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FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in
central governments (top executive functions) and
law enforcement agencies

COMPLIANCE REPORT

ROMANIA



Adopted by GRECO
at its 100th Plenary meeting (Strasbourg, 3-6 June 2025)



Group of States against Corruption
Groupe d'États contre la corruption

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

I. INTRODUCTION

1. GRECO's Fifth Evaluation Round concerns "Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies".
2. This Compliance Report assesses the measures taken by the authorities of Romania to implement the recommendations made in the Fifth Round Evaluation Report on Romania which was adopted by GRECO at its 94th plenary meeting (5-9 June 2023), and made public on 7 September 2023.
3. As required by GRECO's Rules of Procedure,¹ the authorities of Romania submitted a situation report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 24 December 2024 and served, together with additional information subsequently provided, as the basis for this Compliance Report.
4. GRECO selected the Slovak Republic (in respect of top executive functions in central governments) and Greece (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Radka MONCOLOVÁ, on behalf of Slovak Republic, and Ms Panagiota VATIKALOU on behalf of Greece. They were assisted by GRECO's Secretariat in drawing up this report.
5. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and provides an overall appraisal of Romania's level of compliance with these recommendations. The implementation of any outstanding recommendations (partly or not implemented) will be assessed on the basis of a further situation report to be submitted by the authorities 18 months after the adoption of this report.

II. ANALYSIS

6. GRECO addressed 26 recommendations to Romania in its Evaluation Report. Compliance with these recommendations is dealt with below.

Preventing corruption and promoting integrity in central governments (top executive functions)

Recommendation i

7. *GRECO recommended that rules be introduced requiring that integrity checks take place prior to or right upon the appointment of Members of the Government, Presidential Councillors and Ministerial Advisers in order to identify and manage any possible conflicts of interest.*

¹ The compliance procedure for the Fifth Evaluation Round is governed by GRECO's Rules of Procedure as amended. See Rule 31 revised bis and Rule 32 revised bis.

8. The authorities report that [Law no. 49/2025](#) was promulgated on 14 April 2025², allowing the Prime Minister or the Prime Minister-designate to request any type of information regarding personal interests which could affect the impartial exercise of duties from persons with top executive functions (PTEFs) within the Government, prior to their appointment (see Articles 47⁸ and 47⁹). This requirement is in addition to the existing statutory obligation to submit declarations of assets and interests under [Law no. 176/2010](#) on integrity in the exercise of public functions and dignities³, although the nature of information may not necessarily differ. An implementing by-law (a ministerial order) will be adopted to establish institutional arrangements, responsibilities, and further verification and monitoring mechanisms, in accordance with Article III (3) of Law no. 49/2025.
9. Regarding the Presidential Administration, personnel may be employed on the basis of trust granted by the President of Romania and are subject to the signing of a loyalty commitment established by the Regulation on the Organisation and Functioning of the Presidential Administration.⁴ The Personnel Rules of the Presidential Administration include provisions on the prior vetting of persons proposed for employment within the Presidential Administration. To that end, at the request of the General Secretariat of the Presidential Administration, the Protection and Security Service, pursuant to Article 14, paragraph (1), sub-paragraph (k¹) of [Law no. 191/1998](#) on the Organisation and Functioning of the Protection and Security Service, carries out prior security checks of candidates seeking employment within the Presidential Administration, including Presidential Councillors and state councillors, to approve access to the presidential palace. Presidential Councillors are also obliged to submit a declaration of incompatibility.
10. GRECO takes note of the rules for the prior conduct of security checks for candidates applying for employment within the Presidential Administration. However, based on the information provided, their outcome appears to result in the granting of a security clearance to access the presidential palace, rather than identifying and managing potential conflicts of interest that successful candidates may have prior to taking up office. Furthermore, GRECO welcomes that a new law (i.e. Law no. 49/2025) has introduced ethics and conducts rules for PTEFs within the Government, empowering the Prime Minister or the Prime Minister-designate to request any type of information regarding personal interests which could affect the impartial exercise of PTEF's official duties. GRECO expects that such rules will be systematically implemented through the

² Law no. 49/2025 amends and supplements the Government Emergency Ordinance no. 57/2019 on the Administrative Code and modifies Article 1 para. (1) of Law no. 251/2004 on some measures regarding goods received free of charge during protocol activities carried out while exercising a mandate or public office. The Law introduces a new Chapter IV¹ on rules of ethics and conduct for Government members and other persons holding public dignity positions within the central public administration. Under the newly added Article 47², its provisions apply to members of the Government, the Head of the Prime Minister's Chancellery, the Secretary General and Deputy Secretaries General of the Government, Secretaries and Undersecretaries of State, and state advisers from the Prime Minister's Chancellery, who are considered persons with top executive functions in the Fifth Round Evaluation Report on Romania.

³ According to Law no. 176/2010, persons who fall under its scope are required to submit asset and interest disclosures upon taking office, upon leaving office, and annually by June 15. The National Integrity Agency (ANI) is responsible for verifying these disclosures.

⁴ Law no. 47/1994 on the services subordinated to the President of Romania.

establishment of a verification mechanism that will assess potential conflicts of interest, by checking, for example, liabilities, interests, financial aspects, family ties, ancillary activities or contacts with third parties, while the collection of information regarding personal interests should not be left to the Prime Minister's discretion.⁵ Consequently, it calls on the authorities to proceed with the swift and appropriate implementation of the newly enacted law.

11. GRECO concludes that recommendation i has been partly implemented.

Recommendation ii

12. *GRECO recommended that, for the sake of transparency, the Ministerial Advisers' names, areas of responsibility and information on ancillary activities (when those are carried out) be made public and easily accessible.*
13. The authorities report that the list of the Prime Minister's advisers, including their names, positions and curriculum vitae, has been made public on the Government's website⁶. The Minister of Education and Research has also published a list of ministerial advisers.⁷
14. GRECO notes that public information is provided regarding the Prime Minister's advisers. As required by the recommendation, such information should be extended to other ministerial advisers and complemented with information on ancillary activities, as appropriate. In this regard, the Minister of Education and Research has published a list of ministerial advisers.
15. GRECO concludes that recommendation ii has been partly implemented.

Recommendation iii

16. *GRECO recommended that (i) a systemic analysis of corruption and integrity-related risks covering all persons with top executive functions, including the identification of corresponding remedial measures, be carried out and integrated in the integrity plans which would subsequently be revised or adopted afresh, and (ii) the integrity plans be published online and subject to review, as appropriate.*
17. The authorities report that, in implementation of the National Anti-corruption Strategy 2021-2025 and the [Government Decision no. 599/2018](#) on the standard methodology for the assessment of corruption risks, the General Secretariat of the Government, the Prime Minister's Control Body, and ministries have adopted integrity plans, which are

⁵ Article 47⁹ of Law no. 49/2025 reads as follows: "The Prime Minister or designated Prime Minister may request from the persons they propose or appoint to the positions provided for in Article 47², paragraph (1), prior to the proposal or appointment, information regarding any type of personal interests likely to affect the impartial exercise of the mandate or position".

⁶ <https://gov.ro/ro/prim-ministru/echipa-prim-ministrului>

⁷ https://www.edu.ro/cabinet_ministru

available online.⁸ Integrity plans are updated every two years, based on the results of the corruption risk assessment.

18. Regarding the Presidential Administration, an integrity plan has been adopted in 2023 and published online⁹.
19. GRECO recognises that, regarding the second part of the recommendation concerning the publication of integrity plans, the Presidential Administration adopted and published an integrity plan in 2023, in addition to the 2022 integrity plan described in the Evaluation Report. The Government's General Secretariat and ministries have also followed suit. These developments appear to satisfy its requirement. However, as required by the first part of the recommendation, GRECO has not yet received evidence that the integrity plans include risks and remedial measures covering PTEFs. It therefore considers that this part of the recommendation has not been complied with, even partially.
20. GRECO concludes that recommendation iii has been partly implemented.

Recommendation iv

21. *GRECO recommended that a comprehensive analytical study of the existing legal integrity framework be carried out and, in the light of its findings, the current integrity framework be reviewed in order to enhance its clarity, coherence and comprehensiveness.*
22. The authorities report that the National Integrity Agency (ANI), together with the Ministry of Justice and Transparency International Romania, has carried out a comprehensive analytical study of the existing legal integrity framework¹⁰, focusing on inconsistencies, ambiguities and omissions that weaken the efficiency and effectiveness of the Romanian integrity system, as well as on good practices. The study's findings have been summarised in a public newsletter.¹¹ Consequently, draft legislative proposals to amend the existing integrity framework are under discussion. A working group has been established to propose concrete legislative amendments, with no final position yet taken by the authorities having the right of legislative initiative.

⁸ See, for example, the integrity plans of the following institutions: the General Secretariat of the Government: <https://sgg.gov.ro/1/planul-de-integritate-al-institutiei/>; the Ministry of Internal Affairs: <https://www.mai.gov.ro/wp-content/uploads/2023/01/Planul-de-integritate-pentru-implementarea-Strategiei-nationale-anticoruptie-la-nivelul-MAI.pdf>; the Ministry of Justice: <https://www.just.ro/wp-content/uploads/2023/04/Plan-de-integritate-MJ-1.pdf>; the Ministry of Development, Public Works and Administration: <https://www.mdlnpa.ro/uploads/articole/attachments/65c495c397903601089287.pdf>; the Ministry of Labor, Family, Youth and Social Solidarity: <https://mmuncii.ro/j33/index.php/ro/transparenta/2016-sna>.

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[https://www.presidency.ro/files/documente/Planul de Integritate al Administratiei Prezidentiale, revizuit - 2023.pdf](https://www.presidency.ro/files/documente/Planul_de_Integritate_al_Administratiei_Prezidentiale_revizuit_-_2023.pdf)

¹⁰ <https://www.niaact.ro/>

¹¹ <https://www.titools.ro/sipoca1158/newsletter/03/>

23. GRECO acknowledges the conduct of a comprehensive analytical study of the existing legal integrity framework, which has highlighted the need to consolidate and streamline the integrity legislation. Work is underway to make concrete proposals aimed at enhancing the current integrity framework's clarity, coherence and comprehensiveness. Pending the development of these legislative proposals, this recommendation has not been more than partially implemented.
24. GRECO concludes that recommendation iv has been partly implemented.

Recommendation v

25. *GRECO recommended that (i) codes of conduct for persons with top executive functions, or another appropriate document for the President, be adopted or revised and published online, covering all relevant integrity matters (e.g. conflicts of interest, gifts, contacts with third parties, ancillary activities, confidential information, post-employment restrictions, etc.), accompanied by the provision of clear guidance; and (ii) proper monitoring and enforcement of the codes of conduct be ensured.*
26. The authorities report that Law no. 49/2025, as referred to in paragraph 8 above, has laid down rules of ethics and conduct for PTEFs within the Government. Articles 47³-47¹³ of the Law also regulate the acceptance and receipt of gifts, transparency of interests (including notification of abstention in the decision-making process, declaration of interests and measures prior to the proposal or appointment to the relevant positions), use of public resources, disclosure of interactions with third parties who might seek to influence the decision-making process, training and development programmes, and counselling. Guidelines will be developed following the entry into force of Law no. 49/2025.
27. Regarding the Presidential Administration, a code of conduct for its personnel was approved on 5 November 2024 and has been published online.¹² The principles governing the conduct of personnel are transparency, honesty, integrity, respect for citizens, professionalism, impartiality, independence and accountability. The code prohibits the disclosure and use of classified or confidential information (Article 11), governs the acceptance and receipt of gifts or other advantages (Article 12), regulates the responsible use of public resources (Article 13), introduces certain limitations and restrictions (Articles 15, 17 and 18), and ensures compliance with the legal regime of conflicts of interest and incompatibilities (Article 16). An ethics counsellor and the human resources department draw up an annual progress report on the implementation of the code.¹³ The Human Resources – Payroll Department of the

¹²

https://www.presidency.ro/files/documente/Codul_de_conduita_a_personalului_Administratiei_Prezidentiale.pdf

¹³ See [Report](#) on the implementation of the principles applicable to the professional conduct of public officials and of the norms/standards of conduct of public officials within public authorities and institutions - for the period January 1 - December 31, 2024; [Report](#) on compliance with the norms of conduct by the contractual personnel within the Presidential Administration - for the period January 1 - December 31, 2024; and, [Report](#) on the implementation of the administrative-disciplinary procedures applicable to public officials within the Presidential Administration - for the period January 1 - December 31, 2024.

Presidential Administration monitors the compliance with the rules of the code of conduct (Article 28) by contracted personnel, and a disciplinary commission examines alleged disciplinary offences committed by civil servants.

28. GRECO takes note of the adoption and publication of a code of conduct applicable to presidential counsellors, while also noting that there continues to be no similar document covering the President, who remains subject to relevant provisions of the Constitution and other applicable laws.¹⁴ GRECO encourages the Presidential Administration to ensure the code's effective application, to publish annual progress reports, and to issue accompanying guidance, the implementation of which will be assessed in the next compliance report. In addition, GRECO notes that the newly promulgated Law no. 49/2025, which will be supplemented by guidelines, training and counselling, intends to complete the rules of conduct for PTEFs within the Government.
29. GRECO concludes that recommendation v has been partly implemented.

Recommendation vi

30. *GRECO recommended that (i) dedicated and robust briefings and/or practical training on integrity standards systematically take place for persons with top executive functions upon taking office and on a regular basis thereafter; and (ii) effective and consistent confidential counselling on all relevant integrity standards be provided to and documented for persons with top executive functions.*
31. The authorities report that, regarding the first part of the recommendation, several measures are under preparation targeting PTEFs within the Government, as follows: (i) Law no. 49/2025, as referred to in paragraph 8 above, regulates their participation in specialised training and professional development programmes on integrity-related matters, both at the time of their appointment and during the exercise of their functions. Its Article 47¹³ states that the ethics advisor appointed within public institutions provides guidance and counselling; (ii) the National Integrity Agency (ANI) is pilot testing an AI-driven online platform¹⁵ to provide real-time clarifications on possible situations of incompatibility or conflict of interest; (iii) an induction package is being prepared for members of the Government, parliamentarians and persons employed in their cabinets.
32. Regarding the Presidential Administration, a training programme has been established for new employees and presidential counsellors. Training sessions are held periodically and cover topics such as the prevention of conflicts of interest, disclosure requirements, the acceptance of gifts and compliance with standards of professional conduct. Additionally, pursuant to Law no. 176/2010 (see paragraph 8 above), two persons have been appointed to provide advice on the submission of asset declarations, conflicts of interest and incompatibilities to interested staff. Furthermore, an ethics adviser has

¹⁴ Law no. 251/2004 on some measures relating to goods received free of charge on the occasion of protocol actions in the exercise of the mandate or function and Law no. 176/2010 (see paragraph 8 above) apply to the President.

¹⁵ *Solicit.ani*

taken up office, in accordance with [Government Emergency Ordinance no. 57/2019](#) on the Administrative Code. The ethics adviser is responsible for, amongst others, monitoring the application and compliance with conduct principles, providing counselling, preparing risk assessment and mitigating measures, and handling complaints filed by members of the public. In 2024, no requests for counselling were received, although the ethics adviser reportedly conducted six briefings.¹⁶

33. GRECO notes that, regarding PTEFs within the Government, several promising measures are being developed to address both parts of the recommendation, the implementation of which will allow for a more complete assessment in the next compliance report. Pending the roll-out and practical implementation of these measures, GRECO considers that neither part of the recommendation has been complied with, even partially.
34. Regarding the Presidential Administration, a training programme appears to be in place, and briefings have reportedly taken place. However, GRECO has not received any evidence confirming the attendance of PTEFs at these sessions, which does not allow it to conclude that the first part of the recommendation has been fully implemented. As for the second part, an ethics adviser and two dedicated staff members have been appointed to provide advice and counselling, thereby partially addressing it. Nevertheless, at this stage, GRECO is unable to assess the consistency and coordination of advice provided, nor the documentation thereof.
35. GRECO concludes that recommendation vi has been partly implemented.

Recommendation vii

36. *GRECO recommended that (i) an independent oversight mechanism be established to examine complaints against the authorities' refusal to disclose public interest information and to guarantee the effective implementation of the freedom of information legislation, and (ii) as required by the domestic legal framework, the information of public interest be regularly disclosed and updated by the central government authorities on the relevant websites in order to facilitate the public's access to information and its role to scrutinise their activities.*
37. The authorities reiterate that, regarding the first part of the recommendation, the access-to-information law provides for the possibility for individuals to institute judicial proceedings against the authorities' refusal to disclose public interest information. As for the second part of the recommendation, the General Secretariat of the Government monitored the degree of compliance with the proactive transparency requirements under the access-to-information law by public authorities and revealed a compliance rate of 75.16 % for the ministries and the General Secretariat of the Government.¹⁷

¹⁶

<https://www.presidency.ro/files/userfiles/2024%20-%20Raportare%20anuala%20privind%20implementarea%20principiilor%20aplicabile%20conduitei%20profesionale%20a%20functionarilor%20publici%20si%20a%20normelor%20standardelor%20de%20conduita.pdf>

¹⁷ <https://sgg.gov.ro/1/transparenta-decizionala-monitorizare/>

38. GRECO considers that, regarding the first part of the recommendation, the situation remains as described in the Evaluation Report. GRECO encourages the authorities to consider the advantages of establishing an independent oversight mechanism to supervise the implementation of the access-to-information legislation. GRECO takes note of the findings made towards the implementation of the second part of the recommendation. While they indicate progress in the right direction, GRECO is of the view that the situation should be kept under review and that further progress, preferably evidenced by a higher compliance rate with the proactive transparency legal requirements, should be assessed in the next compliance report.
39. GRECO concludes that recommendation vii has been partly implemented.

Recommendation viii

40. *GRECO recommended that, as a matter of priority, (i) a study be conducted to assess the practice of legislating through emergency ordinances, the existence of adequate and effective safeguards and controls, and that, in the light of its content and findings which should be made public, the regulatory framework and practice be revised accordingly; and (ii) an adequate level of public consultations on draft emergency ordinances be effectively ensured and that only specific and limited exceptions to this rule be made possible and be clearly regulated.*
41. The authorities report that, as regards the second part of the recommendation, citizens are involved in the drafting of normative acts, including Government Emergency Ordinances, from the start of the process, as required by law.¹⁸ The law excludes certain areas from public consultation procedures, such as national defence, national security, and the situations requiring an immediate solution. The General Secretariat of the Government has further developed the “E-Consultare platform” to ensure that a unique record of the decision-making transparency process is kept. The platform facilitates, in an interactive manner, the submission of proposals directly to the initiating institutions and, at the same time, in situations where the responsible institution decides to hold a public debate during the consultation period, this will be displayed next to the draft normative act, specifying the date, time, location and subject of the debate. Users can participate in the public consultation by submitting recommendations and can subscribe to the weekly newsletter containing the list of the latest draft open for public consultation. In addition to the existing platform, some institutions offer electronic forms for the submission of proposals to improve legislation under public consultation.
42. Furthermore, the authorities refer to the publication of the 2023 annual report on the review of regulatory impact assessments.¹⁹ The section concerning stakeholder participation notes that a review of 226 presentation and reasoning instruments (*Instrument de prezentare și motivare* - IPMs) revealed a generally low quality of information regarding public consultation: almost 47% of IPMs were deemed unsatisfactory, while 38% were assessed as partially satisfactory. The highest number of

¹⁸ Law no. 52/2003 on decision-making transparency in public administration, as subsequently amended and supplemented, and Governmental Decision no. 831 of 27 June 2022.

¹⁹ <https://sgg.gov.ro/1/rapoarte-anuale-privind-evaluarea-impactului-reglementarilor/>

unsatisfactory and partially satisfactory IPMs, in terms of the consultation process, was observed for Government Decisions and Government Emergency Ordinances.

43. GRECO takes note of the legal framework regulating public consultations for legislation, including Government emergency ordinances (GEOs). However, the information provided, particularly the 2023 annual report on the review of regulatory impact assessments, confirms that GEOs were not subject to an adequate level of public consultations. GRECO considers that none of the parts of the recommendation has been complied with, even partially.
44. GRECO concludes that recommendation viii has not been implemented.

Recommendation ix

45. *GRECO recommended that the transparency of draft legislation originating from the Government be further enhanced by (i) taking measures to ensure an effective and broad level of public consultations in respect of the Government's draft normative acts; (ii) increasing the minimum statutory timeline for public consultations to an adequate level in order to allow for effective and meaningful consultations; and (iii) publicly providing the legislative footprint documenting and disclosing substantive external inputs (containing contributions received, parties involved and justification for their acceptance or rejection) from the beginning of the legislative drafting process.*
46. The authorities refer to the Law on the Transparency of Decision-making (see paragraph 41 above), a detailed description of which is provided in paragraphs 74-77 of the Evaluation Report. Training sessions have been organised for public servants and civil society representatives on applying and using the relevant legal framework. Future training sessions are planned for 2025 and have been included in the Open Government Strategy of Romania. As a result of monitoring of the implementation of this framework²⁰, recommendations have been issued to the public administration. They include: publishing draft legislation at the preliminary stage, with clearly defined objectives and impact; promoting draft legislation through diverse channels, such as social media and dedicated newsletters; holding consultative workshops with civil society organisations; regularly reviewing and supplementing published information, with periodic checks on data completeness and accuracy; implementing measures to involve under-represented groups; adopting participatory practices, such as participatory budgeting, citizens' juries, hackathons; and analysing the use of resources, with reallocation where needed to enhance transparency. The authorities also refer to the developments made to the "E-Consultare platform" and other consultation channels, as set out in the above-mentioned paragraph.
47. Regarding the third part of the recommendation, the website of the General Secretariat of the Government²¹ publishes announcements for public consultations, the draft acts subject to consultation and other relevant supporting documents, the deadline for submitting proposals and opinions, and the e-mail address to send comments. The

²⁰ <https://sgg.gov.ro/1/transparenta-decizionala-monitorizare/>

²¹ <https://sgg.gov.ro/1/anunturi-proiecte-de-acte-normative/>

comments received are published together with their status (accepted or rejected) and, where appropriate, the reasons for their rejection. The SGG also publishes the minutes of the public debates organised.

48. GRECO notes that, regarding the first part of the recommendation, recommendations have been issued to the public administration to ensure an effective and broad level of public consultations. GRECO expects that these recommendations will be translated into the adoption of concrete measures that fully satisfy its requirements, particularly in light of the findings of the 2023 annual report on the review of regulatory impact assessments, which revealed an overall inadequate level of public consultations (see paragraph 42 above). With respect to the second part, the information provided does not demonstrate any concrete progress towards implementation. As for the third part, GRECO takes note of the existence of a website providing explanatory notes and draft legislation, which supports considering this part to be partly implemented. Contrary to the authorities' assertion, information on the subsequent fate of public comments and the revised draft legislation is missing.
49. GRECO concludes that recommendation ix has been partly implemented.

Recommendation x

50. *GRECO recommended that (i) detailed rules and guidance be introduced on how persons with top executive functions engage in contacts with lobbyists and other third parties seeking to influence their decision-making process and work; and (ii) sufficient information about the purpose of these contacts must be disclosed on a regular basis, such as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion.*
51. The authorities report that Article 47¹¹ of Law no. 49/2025, as referred to in paragraph 8 above, requires PTEFs within the Government to disclose meetings with third parties who seek to influence the decision-making process (including names of the individuals and/or entities concerned, date and place of the meeting, purpose of the meeting) in the Single Register of Transparency of Interests (RUTI), at least two days prior to the meetings. Within five working days from the meetings, the main discussion topics and their conclusions must also be made public in RUTI. The Law also provides for exceptions to the mandatory disclosure²².
52. The Internal Regulations²³ of the Presidential Administration require staff to observe principles of impartiality, non-discrimination, moral integrity and equal treatment when interacting with third parties. They also prohibit the disclosure of confidential information, the provision of assistance and consultancy or the representation of third parties. The code of conduct for the personnel of the Presidential Administration, as

²² Exceptions include the protection of private life, administrative or judicial proceeding, foreign policy interests, regulations on working conditions and employment undertaken by representatives of trade unions, information covered by the access-to-information legislation and information concerning the right of a natural person to benefit from public services.

²³ https://www.presidency.ro/files/documente/Regulamantul_Intern_Administratia_Prezidentiala.pdf

referred to in paragraph 27 above, further requires the staff holding managerial positions to comply with the established legal regulations regarding communication with third parties that could influence the decision-making process and the activity carried out at the institution level.

53. GRECO welcomes the entry into force of Law. No. 49/2025, which, as formulated, appears to address both parts of the recommendation in relation to PTEFs within the Government. It looks forward to the Law's implementation in practice, particularly with regard to the second part of the recommendation concerning the regular disclosure of meetings that PTEFs have with lobbyists and other third parties. GRECO acknowledges that the Presidential Councillors are bound by the principles of ethics and good conduct when engaging with third parties, which appears to satisfy the first part of the recommendation. However, it notes the absence of similar statutory provisions applicable to the President. No information has been provided on the progress made by the Presidential Administration in implementing the second part. Pending further developments, GRECO considers this recommendation to be partly complied with.
54. GRECO concludes that recommendation x has been partly implemented.

Recommendation xi

55. *GRECO recommended that, in the case of ad hoc conflict of interest between private interests and official functions, a requirement to disclose, abstain or withdraw be introduced in respect of persons with top executive functions, including with regards to the issuance, approval or adoption of normative acts.*
56. The authorities report that Article 47⁷ of Law no. 49/2025, as referred to in paragraph 8 above, requires PTEFs, with the exception of the Prime Minister, to abstain from participating in the decision-making process regarding a normative act or a public policy document if a conflict may arise between certain private interests of PTEFs and the matter under discussion in the framework of government procedures or other activities related to their official functions. The authorities add that, in situations involving a conflict of interest, other provisions of Law no. 161/2003 on certain measures to ensure transparency in the exercise of political officeholders may apply, acknowledging, at the same time, that no practical mechanism exists for the Prime Minister to abstain from his/her duties in such cases. The list of abstention notifications will be published on the website of the central public administration institution or authority, or on the Government's website. Notifications are to be submitted to the Prime Minister, the Minister, or the hierarchical superior, as appropriate.
57. The Presidential Administration intends to address this recommendation in the future.
58. GRECO welcomes that Law no. 49/2025 has introduced a requirement for PTEFs within the Government, except for the Prime Minister, to disclose *ad hoc* conflicts of interest and abstain from the subsequent decision-making process on normative acts. That said, GRECO considers that the management of *ad hoc* conflicts of interest involving the Prime Minister, the President and Presidential Councillors is necessary to ensure full

compliance with the requirements of this recommendation. As described in paragraphs 92-96 of the Evaluation Report, the applicable legislation does not provide for the disclosure of *ad hoc* conflicts of interest in relation to the decision-making process for normative acts by these PTEFs.

59. GRECO concludes that recommendation xi has been partly implemented.

Recommendation xii

60. *GRECO recommended that (i) the rules on gifts and all forms of benefits/advantages applicable to persons with top executive functions be more specific and be accompanied by appropriate guidance, and (ii) central government institutions disclose the list of all protocol gifts received, in a regular and timely manner, in accordance with the statutory requirements.*
61. The authorities report that Articles 47⁴-47⁶ of Law no. 49/2025, as referred to in paragraph 8 above, regulates the regime of gifts, benefits and services offered to PTEFs, except for the Presidential Administration. While it prohibits the receipt of gifts under specific circumstances, the Law allows individuals to keep a gift with a value of up to 100 euros, and up to 300 euros annually if multiple gifts are received from the same person. PTEFs must report all gifts to a three-member commission set up at within each central public administration body, which is responsible for assessing their value. Central public administration bodies must publish each semester a list of received gifts. If the value of a gift has been determined to exceed 100 euros, the recipient may keep it and pay for the excess over 100 euros. If the value of gifts received from the same person exceeds 300 euros, the gifts become the property of the central public administration body.
62. Furthermore, according to the Presidential Administration's Code of Conduct, staff members are prohibited from requesting or accepting, directly or indirectly, for themselves or for others, any gifts or other advantages in connection with their positions, except for gifts received within the framework of protocol activities. A commission for the evaluation and inventory of protocol gifts has been established.²⁴ The list of gifts received free of charge during protocol activities is published annually on the website of the Presidential Administration.²⁵
63. GRECO welcomes that, regarding the first part of the recommendation, Law no. 49/2025, which applies to PTEFs other than the President and Presidential Councillors, lays down specific rules as regards the receipt of gifts, their permissible value and assessment, as well as a list of prohibited gifts. GRECO would welcome the issuance of appropriate guidance, as required by the recommendation, to support its implementation. However, GRECO considers that the same legal framework described

²⁴ Decision no. 1/2023 of the President of Romania, based on the Norms regarding goods received free of charge within the framework of protocol activities of the Presidential Administration and in accordance with the Regulation concerning the implementation of Law no. 251/2004 on certain measures regarding goods received free of charge on the occasion of protocol actions in the exercise of the mandate or function.

²⁵ <https://www.presidency.ro/ro/administratia-prezidentiala/transparenta-institutionala?categ=40>

in the Evaluation Report continues to apply to the President and Presidential Councillors. For these reasons, the first part of the recommendation has been partly implemented. Regarding the second part of the recommendation, GRECO commends the Presidential Administration for continuing to publish the list of received gifts and encourages the Prime Minister's Chancellery and ministries to adopt the same practice, as provided for in Law no. 49/2025 and required by this part of the recommendation. For this reason, it has been partly implemented.

64. GRECO concludes that recommendation xii has been partly implemented.

Recommendation xiii

65. *GRECO recommended that (i) rules on post-employment restrictions be developed and applied to persons with top executive functions, and (ii) an effective monitoring mechanism regarding these rules be established.*
66. The authorities report that the Presidential Administration has developed and approved a system procedure for the prevention of revolving-doors situations, which also applies to Presidential Councillors. According to this procedure, depending on the nature of employment relationship, staff of the Presidential Administration are subject to cooling-off periods ranging from one to three years before they may work or provide consultancy services for entities which they previously supervised or were involved in a decision-making capacity. The Human Resources-Payroll Department informs identified employees of their obligations and consequences of non-compliance with post-employment restrictions. A declaration is completed by a departing employee, attesting the absence of a revolving-door situation, which is then recorded in a register used for monitoring such situations and added to the employee's personnel file. In addition, Article 25 of the Presidential Administration's Code of Conduct requires departing staff members to respect post-employment prohibitions applicable to public institutions.
67. Regarding the remaining PTEFs, the Prime Minister has ordered the establishment of a sub-committee which, among other thing, will review the legislation concerning post-employment restrictions applicable to them.
68. GRECO notes that a procedure on post-employment restrictions has been developed and approved for Presidential Councillors, meeting the first part of the recommendation for this category of PTEFs. Work has begun to develop rules on post-employment restrictions for the remaining PTEFs. However, the second part of the recommendation, concerning the establishment of an effective monitoring mechanism, remains not implemented pending further developments.
69. GRECO concludes that recommendation xiii has been partly implemented.

Recommendation xiv

70. *GRECO recommended that (i) declarations of assets and interests of persons with top executive functions be effectively and substantively checked on a regular basis by the*

National Integrity Agency, and (ii) the National Integrity Agency be provided with increased resources and means, as well as robust and effective cooperation/interaction with other relevant control bodies/databases, that are proportionate to the proper and effective performance of its duties.

71. The authorities report that, regarding the first part of the recommendation, ANI designed a platform in 2024 to check all disclosures of assets and interests and identify the most problematic ones that may identify an integrity incident, such as conflict of interest, incompatibility, unjustified wealth, and incorrect completion. The platform is intended for internal use by integrity inspectors. It is currently connected to e-Dai, the online platform for submitting declarations of assets and interests, with plans to link it to other existing databases based on evidence and identified needs. The platform enables effective and regular substantial checks of all disclosures, including those of PTEFs, using six categories of specific risks factors. It produces alerts related to potential false data, potential illegal tenure of public office, potential breach of incompatibility and conflict-of-interest rules, as well as potential breach of the submission deadlines. Potential risks of biased decision-making and potential false data or unjustified wealth are currently being tested.
72. To date, the platform has flagged more than 1,000 cases of persons (not only PTEFs) at risk of breaching the legal framework, leading to over 5,000 asset and interest disclosures being subject to further checks and analysis by ANI's integrity inspectors. As a result, three cases of incompatibility were identified, and 140 declarations are undergoing in-depth review. The platform has also identified 656 cases of persons at risk of breaching the legal incompatibility framework, in respect of whom over 3,936 asset and interest disclosures were subject to further checks. Following the initial review, ANI's integrity inspectors are currently processing 140 disclosures submitted over the past three years concerning 24 persons.
73. Regarding the second part of the recommendation, in 2024 ANI, in collaboration with the National Institute of Magistracy, organised a forum that gathered judges and prosecutors within the Wealth Investigation Commissions attached to each Court of Appeal, as well as the integrity inspectors and legal advisors of ANI. The event facilitated the exchange of expertise and best practices between the institutions.
74. GRECO acknowledges the establishment of a new platform, which, based on the information received, appears capable of producing alerts of integrity incidents related to all declarations of assets and interests. However, given its recent launch and current stage of development, GRECO considers that the consolidation of the platform's performance and its effectiveness should be reviewed in the next compliance report before concluding that the first part of the recommendation has been fully implemented. As for the second part of the recommendation, the organisation of a single joint activity between ANI and the Wealth Investigation Commissions is insufficient to consider it fully implemented. No information has been provided on strengthened cooperation with all relevant bodies, nor on whether ANI's resources have increased to carry out the tasks entrusted to it competently and effectively.
75. GRECO concludes that recommendation xiv has been partly implemented.

Recommendation xv

76. *GRECO recommended that necessary ongoing measures be taken in order to reach a sufficient and stable workforce to address the current challenges faced by the National Anti-corruption Directorate.*
77. The authorities report that through the new justice laws²⁶, which came into force in December 2022, the 10-year seniority requirement for appointment as a prosecutor at the National Anti-Corruption Directorate (DNA) has remained unchanged, but the period during which prosecutors served as auditors of justice is now considered in meeting this requirement. Prosecutors are appointed by the DNA Chief Prosecutor, upon obtaining the opinion of the Section for Prosecutors of the Superior Council of Magistracy and following a competition consisting of an interview organised by the DNA. Between 2022 and 2024, five recruitment competitions were organised at the end of which 80 prosecutors were appointed, compensating for the vacancies arising from transfers to other prosecution offices or retirements. Of the 195 positions allocated for prosecutors at the DNA, 172 have been filled (159 are working at the DNA, and 13 have been delegated to support the European Public Prosecutor's Office). This corresponds to an occupancy rate of 88,20 %, which increases slightly to 88.26 % when auxiliary staff and other categories of employees are included. The authorities indicate that the current staffing situation is sufficient to achieve the DNA's institutional objectives, given that prosecution activity is well supported by both the operative and support structures.
78. GRECO acknowledges the authorities' efforts to strengthen the capacity of the National Anti-corruption Directorate (DNA), which has seen the departure of prosecutors to other prosecution offices or through retirement. Compared to the situation described in the Evaluation Report, the DNA's workforce has increased (from 165 to 172 prosecutors) following a series of recruitment competitions. GRECO expects the authorities to keep the situation under review to ensure continued sustainability of the DNA's workforce.
79. GRECO concludes that recommendation xv has been dealt with in a satisfactory manner.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xvi

80. *GRECO recommended that measures be taken to increase the representation of women at all levels of the Police and the Gendarmerie as part of initial recruitment and promotion policies.*
81. The authorities report that the Ministry of Internal Affairs (MIA), which includes both the Police and the Gendarmerie, promotes and supports the balanced participation of women and men in both operational and management positions, and ensures equal access to career development regardless of gender. Pursuant to [Law no. 202/2002](#) on

²⁶ Law no. 303/2022 concerning the statute of judges and prosecutors, Law no. 304/2022 concerning the judicial organisation and Law no. 305/2022 concerning the Superior Council of Magistracy.

equal opportunities between men and women, as amended, a dedicated person responsible for ensuring equal opportunities and treatment between women and men ought to be appointed in each subordinated structure of the Ministry of Internal Affairs with more than 50, including the Police and the Gendarmerie.

82. Additionally, a draft action plan on the implementation of the principles of equal opportunities and treatment between women and men in the Ministry of Internal Affairs was drafted in 2024 by the General Directorate of Human Resources Management. This action plan, which has been approved by the National Agency for Equal Opportunities between Women and Men, establishes the following main areas of intervention: labour relations, promotion and professional training, work-life balance, and the prevention and combating of gender-based harassment in the workplace. Measures include promoting and supporting the balanced participation of women and men in leadership and decision-making through institutional policies and ensuring gender balance in councils, expert groups and other lucrative managerial and/or consulting structures. Additional measures address gender-based harassment in the workplace.
83. GRECO notes that a dedicated person appears to have been appointed within both the Police and the Gendarmerie to promote equal opportunities and treatment between women and men. It also takes note of the measures proposed in the draft action plan developed by the Ministry of Internal Affairs to implement these principles and looks forward to their full implementation, along with that of any future measures.
84. GRECO concludes that recommendation xvi has been partly implemented.

Recommendation xvii

85. *GRECO recommended that all donations and sponsorships received by the Gendarmerie be systematically published on a centralised, dedicated, accessible webpage, clearly indicating the nature and value of each donation, the donor's identity and how the assets donated were spent or used.*
86. The authorities report that the Gendarmerie has created a dedicated webpage on its website, containing information on "Offers, donations, gifts, manuals, loans and sponsorships", with links to donations and sponsorship for each constituent structure.²⁷
87. GRECO welcomes the creation of a dedicated webpage by the Gendarmerie, which displays information on donations and sponsorships received by its constituent structures.
88. GRECO concludes that recommendation xvii has been implemented satisfactorily.

Recommendation xviii

89. *GRECO recommended that (i) the Code of Ethics applicable to the Police and the Gendarmerie be revised, with the active participation of relevant stakeholders in the*

²⁷ www.jandarmeriaromana.ro/greco-oferte-donatii-daruri-manuale-comodate-si-sponsorizari

Police and the Gendarmerie, to cover in detail relevant integrity issues (such as conflicts of interest, incompatibilities, gifts, contacts with third parties, outside activities, etc.), and (ii) the Code of Ethics be complemented with practical guidance and examples for the staff of the Police and the Gendarmerie.

90. The authorities report that a working group has been set up within the Ministry of Internal Affairs with a view to drafting an integrated Code of Ethics, which is at an advanced stage. The new code will apply to both the police and military personnel and will include principles and standards of conduct that govern the Ministry of Internal Affairs' ethical framework. These include legality, impartiality, professional trust and prestige (including contacts with third parties), probity (including conflicts of interest, incompatibility, gifts), willingness, priority of the public interest, professional discretion (including the non-disclosure of confidential information), respect, hierarchical organisation, accountability (including respect for confidentiality). It will also provide for a mechanism of confidential counselling, a monitoring and enforcement mechanism, and grounds for triggering the initiation of appropriate integrity checks. A guide on the application of the draft code will be developed, containing examples of good practices, and published on the institution's website.
91. GRECO acknowledges that the draft code of ethics responds to the requirements of the first part of the recommendation. It encourages the authorities to proceed with its swift adoption and the production of practical and explanatory guidance, as required by both parts of the recommendation.
92. In these circumstances, GRECO concludes that recommendation xviii has been partly implemented.

Recommendation xix

93. *GRECO recommended that (i) in view of the to-be revised Code of Ethics, initial and in-service training on relevant integrity matters be updated and provided to all law enforcement officers; and (ii) a mechanism of confidential counselling on ethics and integrity matters be established in the Police and the Gendarmerie.*
94. The authorities report that the draft Code of Ethics will provide for a confidential counselling mechanism (see also paragraph 90 above). Additionally, the Directorate General for Anti-Corruption, in cooperation with international partners, has implemented a project on improving training techniques for trainers in ethics and integrity.²⁸ The resulting training curriculum is available online and is to be considered best practice in the field of integrity.²⁹ It consists of eight modules, covering topics such as anti-corruption laws, managing integrity risks, ethical decision-making, conflict of interest management, whistleblower protection, and promoting ethical attitudes. They are used for initial training, dedicated anti-corruption courses for public officials, civil society and anti-corruption trainers with a view to supporting training activities in

²⁸ The project, titled "European Partnership for Ethics and Integrity", was funded by the Erasmus + Program. Its brief overview is accessible at <https://www.mai-dga.ro/eng/archives/12160>

²⁹ <https://erasmus-plus.ec.europa.eu/projects/search/details/2021-1-RO01-KA220-VET-000030177>

academic settings continuous development. A total of 74 activities were carried out, 69 of which targeted the MAI personnel, reaching 1,194 recipients, including 1,033 from the MAI. These training materials and related documentation will be updated following the adoption of the integrated Code of Ethics.

95. GRECO notes that, despite the absence of a revised code of ethics, the authorities have developed what appears to be a comprehensive training curriculum in the field of integrity, which is accessible to public officials, integrity advisers, civil society and anti-corruption trainers. For this reason alone, the first part of the recommendation is considered partly implemented. GRECO expects that regular training sessions for law enforcement officers will continue to be organised as soon as the code of ethics is adopted. Work is also underway to establish a mechanism of confidential counselling (also see paragraph 90 above).
96. GRECO concludes that recommendation xix has been partly implemented

Recommendation xx

97. *GRECO recommended that integrity checks take place before recruitment and at regular intervals during the career of law enforcement officers, depending on their exposure to corruption risks and the required security levels and upon resuming their functions in the structures of the Police or the Gendarmerie.*
98. The authorities report that, further to Order no. 200 of 13 November 2024 on access to some services in the field of human resources management within the Ministry of Internal Affairs (MAI), the General Directorate of Internal Protection (DGPI) carries out, at least 30 days before registration or recruitment, specialised checks on candidates declared admitted to the Police and the Gendarmerie, in order to verify whether they meet the requirements of accepted conduct and integrity.³⁰ The procedure, established by a classified internal act, includes checks and verifications of integrity, integration into the community, aspects related to discipline, extra-professional / extracurricular activities, including concerns related to excessive alcohol consumption and the use of drugs or other prohibited substances, social environment, including the circle of friends and acquaintances, lifestyle, and reactions to stress and crisis situations. Databases are also searched, and institutional partners consulted. The results of these checks are provided within a maximum of 30 days from the date of receipt of the request.
99. There is currently no legal framework providing for regular integrity checks during the career of the MAI personnel, based on their exposure to corruption risks, security clearance levels, or following their return to office. If, during the career of an officer, the DGPI identifies integrity risks amounting to a criminal offence, it can refer the case to the relevant authorities. It may also conduct polygraph tests, though these are not standardised across the MAI. Article 12 of the draft Code of Ethics authorises appropriate checks where irregularities may affect

³⁰ Order no. 200 of 13 November 2024 for the approval of the procedural aspects regarding the access to some services in the field of human resources management within the Ministry of Internal Affairs through the "Service Hub platform at the level of the Ministry of Internal Affairs", as well as for the modification and completion of some normative acts in the field of human resources management within the Ministry of Internal Affairs.

an officer's performance. To address current gaps, two proposals are under discussion and evaluation. The first concerns the conduct of integrity checks for middle and senior managers every four years based on specific criteria. A committee would be set up, which would assess vulnerabilities and recommend mitigating factors. The second proposal involves identifying sensitive functions based on a corruption risk analysis. Integrity checks would then be conducted according to the sensitivity or classification of the post. Officers would be informed of the results and allowed to address any identified vulnerabilities. If concerns about integrity persist, professional integrity testing may be carried out. An audit of internal management control may take place in case where mitigation fails.

100. GRECO notes the integrity checks carried out during the recruitment process for the Ministry of Internal Affairs, which includes the Police and the Gendarmerie, and views them as consistent with the indications set out in the Evaluation Report. It also notes that the authorities are considering two notable proposals for conducting regular integrity checks during the career of law enforcement officers. GRECO sees these as steps in the right direction and encourages the authorities to adopt the proposal which best reflects the specific local context and realities of the Police and Gendarmerie, and that effectively addresses their exposure to corruption risks.

101. GRECO concludes that recommendation xx has been partly implemented.

Recommendation xxi

102. *GRECO recommended that, as a matter of priority, measures be taken to ensure that appointments to managerial positions, including through empowerment, are strictly based on merit and guided by open, standardised and transparent competitions.*

103. The authorities indicate that, for both the Police³¹ and the Gendarmerie³², new rules have been introduced to provide additional guarantees regarding the conditions in which a police officer exercises a management function by empowerment. A person may now be empowered to occupy a management position if s/he meets the requirements specified in the job description. In 2024, 33% of management positions were filled through empowerment, compared to 34% in 2023. New grounds for terminating the empowerment have been established, i.e. if the police officer is declared "incapable" after the psychological evaluation conducted during the competition for filling a vacant management position, or if the police officer has not passed the competition for the position whose duties are being exercised by empowerment.

104. Within the Ministry of Internal Affairs, steps have been taken to accelerate the processes of administrative simplification and digital transformation of public services and internal

³¹ Government's Emergency Ordinance no. 82/2024 (28 June 2024), amending and supplementing Law no. 360/2002 regarding the Statute of the policeman.

³² Order no. 200/2024 for the approval of the procedural aspects regarding the access to some services in the field of human resources management within the Ministry of Internal Affairs through the "Service Hub platform at the level of the Ministry of Internal Affairs", as well as for the modification and completion of some normative acts in the field of human resources management within the Ministry of Internal Affairs.

working procedures. Specific measures have also been taken to promote the digitisation of recruitment and selection processes open to public. An essential pillar of these initiatives is the Services HUB, which aims to simplify access to the MAI's services for everyone. Since 16 October 2023, all announcements regarding the competitions organised by the MAI have been posted through the public services HUB portal: <https://hub.mai.gov.ro>. From 2023 to date, approximately 4,000 competitions have been organised for management positions.

105. GRECO notes the launch of the recruitment portal for positions within the Ministry of Internal Affairs, which includes the Police and the Gendarmerie, for the organisation of all competitions, including those for management positions. This development responds to the requirement for open, standardised and transparent recruitment procedures. However, in spite of the requirement that candidates meet all conditions outlined in the job specifications, the proportion of management positions filled through empowerment remains high (34% in 2023 and 33% in 2024). This demonstrates the need for continued additional measures to strengthen merit-based and transparent promotion procedures and to fully implement this recommendation.
106. GRECO concludes that recommendation xxi has been partly implemented.

Recommendation xxii

107. *GRECO recommended that an institutional system of rotation be put in place in the Police and the Gendarmerie, which could be applied, as appropriate, in areas considered particularly exposed to corruption risks.*
108. The authorities indicate that, in the Gendarmerie, there is a natural rotation system for executing public order missions, which are punctual (not permanent) activities, exercised for a defined period in specific locations. In addition, certain units carry out missions throughout the entire national territory, such as the Special Intervention Brigade of the Gendarmerie and mobile gendarmerie groups. In missions executed in cooperation with other institutions, there is a rotation of the personnel who carry out the activity due to the workforce planning needs and the unpredictability of operational actions. Furthermore, the Gendarmerie may carry out activities to maintain public order under the direction of the Police. This involves the rotation of the personnel in different areas depending on the operational context and territorial responsibilities. As regards institutional security and protection duties, the Gendarmerie follows a guarding plan, which involves a dynamic rotation of personnel.
109. As for the Police, ways have been identified to prevent police officers from being assigned permanently to the same patrol areas during public order and public safety activities in both urban and rural environments.³³ The existing framework requires that the composition of patrols, patrol areas and itineraries not be made permanent, while also ensuring a balanced professional experience, an ongoing rotation of the personnel forming patrols units and continuous variation of their composition. Patrol areas

³³ Article 34 of the Concept on the Management of Public Order Structures, approved by IGPR Provision no. 14 of 27.02.2023.

assigned to patrol units and patrol routes are determined based on the concept of intelligence-led policing, which means that the patrol routes are drawn up using tactical analysis and assessment of the operational situation recorded in the previous 24 hours or recent days.

110. GRECO notes the information provided by the authorities. There appears to be a system of rotation of law enforcement officers within both the Police and the Gendarmerie with respect to the conduct of activities, the composition of patrol units and the patrol routes. For the recommendation to be considered fully implemented, GRECO encourages the authorities to expressly base this system of rotation on areas identified as particularly exposed to corruption risks, as described in the integrity plan and required by the recommendation.
111. GRECO concludes that recommendation xxii has been partly implemented.

Recommendation xxiii

112. *GRECO recommended laying down rules and procedure regulating the disclosure and management of conflicts of interest in the Gendarmerie.*
113. The authorities indicate that the Gendarmerie is subject to existing legislation governing conflicts of interest. In 2019, the Human Resources Department developed a procedure for managing declarations of assets and interest, which has been published on the intranet.
114. GRECO takes note of the information provided. While the 2023 Evaluation Report acknowledged the legislation then applicable to the Gendarmerie, such as Law no. 161/2003, Law no. 176/2010 and the Criminal Code, it also concluded that conflicts of interests were not specifically regulated. In the absence of any concrete progress to address this issue, GRECO concludes that recommendation xxiii has not been implemented.

Recommendation xxiv

115. *GRECO recommended (i) establishing a register of outside/secondary activities in the Police and the Gendarmerie, and (ii) developing effective oversight arrangements in this respect.*
116. The authorities indicate that the internal centralised and integrated human resources e-management information and communication system (the e-MRU platform), which is used by both the Police and the Gendarmerie, has been updated to include a dedicated tab (page) for recording outside/secondary activities. Data is entered upon approval of the request to exercise outside activities by the head of the relevant unit. To date, approximately 5,400 requests have been recorded in the system, with around 4,800 individuals currently authorised to engage in external activities. The forthcoming Code of Ethics is to include rules related to regular integrity checks throughout the careers of law enforcement officers, including the monitoring of secondary activities.

117. GRECO takes note of the authorities' information that a dedicated section has been created in the internal e-MRU platform used by the Police and the Gendarmerie to record information on secondary activities carried out by law enforcement officers. While acknowledging the classified nature of the system, GRECO takes note of the figures provided and considers them sufficient to regard the first part of the recommendation as implemented. Work is underway to implement the second part of the recommendation, by introducing regular monitoring of secondary activities in the forthcoming Code of Ethics.
118. GRECO concludes that recommendation xxiv has been partly implemented.

Recommendation xxv

119. *GRECO recommended that a study be conducted concerning activities by law enforcement officers after they leave the Police and the Gendarmerie and that, if necessary, in the light of the findings, rules be adopted to ensure transparency and limit the risks of conflicts of interest.*
120. The authorities indicate that a study on post-employment activities of law enforcement officers after they leave the Police and the Gendarmerie has been carried out by the Directorate General for Anti-Corruption. The study found that the transition of the MAI staff to the private sector is a natural phenomenon, driven by factors such as the need for a decent living, professional development and diversification of career opportunities. In recent years, legislative changes regarding the statutes governing police and military personnel have allowed engagement in duties, which has further contributed to increased mobility in the labor market. Also, the relatively low average retirement age (45-50 years) has facilitated interest in hiring former MAI personnel, thereby accelerating this process. According to the study, 21% of former police officers and 18% of former gendarmes were rehired in other public or private sectors.
121. Although most of the activities undertaken by former law enforcement officers (LEOs) did not involve a direct risk of conflict of interest, the absence of an institutional monitoring mechanism has made it difficult to identify specific risk cases. Some of the proposals under consideration include: introducing an obligation for private sector employers to verify whether post-employment restrictions apply to former LEOs; requiring private sector employers to notify the MAI, including the Police and the Gendarmerie, when hiring former LEOs; requiring former LEOs to inform human resources departments of their intentions to take up new employment or seek prior opinion or approval; and creating an electronic system to monitor post-employment activities of former LEOs.
122. GRECO positively notes the conduct of a comprehensive study on the post-employment activities of former law enforcement officers and encourages the authorities to continue examining and pursuing the proposals arising from it in order to limit any risks of post-employment conflicts of interest. It considers that, pending the follow-up to be given to the study's proposals, this recommendation has been partly implemented.

123. GRECO concludes that recommendation xxv has been partly implemented.

Recommendation xxvi

124. *GRECO recommended that (i) the Police and the Gendarmerie as well as the Ministry of Internal Affairs undertake a review of the current whistle-blower rules and procedures in order to make them compliant with the new Law on the Protection of Whistle-blowers, and (ii) law enforcement officers be trained and informed on a regular basis about the reporting channels and the whistle-blowers' protection measures provided for in the new Law on the Protection of Whistle-blowers.*

125. The authorities report that a procedure on the protection of whistleblowers was adopted by the Gendarmerie and the Police, with the support of ANI, in 2023 and 2024. The procedures are published on the respective intranet pages and websites³⁴. A person has been appointed and trained at the level of each unit within the Gendarmerie and the Police entrusted with addressing whistleblowers' complaints and carrying out follow-up actions. Reports can be submitted online, via e-mail, by mail to the address of the Gendarmerie or the Police or in person.

126. A 2024 evaluation report³⁵ by the technical secretariat of the National Anti-corruption Strategy found that the Gendarmerie had designated staff responsible for handling reports and had adopted internal procedures for receiving, examining and resolving complaints, while ensuring that staff are informed of their existence. These measures demonstrated efforts to align with legal requirements and to increase institutional transparency and integrity. The report also noted progress in setting up an electronic reporting register and in providing information and awareness-raising measures. However, the report identified shortcomings regarding the complaint resolution process, where hierarchical approval of reports affected compliance with the principle of autonomy laid down by law. Also, the process of maintaining confidentiality and information flow posed operational risks that could be addressed by designating a single structure for managing whistleblower reports.

127. In addition, Gendarmerie's unit commanders have received training, and staff has been informed of these measures, including the operationalisation of internal and external reporting channels for whistleblowers. The Internal Managerial Control Department of the Internal Control and Verifications Directorate has been designated as the internal reporting channel for the General Inspectorate of the Gendarmerie and external channel for subordinate units. When appropriate, the General Inspectorate refers whistleblowing reports to ANI while ensuring the confidentiality and integrity of whistleblowers.

128. GRECO notes that whistleblower protection procedures have been developed within both the Police and the Gendarmerie to align with the Law on the Protection of Whistle-

³⁴ <https://politiaromana.ro/ro/informatii-publice/avertizor-in-interes-public> and <https://www.jandarmeriaromana.ro/avertizori-interes-public>

³⁵ <https://sna.just.ro/ro/a/2024/raport-de-evaluare-tematica-a-inspectoratului-general-al-jandarmeriei-romane>

blowers. While it considers that the first part of the recommendation has been implemented, it encourages the authorities to consider establishing a single internal reporting channel for each institution, rather than separate channels within each subordinated unit, in order to preserve whistleblower confidentiality, ensure consistency in approach and responses, and enable swift, efficient and uniform processing of reports, as recommended by an external evaluation report. Regarding the second part of the recommendation, training and awareness-raising activities should be organised for all law enforcement officers, not only for managers.

129. GRECO concludes that recommendation xxvi has been partly implemented.

III. CONCLUSIONS

130. **In the light of the foregoing, GRECO concludes that Romania has implemented satisfactorily or dealt with in a satisfactory manner only 2 of the 26 recommendations set out in the Fifth Round Evaluation Report.** Of the outstanding 24 recommendations, 22 recommendations have been partly implemented and 2 have not been implemented.

131. More specifically, recommendations xv and xvii have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations i-vii, ix-xiv, xvi, xviii-xxii, and xxiv-xxvi have been partly implemented and recommendations viii and xxiii have not been implemented.

132. As regards top executive functions, the adoption of Law no. 49/2025, which introduces ethics and conduct norms for Government members, is crucial for the full implementation of certain recommendations. The entry into force of this Law should be complemented by the development of guidelines, the organisation of training sessions, the provision of confidential counselling and the establishment of proper monitoring and enforcement. A code of conduct for the Presidential Administration has also been adopted and published, which should be supplemented with guidance and documented briefing sessions. That said, rules of conduct for the President are still absent, although s/he remains subject to relevant legal provisions. While rules governing interactions with lobbyists and third parties appear to exist, the disclosure of such contacts is absent. The President, the Prime Minister, and Presidential Councillors are not subject to the obligation to disclose *ad hoc* conflicts of interest, which applies to other PTEFs. The Presidential Administration continues to publish the gift register, while the Prime Minister's Chancellery and ministries have yet to do so. Integrity plans for ministries have been published, as has the integrity plan for the Presidential Administration, but they do not cover PTEFs. The capacity of the DNA has increased, and a platform capable of generating red flags based on in-depth checks of assets and interest disclosures, has been launched. Nevertheless, further tangible progress is still needed in carrying out effective integrity checks for PTEFs, making legislative proposals to revise the current integrity framework, establishing a dedicated oversight mechanism to monitor the implementation of the access-to-information legislation, limiting the practice of legislating through emergency ordinances, introducing post-employment restrictions and ensuring the conduct of adequate and meaningful public consultations.

133. Regarding law enforcement agencies, the Gendarmerie has created a dedicated webpage for the publication of all donations. A unified draft code of ethics for both the Police and the Gendarmerie is at an advanced stage of development. A comprehensive training curriculum in the field of integrity has been developed, which will be updated following the adoption of the code of ethics. Integrity checks are conducted during initial recruitment, and two notable proposals for conducting regular checks during the careers of law enforcement officers are under consideration. A centralised recruitment portal for positions within the Police and the Gendarmerie is operational, ensuring open and transparent competitions. However, additional measures are needed to reduce the use of empowerment to fill management positions. A rotation system is in place, which should be explicitly linked to areas identified as particularly exposed to corruption risks. The internal centralised and integrated human resources system has introduced a dedicated section recording secondary activities, and work is underway to develop effective oversight arrangements. A comprehensive study of the post-employment activities of former law enforcement officers has been conducted, accompanied by several proposals to mitigate the risks of post-employment conflicts of interest. Both the Police and the Gendarmerie have aligned their procedures for the protection of whistleblowers with the Law on the Protection of Whistle-blowers. Concrete measures are also required to increase the representation of women at all levels, and to introduce rules for the disclosure and management of conflicts of interest within the Gendarmerie.
134. In the light of the foregoing, GRECO notes that further progress will need to be made within the next 18 months to achieve an adequate level of compliance with the recommendations. In accordance with Rule 31 revised bis, paragraph 8.2, of its Rules of Procedure, GRECO calls on the head of the delegation of Romania to submit additional information regarding the implementation of outstanding recommendations (namely recommendations i-xiv, xvi, and xviii-xxvi) by 31 December 2026.
135. GRECO invites the authorities of Romania to authorise, at their earliest convenience, the publication of this report, and to make a translation of it into the national language available to the public.