Corruption risk analysis within Romanian Ministry of Internal Affairs
Anticorruption General Directorate

Prevent

Combat

corruption acts committed by the Ministry of Internal Affairs personnel
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”
The report “Risks and vulnerabilities to corruption”
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

THREAT
(Events, actions of corruption)

ASSESTS OF THE INSTITUTION
(ACTIVITIES, PROCESSES)

VULNERABILITIES/CAUSES

IMPACT
(result, effect induced)

RISK

exploit

target

possess
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.

Anticorruption General Directorate
Anti-corruption Research and Prognosis Unit

Integrity Counselor

Central Departments within the M.of A.I.

Working Groups

Local departments within the M.of A.I.

Working Groups

Working Groups

Elaborating risk registry on corruption

Managers and executive staff
RISK MANAGEMENT from the point of view of the working group

Observe the environment of the post

Identify threats (corruption)

Estimate the likelihood of the risk

Estimate the severity of the damage

Assess the risk

Assess the existing prevention measures

Inform the management

Develop new preventive measures

Ensure that preventive measures in place are implemented

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.
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**

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<tr>
<td>Institution:</td>
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<td>Work unit/position:</td>
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</table>

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/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? *(choose only one answer and argue)*

- [ ] high, because
- [ ] medium, because
- [ ] 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

<table>
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<tr>
<th>Name of the structure:</th>
<th>Title of the working unit/component</th>
<th>Vulnerable activity under art. 11 within the Methodology:</th>
<th>Date of issue:</th>
<th>Member of group / work unit coordinator:</th>
<th>Date of revision:</th>
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### Description of the risk (threat)

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## Examples of vulnerabilities

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

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<th>Text (extract of the normative act appraised)</th>
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<th>Reccomendations/ proposal to change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulation of the Parliament and of the Council of Europe no. 562 of 15 March 2006</td>
<td>art. 7 pct. 2</td>
<td>If the minimum checks are carried out on persons enjoying the Community right of free movement, <strong>border guards may consult, in a non-routine way, with national and European databases ...</strong></td>
<td>Corruption of border guards (by different stakeholders, as not to perform the verification of databases)</td>
<td>Exit / entry on the Romanian territory of people subject to alerts, European mandates etc.</td>
<td>Replacing the phrase “may consult, in a non-routine way, ...” to &quot;consult ...&quot;</td>
</tr>
</tbody>
</table>
# Phase II - Identification and description of risks

**Report on assessing the vulnerability to corruption of internal regulations**

<table>
<thead>
<tr>
<th>Field of activity</th>
<th>Title and the object of the regulation</th>
<th>Issuer (Parliament, govt. etc.)</th>
<th>The category of regulation[1]</th>
<th>Number of article</th>
<th>Text (extract of the normative act appraised)</th>
<th>Elements / factors that potentially may favour corruption</th>
<th>Possible or actual corruption situations [2]</th>
<th>Recommendations / proposal to change</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

[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

<table>
<thead>
<tr>
<th>Factor</th>
<th>Score</th>
<th>Description</th>
<th>Indicators</th>
</tr>
</thead>
</table>
| Almost certain       | 5     | most likely will occur > 80% chances of occurrence | • is expected to occur in most professional circumstances;  
                                          • no doubt it will happen eventually frequently;  
                                          • imminent.                                                                                         |
| Probable             | 4     | considerable chance of occurrence, it is not uncommon 61% - 80% chances | • 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 | • in certain circumstances may arise profession;  
                                          • can happen occasionally;  
                                          • happened elsewhere in an industry similar.                                                       |
| Highly unlikely      | 2     | minimum, but not impossible, it is not known to have occurred 21% - 40% şanse de apariție | • can only occur in exceptional professional circumstances;  
                                          • not expected to happen;  
                                          • has not been reported in the business.                                                            |
| Improbable           | 1     | Virtually impossible, it never appeared 0% - 20% | • is likely to never happen;  
                                          • unlikely to ever happen.                                                                            |
## Stage III - Risk assessment

### Scale to estimate the overall impact of risk

<table>
<thead>
<tr>
<th>Factor</th>
<th>Score</th>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>major / critical</td>
<td>5</td>
<td>• 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.</td>
</tr>
<tr>
<td>high</td>
<td>4</td>
<td>• 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.</td>
</tr>
<tr>
<td>moderate</td>
<td>3</td>
<td>• 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.</td>
</tr>
<tr>
<td>low</td>
<td>2</td>
<td>• 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.</td>
</tr>
<tr>
<td>very low</td>
<td>1</td>
<td>• 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.</td>
</tr>
</tbody>
</table>
### Stage III - Risk assessment

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

<table>
<thead>
<tr>
<th>Question 1</th>
<th>Question 2</th>
<th>Question 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do measures deal effectively with the identified risks?</td>
<td>Are the measures well documented and communicated officially to the those interested or involved?</td>
<td>Are the established measures operational and applied consistently?</td>
</tr>
<tr>
<td>no</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>partially</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>yes</td>
<td>6</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total I₁</strong></td>
<td><strong>Total I₂</strong></td>
<td><strong>Total I₃</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Level</th>
<th>Score (I₁+I₂+I₃)</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>inefficient</td>
<td>3</td>
<td>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.</td>
</tr>
<tr>
<td>reduced/weak</td>
<td>4</td>
<td>the measures deal with the risks, at least partially, but the documentation and/or the application must be improved and adapted considerably;</td>
</tr>
<tr>
<td>good</td>
<td>5-6</td>
<td>the measures deal with the risks, but the documentation and/or application require improvement</td>
</tr>
<tr>
<td>very good</td>
<td>7-12</td>
<td>the measures deal with the risks, are well-documented and implemented;</td>
</tr>
</tbody>
</table>
## Stage III - Risk assessment

Data sheet concerning the description and assessment of corruption risks

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

### Measures to prevent / control existing currently

<table>
<thead>
<tr>
<th>Efficiency of the measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
</tbody>
</table>

### Additional measures to prevent / control the risk

<table>
<thead>
<tr>
<th>Risk responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
</tbody>
</table>
## Stage III - Risk assessment

<table>
<thead>
<tr>
<th>RISK CATEGORY</th>
<th>PRIORITATE</th>
<th>ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>High/extreme risks</td>
<td>Priority 1</td>
<td>Needs concentration of attention of leadership for adopting URGENT measures to prevent/controll corruption risks</td>
</tr>
<tr>
<td>Moderate risks</td>
<td>Priority 2</td>
<td>Risks may be MONITORRED or controlled, either by increas the efficiency of present measures or by adopting suplimentary controll measures</td>
</tr>
<tr>
<td>Minor risks</td>
<td>Priority 3</td>
<td>Risks may be TOLERATED and will be considered inherent to the activities. Suplimentary measures are not needed, but only applying existent ones</td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>Description of risks</th>
<th>Assessment of the risks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Parametrii riscului</td>
</tr>
<tr>
<td></td>
<td>probability</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The corruption threat</th>
<th>causes</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
</tr>
</thead>
</table>

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

<table>
<thead>
<tr>
<th>The corruption threat</th>
<th>Suplimentary measures</th>
<th>Term</th>
<th>Risk responsible</th>
<th>Assessment of the control measures</th>
<th>Monitorring and revision of the risks</th>
<th>Assessment of revised risks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>indicators¹</th>
<th>Corruption cases²</th>
<th>probability</th>
<th>Global impact</th>
<th>exposure (col. 8 x col.9)</th>
<th>priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
<td>7</td>
</tr>
</tbody>
</table>

¹ For each of the measures
² According to the description of the threat
Export Raspunsuri Chestionar

Organizații (Câmp obligatoriu)

- INSPECTORATUL DE POLITIE AL JUDEȚULUI IASI
  - ADMINISTRAREA PATRIMONIULUI IMOBILAR SI INTENDENTA
  - ANALIZA SI PREVENIREA CRIMINALITATII
  - APELURI DE URGENTA

Exportă
Asociere risc la incident de integritate

Județ:
ARGES

Nume structură

Structură:
INSPECTORATUL DE POLIȚIE AL JUDEȚULUI ARGES

Domeniul Activității:
Structura de reținere și arestare preventiva

Activitate vulnerabilă:
efectuarea serviciului de paza 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.I. 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

<table>
<thead>
<tr>
<th>Număr acte materiale</th>
<th>Soluție</th>
<th>ani:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alege</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Agentii

<table>
<thead>
<tr>
<th>Număr acte materiale</th>
<th>Soluție</th>
<th>ani:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alege</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Vizualizare incident de integritate

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

Conținut

Documente Asociate:

Rapoarte de Evaluare:

Alte Documente:

<table>
<thead>
<tr>
<th>Domeniu de activitate</th>
<th>Activitate vulnerabilită</th>
<th>Nr. acte materiale și soluții</th>
<th>Risc</th>
<th>Nume Utilizator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Structura de retinere și arestare preventiva</td>
<td>efectuarea serviciului de pază și supraveghere a persoanelor private de libertate</td>
<td>Ofițeri</td>
<td>Introducerea sau facilitarea introduserii de bunuri interzise în C.R.A.P.</td>
<td>Mihai Barlici</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Nr. acte materiale: 2 Șolutie: Condamnare cu suspendare Ani: 2 Luni: 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Nr. acte materiale: 6 Șolutie: Condamnare cu suspendare Ani: 3 Luni: 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Descrierea amenințării de corupție</td>
<td>Termene</td>
<td>Responsabil(i) de risc</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------------</td>
<td>--------</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Măsuri suplimentare</td>
<td>Monitorizare și revizuire</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evaluarea măsurilor de control</td>
<td>Parametrii riscului revizuit</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indicatori de evaluare</td>
<td>Evaluare masură</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Riscuri de corupție materializate</td>
<td>Probabilitate</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact global</td>
<td>Expunere</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prioritate</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Structura de reținere și arestare preventiva**

- **Introducerea sau facilitarea introducerii de bunuri interzise în G.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 ocazie desfasurarii acestor activități (arme, cutite sau alte obiecte întreținută faietoare, componete electronice pt. telefoane mobile etc.)
  - amenajarea intrării în camerele de arest cu dispozitive de detectare a obiectelor interzise prevăzute cu înregistrarea fluxului

- **Monitorizarea continuă a documentelor din dosarele de penitenciar și executarea controlului privind respectarea programului zilnic**

- **Structura de reținere și arestare preventiva**

- **25/07/2014**

- **Ig Iacă Conaliere**
  - Număr controale

- **Șeful CRAP, Șeful Serviciului Logistic**
  - achiziția de dispozitive și asigurarea instruirii
  - puncte de acces amenajate

- **25/07/2014**