

BUILDING INTEGRITY SELF ASSESSMENT
PEER REVIEW REPORT

REPUBLIC OF MOLDOVA

OVERVIEW

1. The Building Integrity Self-Assessment Questionnaire and Peer Review Process is a part of the practical tools developed in the framework of the NATO Building Integrity (BI) Programme. The BI Self-Assessment Questionnaire (SAQ) is designed to provide nations with a snapshot of current structures and practices. The subsequent BI Peer Review Process helps nations to confirm areas of good practice and those that may require further efforts. The BI Programme is focused on providing practical assistance with Defence reform and helping nations meet their anticorruption obligations within the UN and other frameworks.

2. The Peer Review Team noted that the highest leadership of the Ministry of Defence of the Republic of Moldova takes forward NATO's integrity building and anticorruption programme. Participation in BI activities is increasing, notably since the decision to participate in this initiative and Allies' decision to enhance practical cooperation with the Republic of Moldova. It includes the participation in the BI Peer Review Process and an increased, but not yet systematic, participation in BI education and training activities. In addition, BI has been included as new goal in partnership tools in the NATO-Moldova Individual Partnership Action Plan (IPAP) for 2014-2016, in the Partnership for Peace Planning and Review Process (PARP) 2014 Partnership Goals and is an important component of the Defence Capacity Building package endorsed by NATO Defence Ministers on 24 June 2015. Furthermore, it is worthwhile to note the recent participation of highest defence leadership (Adviser to the Minister of Defence and Deputy Minister of Defence participated in the Professional Development Programme conducted under the South Eastern Europe Defence Minister process¹, in the NATO Building Integrity Senior Leaders Day conducted in December 2014 and in the NATO Building Integrity 2015 Conference in Washington, USA).

3. This report is focused on the Peer Review of the Self-Assessment Questionnaire completed by the Moldovan Ministry of Defence (MOD) to

¹ The Ministry of Defence of Moldova also hosted a workshop in May 2014.

which all directorates and agencies, and all branches of the armed services were requested to respond. Meetings and interviews were conducted between 22 and 24 October 2014, and 22 and 23 July 2015², with key personnel of the MOD and the Armed Forces. Also attending were the Deputy President of the Parliamentary Committee on National Security, Defence and Public Order and senior representatives from other national agencies including the Anti-Corruption Centre and representatives from local NGOs.

4. The Moldovan reply to the Self-Assessment Questionnaire was relatively detailed and provided essential information in most areas. Input from the Joint Staff appears to be limited as military aspects of personnel management were not fully addressed. The commitment shown by senior leadership, MOD officials and personnel in the Peer Review meetings was very good and frank. The NATO BI Team found the MOD personnel committed, showing a strong will to strengthen integrity, transparency, accountability as well as enhancing good governance within the MOD and Armed Forces. The risk of corruption in the MOD and Armed Forces is widely understood, as is the effect of such corruption. There is a strong history of corruption in Moldova and currently the ability to correct the number of systemic issues is limited and challenging.

5. The National Anti-Corruption Center (NAC) is a state structure reporting directly to the Government and is primarily aimed towards combating economic crimes and corruption in the Republic of Moldova. The NAC is responsible for the implementation of the National Anti-Corruption Strategy for 2011-2015, which is updated and approved by Parliament on an annual basis. The Court of Accounts which is the State level Audit department carries out bi-annual audits in the MOD and Armed Forces, however there is little evidence of corrective action being taken to address issues raised in their reports. There are no Internal Auditors in the MOD, the only checks carried out are by the General Inspection Directorate. The lack of an internal audit department should be addressed as a matter of urgency.

6. Local NGOs and media's interest in defence matters is pretty high. The MOD developed a systematic communication approach ("Communication Strategy") to better inform representatives of the civil society on reforms undertaken in the defence sector. However, the NATO BI Team and the MOD leadership recognize considerable lack of knowledge on how to report corruption related issues in the defence sector though there is a real willingness to improve individual skills and how to further address national

² The completion of the process was delayed due to the political calendar.

strategy of communications regarding the defence and good governance reforms. Notwithstanding these initiatives, at the present time, anticorruption measures are perceived in general by society at large to be insufficient and ineffective to meet the overwhelming number of systemic occurrences of corruption.

7. The NATO BI Peer Review Team noted that, while there is several training activities being initiated, there is no routine, comprehensive anticorruption training or Building Integrity training for civilian or military personnel. The potential risk of encountering corruption while on operations is not specifically highlighted during pre-deployment training. Moreover, it appears that there is no special training for contracting personnel who may be deployed on operations in support of Moldovan units.

8. Interviewees and the NATO BI Team noted that the MOD's annual funding is limited to only essential items with limited scope for investment or development. This clearly leads to a degree of frustration with personnel who are committed to the development of the Moldovan defence force preempting any reforms including professional development of personnel and preventing from any reforms and transformation

9. The Peer Review Team noted the following examples of good practice:

a. The integration of BI in NATO partnership framework - Individual Partnership Action Plan (IPAP), Partnership for Peace Planning and Review Process (PARP) and in the related Defence and Security Capacity Building (DCB) Package.

b. The availability of telephonic hotlines and the contact numbers of which has been published on the official website of the Ministry of Defence.

c. Existence of a Code of Conduct for the military staff and for public officials in addition to annual evaluations of personnel provide normative basis to ensure accountability of MOD personnel.

10. The Peer Review Team offers the following general recommendations for Moldova's consideration:

a. Develop an MOD internal action plan (so-called "Integrity Plan") to address the recommendations from this report and how best to take this advice forward. Likewise, the establishment of a BI Working Group is recommended to facilitate the elaboration of this action plan. The NATO BI experts could be requested to return for any follow-on action as necessary, to

perform a review of progress or other assistance as determined by the MOD in consultation with NATO.

b. Continue to make maximum use of existing partnerships tools and mechanisms to streamline efforts and embed transparency, accountability and integrity in the Moldovan defence and security sector.

c. Expand resulting recommendations from the NATO BI Peer Review Report to the overall defence and security sector.

d. Encourage senior leadership to continue to promote professional development of personnel and support participation of staff in education and training activities. A systematic and comprehensive anticorruption training for all civilians and military personnel should be initiated. The development of pre-deployment anticorruption training module for all deploying units should be developed while specialist training on procurement and financial management for those personnel being sent abroad should be considered as well.

f. Encourage senior leadership to continue to openly promote the programme to build integrity and increase transparency by developing an information campaign (internal and external). For example, a plan could be developed to further improve and increase relations with the media and NGOs to raise awareness of the participation of the MOD in the NATO BI Programme, the activities of the MOD and Armed Forces including the implementation of recommendations from this Report.

g. Urgently consider establishing an Internal Audit Department within the Ministry of Defence which would report directly to the Minister and begin unscheduled audits on major procurement projects and asset disposals.

e. Review the Military Human Resources system and consider implementing a new modern system including establishing a standard salary system based on rank only.

g. The Moldovan MOD should also benefit from NATO and regional political support including from regional cooperation framework such as the South Eastern Europe Defence Ministerial (SEDM) process.

REPUBLIC OF MOLDOVA

BUILDING INTEGRITY SELF ASSESSMENT

PEER REVIEW REPORT

I. DETAILED FINDINGS AND COMMENTS

DEMOCRATIC CONTROL AND ENGAGEMENT

1. The Government of Moldova is the central executive authority which is responsible for the enforcement of the laws and ratified decisions of the Parliament and of Presidential decrees. The role of the Government within the defence and security sector includes issue of orders and the monitoring of implementation; in accordance with state laws, approves the structures and functions of these bodies. It also approves and controls budget allocations.

2. In accordance with the Constitution of the Republic of Moldova the Parliament is the supreme representative body and the legislative authority of the state. The Parliament is responsible for: approving the Concept of National Security; ratification and denunciation of international treaties on state security; approving State's military doctrine; appointment of Minister of Defence; appointment of Deputies to the Minister of Defence; approving all budgetary allocations for defence and state security. However Parliament has a very limited role in the development and definition process of the national security policy.

3. Democratic control of the Moldovan Armed Forces is regulated by the Moldovan Constitution of 1994. This stipulates that the Parliament is the supreme representative body and as such is the only legislative authority of the state to decide on declarations of war and conclusions of peace and takes decisions regarding involvement in military operations other than war.

4. In order to fulfill the constitutional requirements of security management the President is assisted by the Supreme Security Council (SSC). This SSC is comprised of a secretariat and Council voting members including the Prime Minister, the Minister of Defence, the Chief of the General Staff, the Minister of Finances, the Minister of Internal Affairs, the Minister of Foreign Affairs and the Supreme Security Council. The SSC is an advisory body which reviews activities within the security sector and provides advice and recommendations to the President. The SSC is considered by both national and international experts to be outdated and lacking impartiality. It is

considered that the current model of the national security system leads to lack of transparency and effective democratic control.

5. Within Parliament, the Committee National Security Defence and Public Order (CNSDPO) has significant responsibilities in all defence matters and security oversight related functions of the Parliament on a routine basis. This committee is comprised of eleven members elected by Parliament and includes a chairman, two deputies, a secretary and seven members. The duties of the CNSDPO include but not limited to: national security issues, fighting crime, corruption, terrorism, reform of the Armed Forces including the Carabineers troops, service conditions of military personnel and social and legal protection of the military. The Carabineer troops are under command of the Ministry of Interior but during transition to war will form part of the defence forces. The CNSDPO provides reports and recommendations to the Parliament on MOD's budget including budget proposals for future years. It appears that the committee does not carry out any in depth analysis of budgetary performance or future requirements and therefore their recommendations are not fully supported by factual evidence.

6. The Minister of Defence is appointed by the President in accordance with the law. The Minister of Defence is accountable for the activity of the Ministry to the Government and as a member of the Government - to the Parliament. The Minister of Defence is assisted by two deputy ministers who are also appointed by the President. The Minister of Defence does not have the authority to appoint or dismiss the Chief of Defence but will make recommendations to the President who will make the final decision and issue a presidential decree.

7. The National Security Concept is the fundamental document that controls the direction and general principles of national security for the Republic of Moldova. The first National Security Concept document was adopted in law in May 2008 and has been made public. The National Security Strategy was first adopted in law in July 2011 and has been made public. It sets the objectives for the maintenance and development of the institutions within the security sector. From this document individual ministries should develop their own realistic management plans.

8. There is an Ombudsman institution at national level led by the Center for Human Rights of Moldova. They have close links with UNDP who has been cooperating closely with Moldova's Ombudsman Institution. It has helped to establish and maintain a free hotline that gives people from outside the capital the chance to report human rights infringements. Also, it has helped to develop strategic partnerships between national authorities and civil

society organizations – including the media – to better promote and protect human rights.

9. The MOD understands and acknowledges the importance of civil engagement and accountability to the public. The MOD put in place a Communication Strategy in 2010. This strategy complies with national legislation and sets the principles for public relations within the MOD which will be reviewed within the guidance of NATO experts within the Capacity Building Initiative Package.

10. Public Affairs component comprises a Public Affairs Office in the Ministry of Defence which has two members of staff. At the General Staff level, there is a public affairs officer/spokesperson to the Commander of the National Army. There are also Public Affairs Units in two Brigades, one in the Peacekeeping Battalion and one located at the Military Academy. The Ministry of Defense also has a Military Mass Media Center with 21 personnel. This is an independent unit in charge of multimedia products: TV, radio, magazine and social media.

11. The MOD enjoys a relatively healthy relationship with the media and public. The MOD receives approximately 20 written enquiries monthly. These enquiries are passed to the appropriate department for information after which the media department on behalf of the MOD responds, the response time is approximately 3-10 days from the date that the enquiry is received depending on the complexity of the information sought. The questions raised are varied but cover subjects such as; budgets, conscription, allegations of corruption in the MOD and Armed Forces, operational deployments, procurement of operational equipment, behavior of soldiers, and communications with NATO.

12. There are no regular meetings with the media or NGO's, these are valuable conduits to the public and provide opportunities for the MOD to demonstrate their transparency and openness. Despite the limited number of staff in the media department, regular meetings could be scheduled, for example, quarterly meetings with the Minister to which all interested media outlets are invited where the Minister would provide a brief overview, 10-15 minutes on the past months' developments and future plans and then allow the journalists to ask questions. This would only take an hour of the Minister's time every three months, however these could be longer depending on developments in the ministry and other newsworthy information.

13. When senior staff are requested to give interviews, whether to a journalist or on television they should stress their commitment to the BI initiative and highlight steps taken or planned to build integrity in the defence sector. Only staff who have been approved are allowed to liaise with the media.

14. In addition to the MOD website (www.army.md) which is available in Romanian and English languages, there are television and radio programs ("Voice of the Army"). The radio transmissions are weekly and the television broadcasts are twice a month with repeats also shown twice a month. A magazine is produced monthly, "Moldovan Army" which is freely available on the MOD website and to the public at a very small cost, however sales are very small. The NATO BI Team recommends that BI articles should be included *inter alia* the Integrity Plan, interviews of officials and senior military personnel who can highlight areas which require attention and what the plans are to implement changes. Interviews of civilian and military staff who participated in NATO BI Education and Training activities could also be published. The MOD should, through all media outlets highlight where there has been success and what the results of these successes have been. It was clear that there is an urgent need for further training in all aspects of dealing with the media.

15. The website could be expanded to provide details on the regular briefing meetings with the Minister, dates, venue and times of these meetings could be published there. Journalists and NGO's could be asked to respond to the schedule of meetings confirming their attendance and providing advance notice of issues they wish to raise.

16. It was noted by the team that there are no regular meetings scheduled with external media or with NGO's. Press conferences are organized as and when deemed necessary. There was little evidence of a good working relationship having been established between the NGO's and the MOD. The NGO's criticized the MOD for not engaging them and for not being invited to participate in MOD's public discussions.

17. The team noted that there is not a great deal of trust or connection between the MOD and NGO's. NGO's criticized the MOD for not engaging with them and for not being invited to participate in MOD's events and the MOD criticized the NGO's for being politicized and/or incompetent. These relationship issues should be addressed through discussion and clear objectives set to establish a way forward to promote a better relationship.

18. The following recommendations can be effected with limited financial resources and the outcomes and benefits will far outweigh any limited financial resources required. The NATO BI Team remains at the disposal of the Ministry to address this issue and facilitate the exchange of good practice.

RECOMMENDATIONS

- a. Develop a media strategy which includes regular monthly briefings by the Minister to journalists and NGO's.
- b. Promote a more interactive relationship with NGO's.
- c. Through the media and NGO's promote the BI Programme and the MOD's commitment to implementing it.
- d. Establish weekly meetings with media, NGOs and open to the wider public.
- e. Urgently discuss with NATO the requirement for media training.
- f. Include regular articles on the implementation of BI and interviews on this with the Minister and Senior Military Personnel.
- g. Highlight the success of the 'Hotline' managed by the Inspector General. Advertise the 'Hotline' in every issue and provide statistics on the use of this valuable BI tool.

19. The NATO BI Team is ready to provide further assistance on promoting reforms undertaken in the defence and security sector, including in facilitating regional cooperation and lessons learned from other countries as well as the conduct of specific training and assist the attendance of personnel in such training.

NATIONAL ANTI-CORRUPTION LAWS AND POLICY

20. Moldova is a member of several international anticorruption treaties and agreements: in 2007 it acceded to the United Nations Convention against Corruption (UNCAC); in 2004 it ratified both the Council of Europe Civil Law Convention on Corruption (CETS No 174) and the Council of Europe Criminal Law Convention on Corruption (CETS No 173). Moldova

also became a member of the Group of States against Corruption (GRECO) in 2001.

21. The GRECO Evaluation Report Round III was adopted by the Republic of Moldova in April 2011, it contained 17 recommendations with a deadline of 18 months for the implementation of the recommendations. The Moldovan authorities submitted a situation report in November 2012 which formed the basis for the Compliance Report. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and provides an overall appraisal of the level of the member's compliance with these recommendations. The implementation of any outstanding recommendations (partially or not implemented) will be assessed on the basis of a Situation Report to be submitted by the authorities 18 months after the adoption of the present Compliance Report.

22. In October 2012 the National Anti-Corruption Center (NAC) was established. It reports directly to the Government and currently comprises of 350 personnel. The main role of the NAC is; preventing, disclosing, investigating allegations of corruption and acts related to corruption; drafting and amending legislation relating to corruption; providing advice and training on anticorruption and the promotion of integrity and with assistance with the development of Integrity Plans. Additionally it is responsible for the ongoing development and implementation of the National Anti-Corruption Strategy 2011 - 2015.

23. To align national legislation with the provisions of the UN Convention against Corruption, the NAC has developed two draft laws, which have produced a number of amendments to the *Criminal Code*, the *Criminal Procedure Code* and other legal acts.

24. The NAC are also responsible for carrying out financial and integrity checks on public officials to identify and eliminate risks that would cause or facilitate acts of corruption or improper influence. These checks are carried out frequently and detailed records are maintained. These records are not public due to the confidential nature of the information.

25. The NAC are currently involved in a large number of alleged corruption cases some of which involve high level officials, for example nine judges are under investigation with two already serving prison sentences, other cases are ongoing.

RECOMMENDATIONS

- a. Develop a plan to further raise awareness and education of the general public concerning on-going reform initiatives, aiming at public support for deeper implementation of the Anti-Corruption Strategy.
- b. In addition to reliance on background checks, ensure financial disclosure reporting requirements are rigorously followed for persons in senior or sensitive positions (e.g. key procurement posts), while reinforcing efforts to develop respect for the rules on conflicts of interest.
- c. Review and reinforce the necessity for implementing the obligation to report gifts received by officials and employees in state bodies during protocol activities, as well as other measures and activities to eliminate opportunities for corruption.

ANTI-CORRUPTION POLICY IN DEFENCE AND SECURITY

26. Promoting transparency and building integrity in the MOD and Armed Forces is a high priority for the Ministry of Defence. This is evidenced by the participation of the MOD and AF in the NATO BI Programme. Corruption is endemic in Moldova and using the annual Transparency International Corruption Perception Index (CPI) as a reference in 2012 Moldova scored 36 points and ranked 94th out of 178 countries, however the situation in 2013 was slightly worse, Moldova scored 35 points and were positioned 102nd out of 177 countries and 103th *ex aequo* with Bolivia, Mexico and Niger in the TI Corruption Perception Index for 2014. This situation is despite international advice and assistance and the establishment of a new National Anti-Corruption Center. There needs to be a greater effort in bringing to justice those who are currently being investigated and those who have been investigated but so far action is pending.

27. The corruption risks identified in the MOD and AF include; passive corruption; influence peddling; unlawful acceptance of gratuities; receiving or giving of bribes; active corruption.

28. The MOD considers the following areas to be those most at risk from corrupt practices:

- a. Central Military Clinical Hospital - an institution which provides skilled and specialized medical assistance to the personnel of the National Army;

- b. Acquisition Department (Procurement) - responsible for the procurement of goods and services and for construction and repair contracts;
- c. Military Cathedra - education institutions of the active reserve of the Armed Forces;
- d. Military Academy of the Armed Forces - the higher military educational institution of the Armed Forces;
- e. Economic and Financial Directorate - the institution responsible for financial planning and budget management.
- f. Military Centers dealing with mobilisation and conscription (this is considered to be an area requiring urgent attention);
- g. Military Human Resources - responsible for personnel records, recruitment; promotion; participation on internationally funded courses; selection for deployment.

29. In 2013 when the BI process has been initiated, the Minister of Defence himself supported engaging in the NATO BI Programme and completing the SAQ to identify the corruption risk areas in the Moldovan Defence system and intends that his staff should work closely with NATO experts to mitigate the risks currently faced.

30. The General Inspectorate is the institution within the Defence system that is principally responsible for combating and preventing corruption. It is a law-enforcement unit directly under the Minister of Defence. It is responsible for administering the National Anti-Corruption Strategy 2011-2015 and ensuring that those elements appropriate to the defence sector are implemented.

31. The General Inspectorate was responsible for 21 functions, however these have recently been reduced to only 9. As part of the restructuring the General Inspectorate has lost all responsibility for the oversight of financial and economic activities. Responsibility for these economic activities has not been reassigned, this has resulted in a very serious loss of supervisory control as there is no audit functions in the MOD and they are relying on the

biannual audit by the Court of Accounts. Law No 939 as of 16.08.2007, within the central apparatus of the MOD there is an Audit Service. During 2014-2015 certain measures have been undertaken such as an open and public competition to fill the position of Auditor. However, specific and urgent action should be taken to remedy the situation including measures to fill this lack of personnel. The General Inspectorate continue to carry out activities related to their nine functions which includes; personnel discipline, violations of citizens' rights and interests by MOD personnel, bribery in the Defence system, abuse of power by MOD personnel, protection of classified information and other violations included in law within the MOD. The General Inspector also conducts scheduled and unscheduled inspections, investigates complaints received from MOD and military personnel as well as those from outside of the MOD. The General Inspector has provided three 'hotlines'. The 'hotline' numbers are advertised and people using the service can remain anonymous if they wish. Outside of office hours calls are diverted to the official cell phone issued to the General Inspector. Calls to the hotlines have increased in the last three years, 2011 fourteen calls, 2012 fifteen calls and 2013 twenty seven calls. The General Inspection Directorate comprised of only 7 staff, which, given the wide range of responsibilities appears to be significantly understaffed, however since the first Peer Review visit, the number of staff has reduced to only 5. There are difficulty in filling positions which become vacant as there is a reluctance by young officers to move to the General Inspectorate.

32. It was confirmed by the Inspector General that gifts may be accepted by members of the MOD and Moldovan Armed Forces (MAF). It is the responsibility of the General Inspectorate to ensure that all employees comply with the Special Order regarding the handling of gifts. All gifts must be entered into a Gifts Register and the list of gifts is available on the MOD's website. Only gifts with a value of less than 1000 Lei (approx. Euro 50) may be accepted. All gifts above that limit must be reported to the Minister through the General Inspectorate and may be referred to the NAC. The gift register is subject to scrutiny and audit by the General Inspectorate.

33. To promote integrity and to prevent corruption there is a law in place covering "Whistle blowing". However it is felt that whistle blowing measures are weak in Moldova. Civil servants who report cases of corruption or abuse of office are not adequately protected from recrimination either in law or in practice. Even newly adopted regulations do not provide protection from recrimination cases or other negative consequences of those who would report cases of corruption. The US State Department in 2013 recommended as part of the ongoing Justice Sector Reform Strategy that all government agencies must create additional regulations regarding whistle blowing; the

NAC is responsible for ensuring this. Moreover, the general public view or perception appears to be that by reporting any incidents of perceived corruption would not change anything or by making a complaint may even create more problems.

34. Currently the MOD has no Internal Audit Department and relies on bi-annual audits being carried out by the Court of Accounts (COA). The Court of Accounts is the supreme audit institution in Moldova. Its objectives include assessing the management of public financial resources and assets and promoting the internationally recognized standards on transparency and accountability in the area of public financial management. However, following their audits of the MOD which have highlighted a number of areas of concern there is little evidence of corrective action being taken to address issues raised in their reports.

35. Reports resulting from audits, once finalized, are made public and are available electronically. The last audit carried by the COA of the MOD was in 2012, prior to that 2009. These last two audits identified a number of problems including but not limited to: exceeding delegated contractual finance limit; splitting contracts to remain within the delegated financial limit; poor contract management; lack of experienced personnel sitting on tender boards; poor quality of goods received. These issues all indicate serious problems within the MOD Procurement Department and pose significant risks of corruption. The system of procurement within the MOD is a mixed one of electronic and paper tenders and contracts. In the opinion of the COA this system detracts from an effective and transparent procurement system and requires urgent attention. It was stated that the government often ignores or gives only superficial attention to the audit reports which appears to be the case also in the MOD. The findings and recommendations of the agency are rarely implemented by the executive.

36. The COA has 150 staff of which 100 are auditors. This number is insufficient to provide the level of audit required particularly when 40% of State Bodies have no internal audit.

RECOMMENDATIONS:

- a. Urgently produce and start implementing a BI plan (Integrity Plan) for the MOD and MAF and ensure that it is co-ordinated with the MOD Anti-Corruption Strategy.
- b. As a matter of urgency, establish an internal audit department reporting directly to the Minister of Defence, this would be a separate

department outside of the General Inspectorate. Duties should not duplicate those of the General Inspectorate.

- c. As a matter of urgency, fully establish an electronic procurement system.
- d. Facilitate communication and co-operation among the Moldovan Court of Auditors, the General Inspection Directorate and National Anti-Corruption Center.
- e. Consider establishing a special office within the General Inspection Directorate, whose sole responsibility would be the coordination of all anti-corruption work of the MOD and identify to whom that official would report.
- f. Address the weaknesses in the current whistle blowing system ensuring that those who wish to use it are protected and believe that their report will be actioned.
- g. Urgently address the loss of responsibility for economic supervision and identify where this function should be established.

PERSONNEL-BEHAVIOR, POLICY, TRAINING, DISCIPLINE

37. Military regulations serve as the Code of Conduct for the military staff of the National Army of Moldova this was approved by Presidential Decree No 2327 in September 2009.

38. There is a dedicated Code of Conduct for Public Officials which was approved in Law in 2008. Public servants are aware of the Code of Conduct provisions in accordance with the Order of the Minister of Defence. Newly recruited civil servants are familiarized with the Code of Conduct during their probationary period and thereafter evaluated annually.

39. The Code of Conduct for Civil Servants establishes the rules of conduct required by civil servants, to reduce the risks of corruption and create a climate of trust between citizens and public authorities.

40. Violations of military regulations by military personnel are dealt with in the first instance by the Military Police, however if deemed necessary a commission is established and the case is passed to the prosecutor's office. The Military Police work closely with the Inspector General to put in place measures to minimize reoccurrences of the same or similar offences.

41. During the last two years a number of cases involving military personnel have been investigated and dealt with by the Military Police and General Inspectorate. These include, soldiers being absent without leave, physical violence, fraud and embezzlement.

42. There is no systematic anticorruption training within the Ministry of Defence or the National Army. This should be included as Building Integrity training and should form part of the regular training of both existing and new civilian staff, soldiers and officers. It was also confirmed that no BI training was provided on pre-deployment training courses but it was agreed that this was something that will be included on future pre-deployment training. The military academy have included as part of their curriculum lessons on building integrity, how to identify potential corruption risks, put in place prevention measures and what action to take if corruption is suspected. There is a related building integrity Masters course available at the local University which lasts for two and a half years.

43. The NAC provides training which both military and civilian personnel attend, this ongoing training is achieved through seminars and workshops on subjects such as, Conflict of Interest, Detecting and Denouncing Corruption, Code of Ethics. In addition to the BI training offered by the NAC the General Inspection Directorate also arranges courses. The external courses organized by the NAC are held at the Academy of Public Administration which is subordinated to the President.

44. According to Law No 1264-XV passed in 2002 public officials, including judges, prosecutors, civil servants, state officials and military personnel who are covered by this law must provide annually a declaration of:

- Their income;
- Personal and real assets;
- Financial liabilities, including those of immediate family members;
- Share of securities, including those of immediate family members;
- In accordance with the regulations the HR Department must collect these declarations and send them to the National Integrity Committee which in turn will verify the statements and publish them on their website for public perusal.

45. The General Inspection Directorate initiated bilateral cooperation with their counterparts in the U.S. Army, this was to assist them in the development of plans to combat the systemic corruption in the Moldovan Defence system. Subsequently in November 2011, two members of the General Inspection Directorate participated on the course "Legal Issues Against Corruption" which was funded and organized in the US. In March

2012 officers from the General Inspection Directorate attended the International Conference on Combating Corruption organized by the European Center for Security Studies (George Marshall Center) and held in Bucharest;

46. There is a Code of Conduct for both Military and MOD civilian personnel. Military personnel do receive special training in the laws which regulate discipline. This training is undertaken upon initial entry to the service, as well as within their units during their entire period of service. Military regulations serve as the Code of Conduct for military staff. Civilians are required to be aware of the Code of Conduct which is a legal document.

47. It was agreed that there were some shortcomings in human resource management, particularly as they relate to corruption risks. The performance of civil servants is assessed every six months. This assessment is to determine if the individual's performance meets the standard set for the position, future promotions and for the award of a bonus. This bonus system is used as a tool for managers to foster better cooperation with the individual and to motivate them to continue to perform well. It was agreed that the assessment of individuals by several managers is subjective, what is deemed as an excellent performance by one may be only seen as acceptable by another. It is recommended that this system is reviewed as it leads to disparity and may be considered as a risk of corruption. Training is provided to managers who carry out the written performance appraisals and make recommendations for the award bonuses, this to try and ensure that the standard making system is equitable.

MILITARY PERSONNEL MANAGEMENT

48. It has been reported to the NATO BI Team that the Military personnel management is not transparent and often positions are filled by personnel who do not have the required competencies or of an appropriate rank. Military personnel, in particular the lower level ranks, are appointed to positions on the basis of a HR Department assessment without any selection going through a public and transparent vacancy and application process. In addition to the problems created by moving personnel to positions of a higher rank on a permanent basis, particularly when not qualified, results on a discrepancy in the salaries system. The salaries of military personnel are based not only on rank but of position which is overly complicated and undertaken as an unfair system. This system of military salary payments is a hangover from the old soviet based system for payments and was common in many countries in Eastern Europe. Most countries have reformed their military rank and pay structures and these are now transparent and available

for public scrutiny. It is strongly recommended that both the Military and Civilian HR systems are restructured included salary systems.

49. It was confirmed that HR do not have a management plan which takes into account the rotation of military staff. Military personnel will follow their dedicated career path and will be appointed to positions as part of their career development. However the rotation of posts, whether civilian or military is considered an essential requirement for posts deemed “sensitive”. This is to reduce the risk of corruption, particularly in areas identified as high risk.

50. Military Promotions: Promotions for military personnel are assigned with an insufficient level of transparency based on an evaluation system lacking of consolidated requisites which can change every year.

51. Training courses for military. The military personnel is trained on anticorruption issues at the different levels. The military Academy has in their curricula programs of anticorruption delivered through conferences, seminars inviting guest speakers/lecturers and subject matter experts. All the personnel is addressed the legal aspects of the anticorruption and some Personal Development Training has been organized.

52. Selection for deployment; Moldavian Armed forces are not employed with complete units in Operation and many of them are pre-established before the operation. This situation opens the door to possible problem in the choice of the personnel selected to be deployed. A better and transparent system to select personnel to be deployed abroad is strongly encouraged. A Lesson Learned Procedure for Building Integrity best practice in Operation is completely missing.

RECOMMENDATIONS

- a. Consider an internal MOD publicity information campaign, with an appropriate anticorruption message to further reinforce on-going work;
- b. Specifically designate corruption-sensitive posts as those requiring special vetting and review procedures;
- c. Initiate a systemic and comprehensive anticorruption training programme for both civilian and military personnel. This should be done in conjunction with the BI action plan;
- d. Review personnel management policies, specifically rotation of persons in highly sensitive positions and the payment of bonuses based on performance assessments;

- e. To reinforce Military Regulations, consider the important benefits of developing a tailored Military Code of Conduct to guide the behavior of Moldova's armed forces, including those to be deployed on international operations;
- f. Produce a diagram showing the various departments within the MOD and MAF for inclusion in the training course for newly appointed personnel.
- g. Review both military and civilian HR systems with a view to undertaking a complete restructuring which will put in place a more professional and fair system;
- h. Completely restructure the Military salary system to put in place a more professional, fair and transparent system.

PLANNING AND BUDGETING (ACQUISITION PLANNING)

50. The Defence Policy and Planning Directorate is the lead for the implementation of BI within the MOD and AF. They are responsible for developing the BI plan and in conjunction with the General Inspector delivering the training. Currently there is no BI plan for the MOD and they are considering developing a national level BI plan but recognizes the magnitude of this task. The question was discussed as to whether the BI plan should be a national plan or an MOD plan. The advice from the team was clearly that the task of producing a national level plan would be too difficult and unwieldy; therefore the recommendation of the team was to produce an MOD plan and to provide assistance to other public sector bodies in the production of their own plans.

51. BI although addressing an old and persistent problem is a new concept and it was felt that external assistance would be needed to produce a plan and to start implementation in the near future. NATO BI can provide assistance on how to develop a plan at the request of the MOD.

52. There is no comprehensive system in place for acquisition planning. This is a reflection of the financial position of the MOD. Currently the MOD is allocated approximately 0.3% of the GDP, and of resulting financial allocation only 0.4% is available for capital investment, 62% is allocated to personnel costs and 34% for operational costs. Financing of operations is out with the MOD budget. Additional funding may be received through the leasing of

property, however this is a very small sum of money. The MOD are allowed to retain 20% of the income from the sale of surplus assets unless otherwise directed by the Ministry of Finance (MOF). The MOF retains 80% of the funds from the sale which is added to the State budget.

53. The Finance Department of the Ministry of Defence exercises procedural controls over the budget, prepares budget proposals and manages the in year finance. The Finance Department demonstrated a depth of knowledge both in terms of financial management but also planning and budget preparation. It would have been useful if the team had been provided with a schematic or diagram showing the structure of the MOD and MAF. This would also be a useful document to include in induction courses for newly appointed staff.

54. Planning of the future defence budget commences with the Ministry of Finance issuing guidance and indicative planning figures. Based on the guidance received the Finance staff collect all of the information and prepares a comprehensive budget proposal covering the next financial year and for two years following. Once the administrative work is complete on the draft budget proposals and internal meetings have taken place the agreed proposals are submitted to the Minister of Defence for approval prior to submission to the Ministry of Finance. The Minister will, along with his senior staff consider the proposals and once agreed will submit the draft budget proposals to the Minister of Finance.

55. The Ministry of Finance scrutinizes the budget proposals from all of the public sector bodies and after many meetings and discussions will submit the State budget proposals to the Government for consideration and approval. Following many meetings, discussions and adjustments the final draft budget proposals will be submitted to the Parliament for approval. The draft defence budget is submitted to the Parliament divided into the following categories:

- Personnel expenses;
- Operational expenses;
- Expenditure on infrastructure
- Individual programs;
- Receipts from sales; leasing or service provision.

56. Hearings on the general budget (including that of the Defence) are organized at the Government level, and can be followed by members of the public on the website www.privesc.eu. Data deemed to have a security classification of confidential or above is not available to the public.

57. There is always a healthy interest in the Defence budget by the media. The MOD budget is regularly published in the Official Monitor, once approved, it is published on the Ministry of Finance official page, and later published on the Ministry of Defence official page. The information available included cash allocation, division and program costs and the breakdown of the types of expenditure. Also available are the facts relating to individual capital investment separately.

RECOMMENDATIONS

- a. Arrange meetings with interested parties to discuss a plan for disposal of assets and obsolete equipment.
- b. Investigate where further receipts could be found from leasing to provide additional funds in the budget.
- c. Produce a schematic of the structure of MOD and the MAF and highlight where financial delegations are in place.

OPERATIONS

58. There is no specific military doctrine on how to address corruption issues for peace and conflict, and commanders are not trained on how to address corruption issues during deployments. Anticorruption matters related to operations are not routinely included in pre-deployment training for the Defence forces of Moldova. There are no dedicated training modules on the subject. It was agreed that it was important to highlight areas of risk which are not financial but are nonetheless corruption. Some risks are more likely to occur on operational tours, for example bribes at checkpoints for access.

59. Additionally there appears to be no legal arrangements in place to cover procurement in conflict environments when urgent operational requirements are encountered.

60. Training, outside of pre-deployment training, has been provided for officers, NCO's and sergeants on the avoidance of activities deemed to be corrupt. Moreover, information is regularly circulated to military and civilian personnel on the prevention of their involvement in corruption. There are clear guidelines for both military staff and civilians on acceptable behavior. These rules are set by the internal regulations of the Defence establishment.

61. An order has been approved which describes the process of acquisition within the Ministry of Defence. Each contract is registered in the economic and financial Directorate, where the contract is economically and financially re-examined. Then the contract is registered at the Public Acquisitions Agency. The Law on public procurement specifies that in case of conflicts of interest, they must be made public in the acquisition process, and the Commission will take this into account. Moldovan legislation does not provide procedures for accelerated procurement.

62. Currently, no doctrine or guidance exists within the National Army aimed at combating the scourge of corruption and conflict of interest. However, this area is governed by regulations / legislation adopted at national level (e.g. the National Anti-Corruption Strategy). At the same time, during the training sessions organized in the National Army, military units and institutions, lessons are conducted regularly to inform civilians and conscripts on the subject. The National Army does not define clearly the notion of "acceptable behavior", referring to corruption or conflict of interest. Moreover, national regulations do not cover all aspects and peculiarities of military service.

63. Unfortunately, the necessary training has not been organized for senior commanders to provide them with the tools to deal with corruption or conflict of interest. This needs to be addressed as a matter of urgency.

RECOMMENDATIONS

- a. As part of the BI plan ensure that all personnel receive training in integrity building. Ensure that senior officers receive BI training to equip them to deal with any issues relating to corruption in their Units.
- b. Include a module on anticorruption in pre-deployment training as a matter of policy.
- c. Develop a system to capture anticorruption lessons learned when units redeploy.

PROCUREMENT (ORGANISATION AND REFORM)

64. Moldova does not have laws specifically relating to defence and security procurement. All state procurement including Defence is regulated by laws that set the general legal and economic principles for conducting state procurement.

65. Currently a small amount of funding is allocated to individual military units who may negotiate contracts within their delegated financial limit. The delegated contractual authority at unit level is 50,000 Lei (approx. 2700 €) for each contract.

66. The procurement of goods and services exceeding 50,000 lei is conducted centrally within the Ministry of Defence. Following procurement planning, a set of acquisition documents are developed, indicating what goods, services or works will be procured and what documents are required to be prepared. These documents are entered into the electronic procurement system and sent to the Acquisition Agency (subordinated to the Ministry of Finance), for approval. Once approved, the procurement is published in the Public Procurement Bulletin, including the place and the terms of the public procurement procedure and other information required by the participants in this procedure. Previously procurement procedures were carried out concurrently in hard copy (paper) and electronically. However since the last visit the majority of procurements are made using the electronic system only. However there are still a limited number of contracts placed using a manual system, there are generally for lower value items such as fruit, vegetables, bread etc. All contracts have annuality and no contract can be placed for a period exceed the end of the current financial year. Whilst it is understood this is primarily due to the annuality of budgeting it can prove to be a more expensive system, particularly for longer period contracts, for example building repairs and renovations.

67. An "Acquisitions" Working Group is assembled for each public procurement procedure and participates in the opening of bids and the evaluation procedure. This working group is approved by the Ministry of Defence; members of the group are drawn from different directorates of the Ministry of Defence.

68. Once a member has been assigned as a member of the Acquisitions Working Group he/she is required to sign a statement confirming the following: he/she is not a spouse of any persons involved; is not a close relative of any of the bidders; in the past three years, according to entries in the labor book, was not an employee of any of the bidders; was not involved in any collaboration with any of the bidders; did not belong to any other governing or administrative body involved with any of the bidders; did not belong to the board of directors or any other governing or administrative body relating to the bidders. Each member confirms that he/she does not hold shares in the subscribed share capital or actions of bidders. If one of the members of the Working Group notes that he finds himself in one or more situations listed

above, he/she will notify the chairman of the group and rescind their position. A new member will be appointed.

69. The working group is responsible for ensuring; that a wide range of companies are invited to participate, that objectivity, impartiality and transparency are not compromised; ensures that the competition is fair and equal for all bidders; that economic and other aspects of the returned tenders are equally and fairly assessed and that the tender offering the best value for money is identified.

70. Operators are provided with the information reflected in the pre-selection documents, tender or other documents to attract offers, issue selection documents, tender or other documents to attract bids, with or without pay, and receive tenders submitted by operators in public procurement procedures. In the presence of bidders, the tender opening is prepared and in case the representatives of economic operators requiring it, it is submitted as a summons for countersignature.

71. Qualification of participants in procurement procedures are carried out in accordance with the requirements set out in selection documents or tenders to attract offers, to respond to economic operators over pre-selection documents, to attract bids in the time provided by law.

72. Tenders are required to be submitted by a specific time deadline. The bids will be opened on a specified date and time by procurement staff in the presence of the working group. The working group will then evaluate the returned tenders. Specialists will assess the quality of the goods or services offered by the bidders to ensure that standards are met. Records will be kept and evaluation of the content of the returned tenders will be compared with operators and a summons is prepared when the winning bidder of the procurement procedure is determined. Thereafter, information regarding the conduct of public procurement procedures are announced. Delivery of goods is made either directly to the military unit who submitted to request for contract action or to central warehouses.

73. The most advantageous economic tender is the one designated the winner, taking in consideration the price, delivery time, the payment conditions, profitability, quality and functional and technical characteristics. It had been noted that the Court of Accounts had in the past reported that the quality of goods received had been substandard. A system has been put in place to ensure that standards are met and that the quality of goods is acceptable and meets contractual requirements.

74. Electronic procurement shall be conducted on a compulsory basis by the Facilities Department for public tender procedures with the publication of the price offers request.

75. The electronic auction is a repeated process involving an electronic device for the presentation, in descending order of the new prices and / or of the new values concerning certain elements of tenders that are established after an initial full evaluation of the tenders, permitting their classification based on automatic evaluation methods. Certain agreements of works and certain service contracts having as their subject-matter intellectual performances, such as the design of works, cannot be subject of electronic auctions.

PROCUREMENT (SPECIAL TOPICS)

76. The goods, services and their estimated costs will determine the type of public procurement action to be taken. Public procurement procedures available are:

- Open (public) auction;
- Limited auction;
- Framework Agreement;
- Competitive dialogue;
- Negotiated procedures;
- Procurement from a single source;
- Request for bids pricing;
- Dynamic purchasing systems;
- Electronic auction; and
- Procurement plans for construction of social housing.

77. The procurement of goods, work and services may be procured from a single source tender action if:

- No suitable tender or no application has been submitted in response to an open or negotiated process, as long as the original terms of the contract are not substantially altered;
- For strictly necessary reasons of extreme urgency, as a result of some unforeseeable events for the concerned contracting authority, the deadlines for open or negotiated procedures with the publication of a participation notice cannot be met. The invoked circumstances to justify extreme urgency, must not be imputed to the contracting authorities; and
- Technical reasons, creative, concerning the protection of exclusive rights, or other objective reasons, a single operator has the goods,

works and services or a single operator has priority rights over them and there is no alternative, or economic operator is established by law.

78. In the case of public supply contracts, the contracting authority purchases only from one source in cases that:

- These goods are produced only for the purpose of research, development and experimentation;

This provision does not apply to quantitative production aimed to establish commercial viability of the product or to amortize research and development costs.

79. Generally although the MOD clearly stated that it complies with the law and regulations regarding state public procurement there is significant evidence provided by the Court Of Accounts that in the past there have been serious weaknesses in aspects of the acquisition and procurement systems. Since the team's last visit there has been a significant improvement in the procurement procedures and a number of points raised by the Court of Accounts have been addressed in the last year, for example there has been no financial 'splitting' of contracts to avoid financial scrutiny.

80. Concern was raised during the first visit of the team that a manual system and a paper system was being operated in tandem without an acceptable explanation. Since the first visit considerable progress has been made installing the electronic procurement system and the majority of all procurement is carried out using this new system.

81. It is confirmed that posts within procurement are not deemed to be sensitive and personnel are not rotated, this is despite procurement being identified as an area which is considered to be a high risk of corruption.

82. The law in Moldova does not provide for the use of off sets in contractual negotiations.

PROCUREMENT (ASSET DISPOSAL, DESTRUCTION, LEASING AND AUDITING)

83. Generally, the procedures of material goods for disposal and destruction are carried out in accordance with the instructions regarding the disposal of non-operational material goods, lost or embezzled, losses of cash in National Army military units and Ministry of Defence Institutions as well as the means of reporting about these losses has been approved by the order of the Minister of Defence in 2013.

84. The procedure of selling National Army assets is stipulated in “the Regulation of selling military technique, weapons and other military technical means available to the Armed Forces of the Republic of Moldova”, which is approved by the Parliament’s Decision from February 17, 1999. Usually, in the case of fixed assets sales, the entire amount is transferred into the Government account (Ministry of Finance). For other sales 80% of the obtained revenues will stay in the government’s account (the Ministry of Finance), 20% is transferred to the Ministry of Defence’s account, which can be used to cover its needs. The sale of fixed assets is based on a Parliament or Government resolution, according to the asset nature and the act in question may specify some specific provisions, e.g. that the entire amount to be transferred to Ministry of Defence, Ministry of Finance’ account, etc.

RECOMMENDATIONS

- a. Review the procurement system with a view to moving to a fully automated system.
- b. Review existing policies on open procurement to raise the percentage of such procurements to a higher level in line with accepted practice.
- c. Review the management of the procurement system and in particular the composition and the role of the “Working Group”.
- d. Review procurement procedures with a view to further simplify the process for lower value contracts.
- e. Determine if legislation is necessary in order to require companies which do business with the MOD to have a written code of ethics.
- f. Review the assessment of the posts within procurement and consider assigning these posts as sensitive, and introduce a rotation system for personnel, given this is an area identified as high risk.
- g. Consider the establishment of special procurement procedures for use in conflict environments.
- h. Produce an inventory of assets for disposal and a plan with an indicative timeframe.

ENGAGING WITH DEFENCE COMPANIES AND OTHER SUPPLIERS

85. The Ministry of Defence is working with operators through activities strictly regulated by the law on public procurement, which refers only to the procurement of goods in the interest of the Ministry of Defence. Weakness: In case of non-performance of a contract or general lack of implementation of a contract, a new auction will be required. Strength: Transparency and reduced risk of corruption.

86. As a means of combating corruption Ministry of Defence does not communicate with economic operators before the assessment of the acquisition procedure, only at the initiation of the acquisition procedure, related to forwarding the invitation of participation or dispatch of the document package. Activity with economic operators takes place only after the contract is concluded, during the early stage of its implementation. At the same time, the MOD has no right to send invitations for attendance at the tender to economic operators that are on the banned list.

87. Each participant must complete the declaration on ethical conduct and lack of involvement in fraudulent practices and corruption. That declaration shall be deposited with all other documents required from the participant for qualifying. At the same time, each participant will present a certificate of confirmation of execution capacity, which reflects the following information: experience, performance, the volume of production, the number of employees and technical equipment. A good reputation can be built by companies through the implementation of contracts within the time specified in the contract. In cases in which operators do not meet the contract requirements, the merchandise will be returned.

88. These activities are strictly regulated by legislation – namely, Chapter V of the Main requirements regarding procurement procedures, the Law of 13.04.2007 on Public Procurement provides procedures for communications and information exchange, which can take place between the contracting authority and the economic operator. Communication, the exchange and storage of information shall be carried out in such a way, so as to ensure the integrity of data and the confidentiality of tenders and requests for participation, as well as the analysis by the contracting authorities which must be available to the public at all times.

CONCLUSIONS

89. The Moldovan MOD is actively engaged in developing a Building Integrity Programme which will assist them to promote good practices aimed at strengthening transparency, accountability and integrity.

90. The NATO BI Team recommends the publication of the BI Peer Review Process on the Ministry of Defence' website. The NATO BI Team also recommends the establishment of a BI Working Group who will be in charge of elaborating the Integrity Plan. This road map will assist the execution of BI recommendations and reforms. The expertise of other BI participating countries in developing an Integrity Plan could be shared to the Moldovan MOD.

93. During the two peer review visits, the interviews conducted by the BI NATO Team were open, frank and wide ranging. The team had full access and availability to the most senior MOD leadership (during the first peer review visit) as well as key personnel in important management positions. Once further reforms take place and new processes are implemented, it will take a period of time to observe the positive changes are regards reducing corruption risk in the most vulnerable areas. The NATO BI Team remains at the disposal of the Ministry to provide further assistance.

NATO Building Integrity First Peer Review Visit (22-24 October 2014)

Team Composition:

1. Ms. Bénédicte BOREL, Team Leader, NATO International Staff, Political Affairs and Security Policy Division
2. BG. Ivan CARUSO, Deputy Director, NATO International Military Staff, Cooperation and Regional Security Division
3. LTC Claude MOERMAN, NATO International Military Staff, Cooperation and Regional Security Division
4. Ms. Tamara KAROSADNIDZE, Deputy Minister, Ministry of Defence of Georgia
5. Ms. Patricia SHEARING, Subject Matter Expert (SME)
6. Mr. Richard WILLIAMS, Subject Matter Expert (SME)

Personnel Interviewed:

1. Mr. Aurel FONDOS, Deputy Minister of Defence of the Republic of Moldova
2. Mr. Vladimir ABABIL, Head of Defence Policy and Planning Directorate;
3. COL Victor PIRTINA, Head of General Inspection Directorate;
4. COL Mihail BUCLIS, Commander (rector) of Military Academy of the Moldovan Armed Forces;

5. LTC Viorel REMESOVSKI, Deputy Head of Law Directorate, Chief of Law Section;
6. LTC Diana GRADINARU, Head of Public Relations Service;
7. LTC Veaceslav DONICA, Chief of Human Resources Planning Section, Human Resources Management Directorate;
8. LTC Gleb COCA, Chief of Political Payroll and Military Retirement Section, Economic Financial Directorate;
9. LCT Vadim MORARU, Chief of Planning Resources Service, J4 Logistics Directorate;
10. LTC Tamara GREC, Senior Staff Officer Military Cooperation Section J5 Strategic Planning Directorate Main Staff of National Army
11. LTC Vasile SEVERIN, Acting Head of J7 Doctrine and Joint Training Directorate;
12. MAJ Ion ROTARU, Senior Inspector of Prevention and Investigation of Corruption and Fraud Section, General Inspection Directorate;
13. MAJ Dumitru ISAC, senior staff officer Planning Resources Service, J4 Logistics Directorate;
14. MAJ Ilie STRISCA, Acting Head of Public Procurement Directorate, Facilities Management Department;
15. MAJ Vitalie ROHAC, Chief of Procurement Department and Technical Material Trading, Public Procurement Directorate, Facilities Management Department.
16. MAJ. Alexei PLESCAN, Deputy Commander of Carabineer Troops, Chief of Logistics Directorate;
17. Border Police – LTC Serghei TODIRAS, Deputy Head of Border Control General Directorate, Chief of Border Surveillance Directorate,
18. Mr. Vitalie VEREBCEANU, General Directorate of Prevention of Corruption, National Anti-Corruption Centre;
19. Mr. Alexandru CIMBRICIUC, deputy president of the Parliamentary Committee on National Security, Defence and Public Order;
20. Mr. Igor FONDOS, Senior Consultant, Parliamentary Committee on National Security, Defence and Public Order;
21. Mr. Iurie PINTEA, specialist, Institute for Public Policy;
22. Mrs. Elena MARZAC, director, Information and Documentation Center on NATO;
23. Mr. Viorel CIBOTARU, director, European Institute for Political Studies in Moldova.

NATO Building Integrity Second Peer Review Visit (22-23 July 2015)

Team Composition:

1. Ms Bénédicte BOREL, Team Leader, NATO International Staff, Political Affairs and Security Policy Division
2. Ms Patricia SHEARING, Subject Matter Expert (SME)

Personnel Interviewed:

1. COL Victor PIRTINA, head of General Inspection Directorate;
2. MAJ Ion ROTARU, head of prevention and investigation of corruption and fraud section, General Inspection Directorate;
3. COL Eduard OHLADCIUC, Director of Facilities Management Department;
4. LTC Veaceslav DONICA, head of management career cell, Human Resources Management Directorate;
5. LTC Andrei PASCAL, head of human resources planning cell, Human Resources Management Directorate;
6. Ms Elena TARALUNGA, consultant, Policy Analysis, Monitoring, and Evaluation Section, Defense Policy and Planning Directorate;
7. LTC Ion VULPE, chief editor at "Oastea Moldovei" Magazine;
8. CPT Maria ARAMA, main specialist, Public Relations Service.