trading of influence exercised by other MAI public servants over the employees of this institution on purpose of solving with priority certain applications in the detriment of others.

## **HUMAN RESOURCES UNITS**

- In case of external employments, job announcements are published on very short notice (even only one day, one single display of the announcement) and in as few newspapers as possible since instructions and human resources OMIRA fail to provide a minimum requirements in this respect;
- In case of the information regarding organization of such job contests (unfreezing the jobs, examination subjects, bibliography), the human resources staff has the possibility to inform certain persons – that would have additional time to prepare for the exam compared to the other potential candidates that would learn such information only upon (legal) publishing of the job announcement; and
- Human resources staff has unlimited access to the subjects of the previous exams, as well as to the bibliography being thus able to supply to potential candidates examples of exam topics, as well as guidelines on the subjects (the bibliography may be amended to include courses or manuals that are difficult to obtain, are MIRA internal documents, etc. and unavailable to the ordinary citizens);
- MIRA Order no. 300/2004 regarding human resources activity outlines that the interview and the eliminatory examination cannot be challenged which gives the examination commission the possibility to unfavorable grades to certain candidates in the favor of another one.

## **EDUCATION UNITS**

- Facilitate passing certain professional training courses without actually attending them. Certain public servants need various courses (such as “Management Training” for management staff); since most of the times such courses are organized in another city for a compact period of time it is very likely for those interested to use various material means to obtain the relevant certification without actually attending the course.