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# POLICY PAPER

## Strengthening the role of civil society in prevention and fighting corruption in Moldova

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## I. INTRODUCTION

Prevention and fight against corruption is considered one of the highest priorities in Moldova. With the recent polls showing that corruption is perceived as the biggest problem of the country with over 90% of the citizens mentioning it as the first and the most pressing problem<sup>i</sup>, it is clear that the involvement of all stakeholders in fighting this phenomenon is absolutely essential.

The role of the civil society is even more important in countries like Moldova, as there is still weak citizen involvement into the core of the decision making processes within the branches of powers, whilst the public institutions are still exposed to very high risks of political involvement and lack of integrity.

Civil society thus should be considered the voice of the citizens in between regular elections, having a watchdog function over the political promises of parties and the reality in the post-election period. Particularly important is the horizontal aspect of promotion of integrity and the fight against corruption, which should contribute to the better results for public institutions and in the end benefit the citizens of the country.

There are many aspects of the prevention and the fight against corruption. We shall focus on the aspects which have the highest impact and potential for spill-over effects for other sectors. Thus, we propose to review the capacities of the civil society in *prevention of corruption in the public sector*, focused on ex-ante and ex-post integrity verifications of public officials, *income and expenditure of political parties*, *efficient use of public funds by central and local public administration* and the *delivery of public services*.

With respect to the capacities to fight corruption, although civil society is not entrusted with criminal investigation competences, as this is the function of the law enforcement bodies, it can however contribute with additional added value in reviewing the current institutional structure of fighting corruption and propose solutions of improvement via public statements, expert opinions and indirectly through MPs or other subjects who hold legislative initiative rights.

## II. Current position of civil society in prevention and fight against

As we have mentioned above, the interest of the current policy paper is to first assess the current level of involvement of civil society in prevention and fight against corruption with the perspective to improve its role and capacities, using best practices coming from the Estonian example. We will briefly describe the setup of the integrity of public officials, political parties' expenditures, use of public funds and the delivery of public services and present the position of the civil society in these processes.

### II.1. Integrity verifications of public officials

The recent legislation<sup>ii</sup> approved by the Moldovan Parliament sets a new framework for the activity of the National Integrity Agency (NIA), which holds competence to review the income and property statements of public officials. Thus, the Law on declaration of property and personal interests sets the framework for the presentation by public officials of their statements. Additionally, the Law on the NIA sets the institutional framework for the management of the statements verification process. Among others, there are two important aspects which the two new laws offer from the perspective of civil society involvement in the prevention process: the statements are public and the NIA is monitored by a

Corruption is perceived as the biggest problem in the country by over 90% of the Moldovan citizens

New integrity legislation for public officials still not implemented after almost one year since approval

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Council, who has two representatives of the civil society.

Although the new legislation does offer improvements with respect to the prevention of corruption using the statements of property and personal interests as instruments to discourage corruption and offer civil society the possibility to participate in the management of this prevention mechanism via their participation in the Council, there are serious concerns with respect to the practical application of the legislation.

*First*, the Authority is still not functional, although almost a year passed since the law was adopted. The statements that the Authority is to collect from public officials are not yet verified by integrity officers, as they have not been appointed yet. This is because the director and the deputy of the Authority were not yet appointed by the Integrity Council.

*Second*, the process of selection of the representatives of the civil society in the Integrity Council, which took place last year, was subject to heavy criticism as to the objective nature of the selection process, which the Ministry of Justice managed, as empowered by the new law. This condition may seriously impede the civil society from genuinely participating in the decision making process with respect to the functionality and the effectiveness of the National Integrity Authority.

*Third*, the data on the income statements is not properly reviewed, as there are plenty of statement of property and personal interests which are not reviewed due to lack of manpower. Also, there is no electronic statement placement mechanism yet established, as this is part of the management process which the director of the Authority is entrusted with and who is not yet in place.

With these impediments eliminated, the task of civil society in review of public officials' statements is still there and will need reinforced effort to empower civil society effectively monitor as an alternative the statements from public officials.

Abusive application  
of the personal data  
legislation

Much of the effort civil society undertook, including via investigative journalism, highlighted one particular problem with respect to the practical application of the law on personal data protection. Thus, access to data with respect to the property of public officials is limited in many instances by the refusal of holders of data on property, backed by the reason that if released it will breach the law on personal data protection. Second aspect is related to the cost of access of data with respect to shareholders, real estate, bank accounts and other information which is linked to property, as there is a rather high fee to access the information which is accessible after the personal data protection filter was applied to the requests of disclosure of data from journalists.

These restrictions do not offer civil society an active role in prevention of corruption from the perspective of integrity verifications. Even with those in mind, there are still sufficient cases when public officials have not declared property and have been accepted to office. These are however only the ones which the journalists can effectively pursue and taking into account the substantial barriers to access of information, it is presumed that the actual number of suspicion of lack of integrity due to disproportionate property compared to declare income is much bigger. One prominent property statement from one judge, who was promoted in the Supreme Court of Justice is the declaration of a Porsche Cayenne worth of 11.000 MDL (approximately 550 EURO). Other cases involved estates identified in the course of investigations, which worth tens of millions of MDL and which are either in the property of the public official and have not been declared, or in the property of a relative, who cannot afford based on his/her activity (pensioner etc.) to have such estates.

NGOs should consider enhanced property disguise techniques to efficiently monitor public officials' property statements

With the perspective that these significant impediments will be lifted, there are some important aspects related to the civil society's capacity to effectively prevent corruption should be mentioned.

*First*, the civil society representatives will have to learn how to read through the data that will be available to them once the technical solutions related to the filling in of property statements will be resolved. This means that an understanding of how usually property is disguised should be considered. With the progress in the application of the integrity legal package, more sophisticated forms of disguise could be used. Among them, foreign bank accounts and the issuance of administration powers of attorney for businesses may be used. The Panama Papers leak is a strong indication that the use of off-shore jurisdictions and intermediaries is common practice and should be seriously considered while empowering Moldovan civil society. As it becomes practically impossible to obtain data from another jurisdiction as a civil society representative from Moldova, cooperation with similar civil society representatives from other countries is absolutely essential to ensure exchange of data. Cooperation with the EU Member States' civil society representatives should provide an important step forward in this capacitation process, as there is a great deal of expertise that can be used in the Moldovan case and the presence of peers in EU Member States, where legislation on access to data is not applied as restrictive as in the Moldovan case, is another reinforced tool of access to information at a more global scale.

*Second*, as data will expand and will become more accessible, a prioritisation of integrity verifications should be made. Obviously there will be a much bigger interest to verify integrity of higher officials, as they will generate higher impact and act as a strong disincentive for the middle and lower level public officials from exposing themselves to suspicions of lack of integrity. These high profile verifications will require stronger capacities. Although not a news for the EaP countries, civil society is not sufficient strong to be self-sustainable and most of the income civil society receives is from external donors.

## II.2. Income and expenditure of political parties

The political parties should play an important role in the promotion of integrity standards and in the fight against corruption. Their contribution may be important from at the least the following key perspectives:

- a) Promotion of integrity standards within the political party
- b) Transparency of financial flows within the party, both at the stage of receipt of funds and financial expenditures during their day-to-day activities and during electoral campaigns
- c) Promotion and approval of legislation, especially when holding seats in the Parliament

Further below we shall review these aspects of integrity and see how the civil society may further contribute to the attainment of these high standards of integrity, which may have a strong spill-over effect on the society at large.

### *Promotion of integrity standards within the political party*

This aspect has been mostly on the declarative side in the agendas of political parties. Formally, all political parties acknowledge that their party members have integrity and they their participation within the political parties are only linked to the aims the political party has – promotion of a particular political agenda. In reality however, their integrity is not subject to a due integrity check, except ad-hoc internal reviews of quality of party members. The high level officials of political parties usually do not act based on a minimum set of requirements of

High level political parties' representatives should be considered for ex-ante and ex-post integrity

integrity and transparency, such as declaration of property and interests when entering the office and after that during regular periods of time. This does not mean that the leaders of political parties are necessarily corrupt. However, lack of an internal best practices guidebook reduces the level of trust in political parties generally from the citizens, which in the case of Moldova is dangerously low.<sup>iii</sup>

The legal instruments available for candidates from political parties are only linked at the campaign stage and are managed by the Central Elections Commission. However, the prior internal integrity verifications are not legally regulated. An important step forward to promote internal integrity within political parties are either specific provisions in their statutes or a list of best practices. This particular stage of verification of integrity of members of political parties, particularly of those who hold decision-making functions, may be promoted by the civil society. Another function civil society may have, is to independently conduct integrity verifications themselves with respect to the key leadership persons within the political parties. This second form is however very costly and requires access to personal data, which in the current Moldovan context, as seen above in the previous chapter is both cumbersome and expensive.

#### *Transparency of political parties' financial flows*

The funding the political parties receive to conduct their activity greatly shapes their subsequent behaviour. If the funds are coming from a large number of donors and the received amounts are not disproportionately high compared to the average national income, then there are additional guarantees that the political party will genuinely seek the political agenda and the priorities approved by the internal bodies of the political party. This in turn assures internal democracy within the party as the decision-making process is based on debates and consensus.

On the contrary, if the funds are coming from disguised sources, if their number is reduced, there is a high risk that the independence of the political party is jeopardised and when the time will come to take important decisions which directly impact the society at large, such as approval of legislation, promotion of strategic directions of the country, the decisions may be influenced by the initial donors of the party. This condition is thought to happen within some of the political parties in Moldova. Some of the recent journalistic investigations show that the sources of funding for electoral campaigns of some political parties come from off-shore jurisdictions, i.e. from undisclosed sources.

On the other hand, the current legislation with respect to party financing is favouring rather large amounts of financial donations to political parties. Thus, the physical entities may donate up to 1 million MDL (about 50.000 EUR) and the legal entities may donate up to 2 million MDL (about 100.000 EUR) per year. At the same time, Moldovan citizens who are not resident in Moldova cannot donate for political parties. There are no restrictions whatsoever with respect to the sources of the financial means donated to the political party, which can be extracted from the primary legislation. One of Decisions of the Central Elections Commission states that if a donation is more than 75.000 MDL, the Commission forwards the data to the fiscal authorities, who will review the source of these financial means. This benchmark is only valid for donations during electoral campaigns and not for donations received by political parties outside of the campaigning period. Also, the donations are not restricted to the own sources of income of the donor, which means that various forms of civil contracts such as loans, donations and other contracts which transfer property rights to individuals may be employed as a measure of disguise when financing political parties from

Political parties can still benefit from disguised sources of funding, which greatly diminishes their independence and jeopardises the multi-party and pluralism principles

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non-transparent funds.

This rather liberalistic regulation of the financing of political parties has a profoundly negative impact on the integrity and internal democracy of political parties and neglects other important electoral and party building rules such as equal opportunities during the campaigning periods and in the development of regional structures.

Except the limited scrutiny from the Central Elections Commission, which is not best placed to review complex financial data, there are no other specific instruments to monitor the financial activity of political parties.

Two important examples from Estonia may be promoted in Moldova with respect to the financial transparency of political parties.

First, the Estonian electoral and party financing legislation requests from donors the source of the funds they donate to the political party. Provided they donate funds or property which is their own and was obtained as a result of their own economic activity (no loans, donations etc.), the donations from citizens are not limited to a particular threshold. Legal entities are prohibited to donate to political parties. This solution has its strong reasons, particularly with respect to the access of legal entities to public procurement contracts, which may be linked to the political parties' interests when managing public procurement contracts and to the freedom of the legal entities to enter into contractual relations with various other legal entities, including from off-shore jurisdictions.

Second, Estonia created a Parliamentary Party Funding Supervision Committee, which scrutinises the way the political parties are using the funding they receive. With a composition comprised of both governing parties and opposition parties, as well as three members from constitutional institutions, the Supervision Commission has struck a fairly good balance with respect to the interest in genuinely scrutinising the funding and expenditures of political parties. The Commission also reviews the local public administration spending, if there reasons to believe that they have been used for political promotion purposes. Among the recent examples of efficient Commission scrutiny are the cases of political advertising paid out of local budgets which have been disguised as electoral awareness campaigns by the former mayor of Tallinn.

Although there is no such entity in Moldova and it is not mandatory to follow in full the institutional settings employed by Estonia with respect to the supervision of funding of political parties, there are opportunities to enhance the functions of the Central Elections Commission.

The civil society has been active in the promotion of higher transparency and more scrutiny of sources of funding of political parties. Among the latest initiatives is the Civil Society Strategic Anticorruption Priorities, which sets among others more involvement with the political party financing.<sup>iv</sup>

#### *Financial transparency policy promotion*

The political parties hold a decisive role in promoting policy improvements when they reach the level of sufficient public support after ballots. Their incentive to promote improvement to legislation is however dependant on the previous aspects we have already touched upon. If the previous two conditions are not met, i.e. the interest to promote the integrity of party members and to make transparent and as diversified as possible the sources of funding, there would most probably be little incentive from the political parties in power to bind with adoption of more stringent legislation enhanced scrutiny of the financial sources of political parties.

Political integrity should be promoted by the civil society representatives and the agents of change should embrace financial transparency policies for political parties



This aspect may be reinforced with newly created parties and the civil society should play a key role in promoting these changes. It is thus crucial for civil society to engage with “agents of change” within the existent and newly created parties, by both promoting these important policy changes and passing-on their ownership to the most active politicians.

### II.3. Efficient use of public funds

The efficient use of public funds is not a novelty for any jurisdiction. Clearly, it is in the interest of the tax-payers to see some good use of their contributions as members of the society. The scrutiny over the use of public funds is however subject to a number of restraints as to the reporting requirements, especially with respect to the public procurement expenditures, other forms of use of public property (PPPs, concessions etc.) the genuine competition required for such contracts and the access to open data.

Although not the particular subject-matter of this policy paper, it is worth noting that open data with respect to public expenditures is still not available in the case of Moldova, unlike Estonia, where open source platforms managed by the Ministry of Finance, offers access to public expenditure information for both central and local public administration. Access to the general public to such data is not an end result in itself but, may significantly contribute to the effectiveness of implementation of other cross-cutting policies, such as fight against high level corruption. It also encourages citizens be more proactive in the fight against corruption.

We have to underline that efforts were taken by the Government to disclose data to the public.<sup>v</sup> To be able to extract information from the publicly available data, additional skills must be developed for CSOs. This tool should further expand and offer more disaggregated data to the public, particularly important for the civil society as the monitor of public expenditure.

Thus, the comparative analysis of data on the essence of public procurement contracts, their effectiveness, including ex-post review of the quality of public works (examples of frequent repair of the same roads indicates on public procurement inefficiencies and possible corruption), list of contractors, including the concentration of contractors to particular works (no genuine competition with possible corruption at the award stage), digitising of other property management actions (such as PPPs and concessions) are all actions that the civil society representatives may take to underline lack of effectiveness in use of public funds and employ a more active involvement of the law enforcement bodies.

To be able to succeed in this endeavour, civil society should enhance its capacities in data reading and cross-checking of information, which may offer verifiable data on potential acts of corruption.

### II.4. Delivery of public services

Public services have been the interest of citizens, particularly with respect to their costs, efficiency and effectiveness and transparency of the decision-making process. While there have been attempts to on-stop-shop the public services, this did not offer the necessary results in most instances, as each entity created its own one-stop-shop, which is a wrong line to follow in the first place. The reason behind having a one-stop-shop approach in public services is that it excluded multiple applications for intermediary results and allows the beneficiary of the public service obtain the final result. With multiple one-stop-shops in place this is not possible.

The recent developments in Moldova with respect to the central public

The open data Government principle implies the review of the current architecture of public databases and their interoperability

administration reform, including the optimisation of delivery of public services, the re-engineering of some public services, including the review of the business processes and the elimination of services which are redundant, offer a new niche for involvement for civil society in the country.

There have been actions taken by some NGOs in Moldova to monitor the efficiency and the effectiveness of local public services, particularly the ones provided under the one-stop-shop principle. The monitoring underlined the lack of effectiveness or non-functionality of the one-stop-shop principles when applying for certain public services. Although local public authorities, including the ones of the Chisinau municipality, have committed to implement such systems to eliminate the human factor and thus the risks of corruption, the phenomena of delayed issuance of permissive acts for entrepreneurs is very wide spread. This condition is largely artificial and is generated by some public servants to promote corruption and favouritism when reviewing applications.

Some recent examples of civil society involvement show that there is great potential to promote local public administration reform from the perspective of service delivery.<sup>vi</sup>

Important changes can be attained by civil society in promoting the agenda of reformed and accessible public services, provided both by the central and local public administration authorities. In this respect, the interoperability of public databases and interconnection of public entities who provide services of public interest should be promoted by civil society and further monitored. The recent creation of the Public Services Agency is an additional instrument of leveraging and monitoring from the civil society. Evaluation of performance of the Agency should focus on the quality and the costs of public services, including the methodology of formation of prices, timeliness, the reasons for a public service to exist in the first place, such as extracts from registries, which can already be accessed by all the other public entities.

The focus on the local public administration authorities should be primarily with respect to the transparency of the decision-making process within the local administration as regards the permissive acts. These documents are often subject to corruption, including with respect to construction of new buildings, trade permissions etc.

### III. Best practices from the Estonia

The Estonian example is considered viable not only for the Moldovan case and is the result of nationwide digitisation and openness of public data to the citizen. There are at least three horizontal decisions which have revolutionised the entire country from the perspective of open and accountable democracy – digitisation of citizens by means of electronic IDs, the openness of data held by public institutions to the citizens and the interoperability of the public databases.

All three horizontal solutions had spill-over effects in specific sectors and enhanced the possibilities of citizens to scrutinize the public and make it much easier to depict integrity from corruption. Further below we shall review these three horizontal solutions from the Moldovan perspective and argue in favour of their implementation.

#### III.1. Digitisation of the population

The issuance of IDs with electronic signature to the Estonian citizens offered enhanced access to the public services and strengthened the interaction of the citizens with the public institutions. An electronic identification applicable to all

Multiple one-stop-shops and continued involvement of the human factor in local decision-making process undermines quality of public services and promotes corruption

Electronic ID and signature coupled with multiple remote services revolutionizes democratic governance and ensures genuine e-Government

citizens reduced the various forms of interaction from the public institutions side and allowed focus on this particular form of remote interaction with the citizens. The general impact of the use of IDs with electronic signature is reduced human factor in the course of interaction and thus reduced risks of corruption. Also, the remote identification is an efficient tool to access data of public interest, an effect which is essential when coupled with the other two horizontal measures.

### III.2. Openness of data held by public institutions

Although it is acknowledged that this horizontal measure may not take place instantly and requires both policy changes and internal practices within the public institutions, its effects are essential from the perspective of our subject. Openness of public data is a prerequisite for effective scrutiny from the citizens individually and from the civil society. There is no need to focus anymore on cumbersome procedures of access to data of public interest. Instead the efforts are directed towards identification of potential cases of abuse of power, misuse of funds, bid rigging, favouritism and other expressions of lack of integrity and corruption in the public sector.

As data of public interest is already coming on-line, the focus in the upcoming years of the civil society is strengthening its capacities to read, process and highlight potential cases of corruption. Coupled with an increased interest from citizens, particularly those who are actively contributing via payment of taxes and other mandatory payments, such cases should both help the law enforcement agencies act more efficient in fulfilling their mandate, and discourage any further acts of corruption. It is thus essential at this stage, with access to public data being gradually offered, that the civil society enhances its analytical and research skills. This process of on-the-job research should further depict gaps in disaggregated data and allow fine-tuning of the on-line open data systems.

### III.3. Interoperability of the public databases

The interconnection of the public databases is a prerequisite for the implementation of the genuine one-stop-shop principle with respect to public services. With the remote access to public services from the beneficiaries' side, the interoperability of public databases does not require any additional efforts from the beneficiaries and eases up the work of the service provider – the public institution. This enhanced level of digitisation, after the public databased have been created and the citizens empowered with electronic identification, makes redundant any practice of additional requests for authentication and excludes many of the services which are just intermediary products in the business process chain.

Moldova is in the process of the implementation of the interoperability of public databases and among the priorities on the Moldovan Government's agenda is the interconnection of the public databases owned by the five entities which were recently merged into the Public Services Agency. However, interoperability should only begin here, with other entities which hold public databases necessary to be interconnected.

Although technical and very specific in IT terms, this step should be scrutinised by the civil society to ensure that the benefits in the Moldovan case are attained, namely the elimination of the human factor and the reduced costs of public services.

To strengthen the role of civil society, more focus should be put on the analysis of the methodologies of delivery of services and calculation of fees, which the Public Services Agency will approve in the near future and the analysis of the list of services. The later should pay attention to the redundant services, which

New data search opportunities and vast accessible data requires enhanced analysis and monitoring skills

Interoperability of public databases excluded redundant services and makes more efficient the remaining ones

elevate the costs and decreases public satisfaction. The CSOs have a window of opportunity in the current reform process and could promote more public sector efficiency via the interoperability instrument, using the Estonian best practices.

#### III.4. Scrutiny of financing of political parties

This particular example of scrutiny should be considered as high priority in Moldova, especially for the Moldovan NGOs. Although the institutional settings are different in the two countries, the financial supervision of political parties should be seen in context with the legislation which regulates the sources of funding. The presence of the civil society in the financial supervision process should be promoted in the Moldova case to increase the trust and reliability of the decisions issued by the supervision body.

As of today, the Central Elections Commission is reviewing the financial reports of the political parties. However, the degree of review is reduced with respect to the regular day-to-day activities of the political parties and only increases in pace during the electoral campaigns.

More efficient financial supervision could be attained in the Moldovan case either through increased competences offered to the Central Elections Commission, which would also obtain the power of application of fines, extend the supervision to the local budget expenditures, disguised as for public interest, but in reality pursuing a political party interest (advertising, party image promotion etc.), or create a separate entity, with public servants specialised in finances and financial services, to restrict illegal party financing.

These institutional changes should come together with legal amendments to the sources of party financing, including allowed sources of funding and means of verification of the sources. This issue was already tackled by civil society on numerous occasions, including in the context of failed compliance with the Venice Commission and GRECO recommendations on the electoral system of Moldova.

CSOs could promote important legislative amendments to the financing of political parties, using the Estonian example of regulation. The timing is also important with respect to the recent Venice Commission opinion on the proposed reform of the electoral system.

### **CONCLUSIONS AND RECOMMENDATIONS**

Although many of the IT solutions implemented by Estonia are rather simple in technical terms, the actual practical implementation through which Estonia passed and the substantial jump forward it offered to the country should be seriously considered in the Moldovan case.

The IT solutions in management of population identification and its interconnection with electronic identity, access to open public data and the interconnection among the holders and managers of databases, offered transparency to the decision-making process and enhanced the possibilities to review the efficiency of public institutions.

Moldova is still in the process of achieving the three underlined horizontal measures with spill-over effects to other sector, including to promotion of integrity and efficient fight against corruption.

Effective implementation of the open public data, interoperability and electronic identification of citizens can all enhance the civil society's options to review the integrity of public officials, scrutinize the finances of political parties, public

Both policy and institutional improvements in financial scrutiny of political parties will have a strong multiplying factor for corruption prevention policies

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expenditure and review the quality of public services.

Openness of public data should not be seen as the panacea for integrity promotion or high level corruption. Instead, the availability of such data would come at a very high cost if it is not analyzed, monitored and used for proof-based civil society and journalistic investigations, as well as an important source of data for the law enforcement bodies entrusted with the fight against corruption, particularly high-level corruption.

There are thus two important aspects where the role of the civil society may be improved from the Estonian perspective with respect to promoting integrity and fighting corruption:

- a) Promotion of advanced and integrated IT solutions in Moldova to ensure transparency, accessibility and availability of open public data & revision of the protective personal data practices;

Enhanced in-house expertise in use, analysis and highlight of potential cases of integrity risks and corruption in the public sector, with specialization in financing of political parties, use of public funds, including public procurement and access to public services, particularly the ones linked to business permits and authorizations. With comprehensive data available and made public by CSOs, communication with EU institutions within the EU-Moldova Association Agreement, public statements highlighting corruption cases, there is higher pressure both on the Government and the law enforcement bodies to promote integrity and fight high-level corruption.

Prevention and fight against corruption is considered one of the highest priorities in Moldova. With the recent polls showing that corruption is perceived as the biggest problem of the country with over 90% of the citizens mentioning it as the first and the most pressing problem<sup>vii</sup>, it is clear that the involvement of all stakeholders in fighting this phenomenon is absolutely essential.

The role of the civil society is even more important in countries like Moldova, as there is still weak citizen involvement into the core of the decision making processes within the branches of powers, whilst the public institutions are still exposed to very high risks of political involvement and lack of integrity.

Civil society thus should be considered the voice of the citizens in between regular elections, having a watchdog function over the political promises of parties and the reality in the post-election period. Particularly important is the horizontal aspect of promotion of integrity and the fight against corruption, which should contribute to the better results for public institutions and in the end benefit the citizens of the country.

There are many aspects of the prevention and the fight against corruption. We shall focus on the aspects which have the highest impact and potential for spill-over effects for other sectors. Thus, we propose to review the capacities of the civil society in *prevention of corruption in the public sector*, focused on ex-ante and ex-post integrity verifications of public officials, *income and expenditure of political parties*, *efficient use of public funds by central and local public administration* and the *delivery of public services*.

With respect to the capacities to fight corruption, although civil society is not entrusted with criminal investigation competences, as this is the function of the law enforcement bodies, it can however contribute with additional added value in reviewing the current institutional structure of fighting corruption and propose solutions of improvement via public statements, expert opinions and indirectly through MPs or other subjects who hold legislative initiative rights.

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<sup>i</sup> For more details, please consult the IRI survey on Moldova, March 2017, available at: [http://www.iri.org/sites/default/files/iri\\_moldova\\_poll\\_march\\_2017.pdf](http://www.iri.org/sites/default/files/iri_moldova_poll_march_2017.pdf)

<sup>ii</sup> The Law no. 133 from 17.06.2016 on declaration of property and personal interests, for more details, please consult the Law (in Romanian) at: <http://lex.justice.md/md/366046/>; the Law no. 132 from 17.06.2016 on the National Integrity Authority, for more details, please consult the Law (in Romanian) at: <http://lex.justice.md/md/366044/>

<sup>iii</sup> For more details, please consult the IRI survey on Moldova, March 2017, available at: [http://www.iri.org/sites/default/files/iri\\_moldova\\_poll\\_march\\_2017.pdf](http://www.iri.org/sites/default/files/iri_moldova_poll_march_2017.pdf)

<sup>iv</sup> For more details, please consult the Public Appeal and the Civil Society Strategic Anticorruption Priorities at: <http://ipre.md/2016/12/13/public-apeal-the-strategic-priorities-civil-society/?lang=en>

<sup>v</sup> For more information, please consult the Open Data Portal, available at: <http://date.gov.md/>

<sup>vi</sup> For more details, please consult the Public Policy Proposal on reform of Department of agriculture and food safety and the Department of ecology and social affairs of the Chisinau municipality, available (in Romanian) at: <http://ipre.md/2017/04/10/politica-publica-reorganizarea-directiei-agricultura-si-alimentatie-publica-si-a-directiei-socio-ecologice/>

<sup>vii</sup> For more details, please consult the IRI survey on Moldova, March 2017, available at: [http://www.iri.org/sites/default/files/iri\\_moldova\\_poll\\_march\\_2017.pdf](http://www.iri.org/sites/default/files/iri_moldova_poll_march_2017.pdf)