

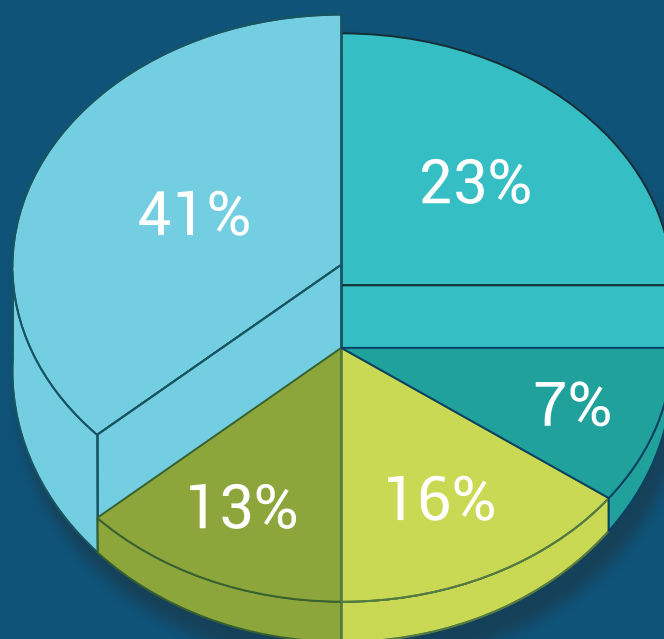


MONITORING REPORT

Transparency of local public authorities from Moldova in 2019

*(60 administrative and territorial units of first level and
32 administrative and territorial units of second level)*

Viorel PIRVAN



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The report is a product of the initiative "Supporting democracy, independence and transparency of key public institutions in Moldova". The initiative is implemented by the Institute for Development and Social Initiatives (IDIS) "Viitorul", in partnership with the Institute for Economic and Social Reforms in Slovakia (INEKO) and is financially supported by the Official Development Assistance Program of the Slovak Republic (SlovakAid). The initiative aims to inform the public about the development of democracy and the independence of key state institutions, as well as to improve the transparency and financial stability of local public authorities and state-owned enterprises in the Republic of Moldova.

The opinions expressed in this report are those of the author and do not necessarily reflect the official policy or position of INEKO and SlovakAid.



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Summary

The Institute for Development and Social Initiatives (IDIS) “Viitorul” has assessed the level of transparency of Local Public Authorities (LPAs) in 2019 with the assistance provided by the Institute for Economic and Social Reforms (INEKO) under the initiative “Supporting democracy, independence and transparency of key public institutions in Moldova”. IDIS “Viitorul” in partnership with INEKO implement this initiative with the financial support provided by the Programme for Official Development Assistance of the Slovak Republic. The initiative is aiming to raise public awareness about democracy developments and independence of key public institutions, as well as to improve transparency and financial sustainability of local public authorities and public undertakings. The ranking of the most transparent local public authorities is available at: www.localtransparency.viitorul.org.

The monitoring of Moldovan local governments of first and second levels was launched in 2016 and continues to date, having revealed persisting issues and deficiencies in ensuring transparent operation of these local governments.

The overall transparency average for 32 districts subject to monitoring equals to 37.67%, showing an upward trend relative to the average value determined for the four rankings conducted so far. On the other hand, the overall average for 60 of the largest towns and villages equals to 24.03%, showing a decline in comparison with the 2017 and 2018 rankings, although having a slightly higher value than the overall average of transparency calculated for the 2016 ranking.

The Law on access to information remains outside the agenda of many local governments. Overall, the share of districts that responded to the questionnaire sent out by IDIS “Viitorul” and to the request submitted by a natural person soliciting public information made up 50 – 60%, while the towns and villages answered those requests to the extent of 40 – 45%.

The national rules aiming to ensure an efficient and transparent decision-making process are not entirely applied in practice. Nowadays, subjecting the local government draft decisions to public consultation has a sporadic and flawed pattern. The outcomes show that 41% of districts and 58% of towns and villages subject to monitoring failed to conduct public consultations in 2019. Nonetheless, when such consultations were organised their outcomes were never made public.

The local public authorities bring to the knowledge of citizens some information about public procurement through their websites, and the public is able to find such on the electronic platforms for public procurements. The monitoring results show limited transparency at all public procurement stages. Likewise, more than 1/3 of districts and circa 3/4 of towns and villages do not publish the monitoring reports on public procurement contract performance and the annual statements on public procurement of low value at the final phase. Although this is not binding, a municipality published all its public procurement contracts on the website, while three local and one district government published such contracts only partially.

The administration of public assets remains one of the most obscure areas in terms of transparency. Over 70% of local public authorities fail to make public both the tender notices for sales/rental/lease of immovable property owned by Administrative and Territorial Units (ATUs), and the tender outcomes.

Some local governments show a relatively good level of openness in terms of district and local budget development. Hence, only 1/5 of districts failed to publicly consult the draft budget and slightly over 40% of towns and villages failed to comply with this legal requirement. There are some achievements in terms of imparting the adopted budget. Approximately 80% of districts and 60% of towns and villages published their budget on the website.

Circa 1/3 of district authorities and 3/5 of local authorities do not post the data on public vacancies on websites, and 3/4 of districts and over 80% of towns and villages failed to make public the selecting/recruiting outcomes for filling the public vacancies in 2019.

Following the monitoring we managed to identify ten districts and two towns that developed the Ethics Code for Civil Servants. At the same time, none of the towns and villages published an Ethics Code for local elected representatives, while two districts posted such codes on their websites. More than half of the districts failed to post their anti-corruption plans and the plan implementation monitoring reports. More than 90% of towns and villages failed to publish documents aimed to ensure local government integrity.

As many as 20% of district authorities and 10% of local authorities publicly disclosed the information on the available social services, having described the services, having listed the beneficiaries, the conditions/criteria and how the socially vulnerable people/families may apply for such services.

The activity of municipal-owned enterprises (MoEs) and commercial companies in which the majority stake belongs to ATUs remains an opaque area for the general public. More than 90% of districts and towns/villages do not post the annual financial reviews of those public entities on the website, in spite of the fact that they, as founders, and in compliance with the legal requirements, are bound to impart such information to the public.

Therefore, the 2020 monitoring outcomes reveal major transparency issues for district and local authorities for all indicators subject to monitoring. This is due to the LPAs' failure to comply with the rules in place, and such state of affairs is relying on certain objective grounds, but also on lacking viable control instruments to hold accountable those in breach of the law.

Finally, the recommendations laid down in this report are intended, on the one hand, for the public authorities in charge for public policy development, improvement and implementation, and, on the other hand, for local governments to comply with the legal requirements on transparency and make public important information.

I. Research goal and methodology

The Institute for Development and Social Initiatives (IDIS) “Viitorul”, having taking up the Slovak experience and being supported by the Institute for Economic and Social Reforms (INEKO), continued to monitor the Moldovan local governments of first and second levels (hereinafter referred to as Local Public Authorities (LPAs) and the District Public Authorities (DPAs) to **establish the level of transparency** in their activity throughout 2019.

The research covered 32 districts and 60 ATUs of first level from the Republic of Moldova, of which 40 are towns (municipalities) and 20 are the largest villages (communes) across the country.

The assessment of LPAs and DPAs transparency was conducted from January through May 2020, using a quantitative approach based on the following instruments:

- questionnaires sent out to LPAs subject to monitoring, via which a series of public data was required;
- requests sent out by a third party to LPAs, demanding public information in compliance with the Law on access to information;
- information identified on the websites of LPAs and DPAs subject to monitoring;
- information from the web portals of other public authorities (www.declaratii.ani.md, www.cna.md, www.app.gov.md);
- information from public procurement web portals (www.mtender.gov.md, www.achizitii.md, www.e-licitatie.md);
- information from the State register of legal acts of the Republic of Moldova (www.legis.md);
- information from other web portals (www.facebook.com, www.youtube.com).

The Public authorities were assessed and assigned to **nine areas (transparency criteria), comprising 56 indicators for the DPAs and 54 indicators for the LPAs**. The assessed areas covered the jurisdictions and obligations legally assigned to settlement administrations, as well as those considered important for good governance, which, as per the international standards, belong to public information.

The outcomes are based on the data available to the public, which are easy to measure and verify. The maximum score for a settlement, including all areas, amounted to 100 points.

The overall ranking score may vary from 0% (the weakest) to 100% (the best). In order to make a quick comparison, the settlements were classified according to a gradual scale (from A+ to F).

| | Areas (Transparency criteria) | Share, in% |
|------|---|------------|
| I | Access to information | 16 |
| II | Participation in decision-making | 32 |
| III | Public procurement | 12 |
| IV | Administration of public property | 7 |
| V | Budgeting | 12 |
| VI | Human resources | 5 |
| VII | Ethics and conflict of interests | 6 |
| VIII | Social services | 4 |
| IX | Investments, municipal-owned enterprises and commercial companies' equity participation | 6 |

The ranking of the most transparent Moldovan settlements has been established following the conducted monitoring. **The ranking is available on the website:** www.localtransparency.viitorul.org. The previous 2016 – 2018 Rankings can be accessed on the same website, enabling the citizens to compare the data stored on the portal with the 2020 ranking outcomes.

The position assigned to a settlement in the ranking should reveal its transparency level. Hence, the higher the position of a settlement, the narrower the possibility for corruption and non-transparency. Nonetheless, one cannot consider that an extremely open public authority is corruption-free, and vice-versa. As a rule, an appropriate compliance with the legal requirements leads to a lower level of corruption, but they do not secure its complete eradication.

Essentially, this **ranking represents an instrument for the assessment of LPAs transparency, identification of their major issues, obstacles and shortcomings in this area, having provided them with the due support to boost the level of transparency.**

Moreover, **recommendations have been laid down aiming to improve transparency and ensure the provision of public information to citizens.**

More detailed information regarding the transparency criteria, indicators and questions referred to local public authorities is available in the ranking's web headings at: www.localtransparency.viitorul.org.

II. Transparency criteria assessment outcomes

1. Transparency developments in LPAs and DPAs

The overall transparency average for 32 DPAs subject to monitoring equals to 37.67%, showing a +7.73% – increase relative to the 2016 ranking and a slight increase of 0.39% in comparison with the 2018 ranking.

The local public authorities recorded a decline in this area. Hence, the overall transparency average equals to 24.03%, showing a 4.47% – drop in comparison with the 2018 ranking, though having excelled the overall average of the first 2016 ranking by +0.48%.

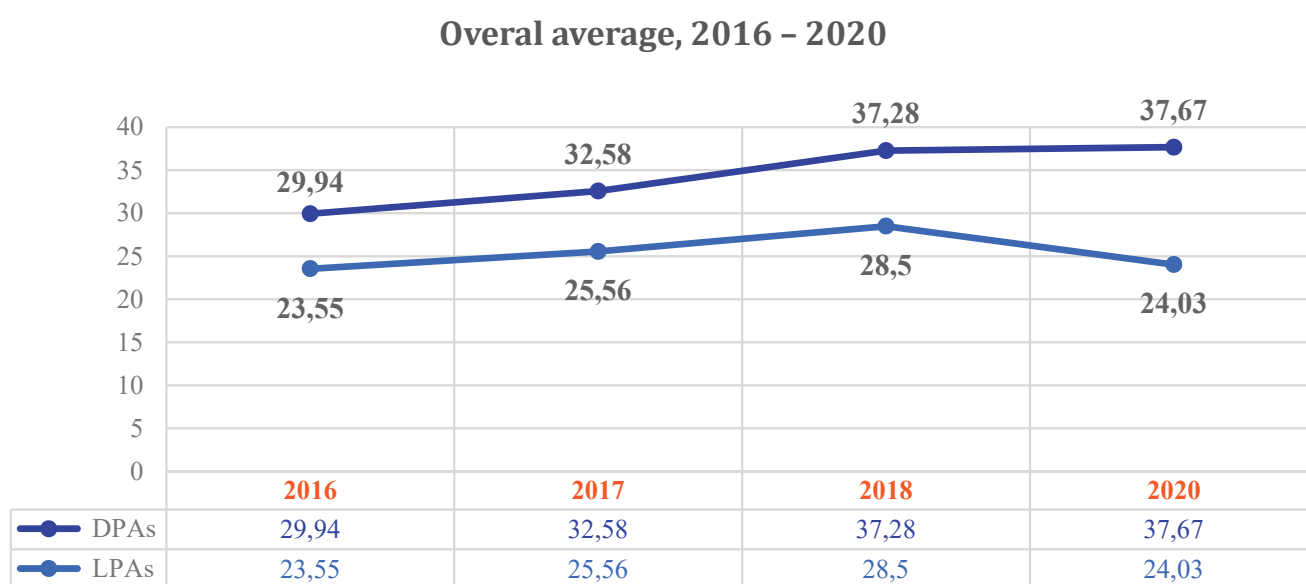
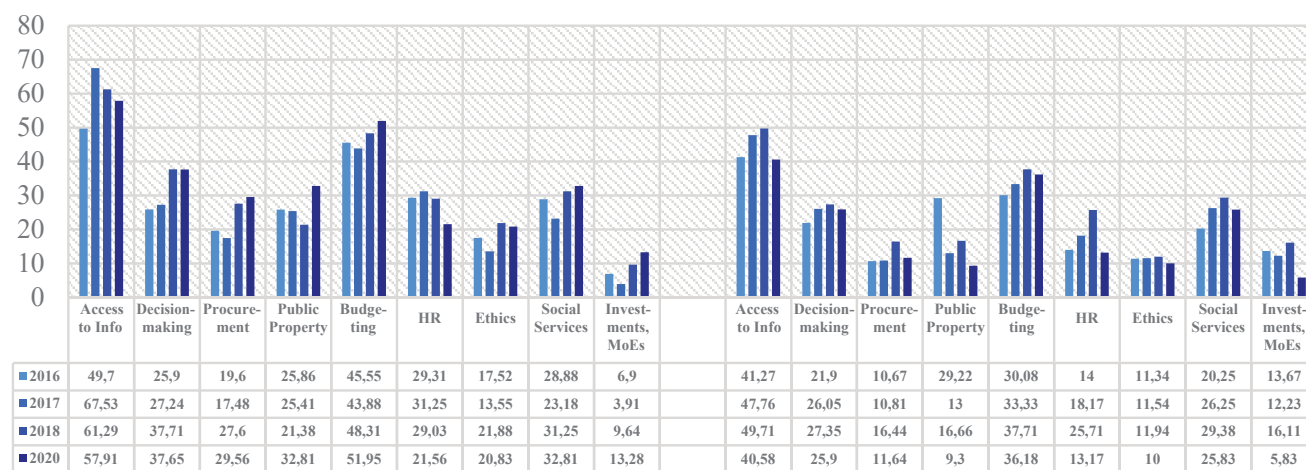


Diagram 1. Overall average of DPAs and LPAs transparency level in the 2016 – 2020 rankings

With respect to the average value for each transparency area, one may notice the percentage increase in five areas, namely public procurement (+1.96%), administration of public assets (+11.43%), budgeting (+3.64%), social services (+1.56%), and investments, municipal-owned enterprises and commercial companies' equity participation (+3.64%). Concurrently, several areas recorded a visible downward trend as follows: access to information (–3.38%), human resources (–7.46%) and, also, a slight retrograde in terms of participation in decision-making (–0.06%) and of professional ethics and conflict of interests (–1.05%).

In the case of local public authorities, the overall average ascended in none of the transparency areas subject to monitoring. To the contrary, one may determine a decline in the average value in all areas, namely: access to information (−9.13%), participation in decision-making (−1.45%), public procurement (−4.8%), administration of public assets (−7.36%) budgeting (−1.53%), human resources (−12.54%), professional ethics and conflict of interests (−1.94%), social services (−3.55%), investments, municipal-owned enterprises and commercial companies' equity participation (−10.28%).

Average by areas of transparency, 2016 - 2020



DPAs

LPAs

Diagram 2. Average values for each transparency area of districts, towns and villages in the 2016 – 2020 rankings

Despite the fact that all districts subject to monitoring gathered slightly over 1/3 of the possible maximum score, one could notice some progress as well. There are eight DPAs in the 2020 ranking (two more in comparison with the 2018 ranking), which scored more than 50%, including Falesti district (>60%), and Straseni district (almost 80%), which has been assigned to Class “A”. At the same time, none of the districts subject to monitoring has been assigned to the last class, i.e. class “F”, which means that they gained more than 10% out of the maximum score.

The most transparent districts, which scored the highest, include Straseni district with 78% (class “A”), Falesti district with 61% (class “B”), and Criuleni district with 60% (class “B –”).

In comparison with the 2018 ranking, one could notice some improvements in the 2020 ranking for Criuleni district (+14 positions and 23 percentage points), Floresti district (+13 positions and 34%), Donduseni district (+12 positions and 33%), followed by Soldanesti district (+11 positions and 23%), Cimislia and Dubasari districts (both +11 positions and 19%). Overall, 17 out of 32 districts improved their score. At the other end, 13 districts failed to show any progress so far. Hence, the most affected districts to be listed here include Glodeni district (−11 positions and −14%) and Cantemir district (−11 positions and −12%), followed by Calarasi district (−9 positions and −17%) and Edinet district (−9 positions and −11%).

Regarding the towns and villages subject to monitoring, along with the low annual overall average of just ¼ of the maximum possible score, there are also other declining outcomes. Hence, if the 2018

ranking covered ten local authorities scoring over 50%, out of which three scored over 60% and one scored over 80% (A+), then the 2020 ranking includes only five settlements (–5) scoring over 50%, of which Balti Municipality scored close to 80%, being assigned to class “A”. In spite of this fact, the number of settlements scoring over 50% is larger in comparison with the 2016 and 2017 rankings (+3). Likewise, circa 1/4 of settlements subject to monitoring failed to score over 10%, thus, being assigned to class “F”.

The most transparent settlements, which managed to attain the highest scores, include Balti municipality with 76% (class “A”), Chisinau municipality with 58% (class “B –”) and Falesti town with 56% (class “B –”).

The monitoring results revealed some improvements accomplished by certain settlements in the 2020 ranking in comparison with the 2018 ranking, as well as some serious setbacks in terms of their position in the ranking. Hence, one may notice the most significant improvements achieved by Peresecina village (+28 positions and 22 percentage points), Varnita village (+27 positions and 24%), Anenii Noi town (+27 positions and 19%), Congaz village (+21 positions and 13%), Riscani town (+20 positions and 14%), and Durlesti town (+20 positions and 11%). Overall, 26 settlements improved their scores. Setbacks have been noticed in 33 settlements, the most affected being Ungheni municipality (–41 positions and –40%), Gura Galbenei village (–37 positions and –33%), Drochia town (–34 positions and –30%), Rusestii Noi village (–29 positions and –27%), Zaim village (–26 positions and –32%), Criuleni town (–25 positions and –24%), and Costesti village (–22 positions and –32%).

2. Access to information

In order to ensure transparency and access to public information the Local Public Authorities (LPAs) use most often directory boards and web portals. Over the recent years, social networks also have been extensively used by the LPAs to post relevant information about their work. Social networks along with websites represent the most contemporary and efficient instruments for disseminating public information, as the directory boards do not suffice to secure citizens’ access to public data.

All 32 DPAs subject to monitoring have official websites intended to mirror their work and raise public awareness on public matters. On the other hand, **ten out of 60 towns and villages subject to monitoring have no websites or their websites are non-operational** (Donduseni, Criuleni, Otaci, Baurci, Corjeuti, Sipoteni, Gura Galbenei, Costesti, Chiscareni, and Rusestii Noi). In the absence of websites or in the presence of idle ones, transparency of LPAs activity is declining. This is due to the lack of financial resources required to develop and maintain the websites at the local level, as well as the shortage of personnel to administer those websites, to post new and update the existing information on a regular basis.

In order to facilitate the interested parties’ access to information on how a public authority develops and passes decisions, the authority’s official website shall include special headings dedicated to decision-making transparency, comprising the data referred to in paragraph 14 of Government decision no.967 dated 09.08.2016 on public consultation mechanism with the civil society in decision-making.

Following the performed review, it was found that five districts (16%) and 23 towns and villages (38%) have no headings dedicated to decision-making transparency on their websites. Out of the websites comprising such headings, 21 districts (65%) and 15 towns/villages (25%) managed to fill them appropriately, while the remaining websites contain incomplete information required by the legislation.

Circa 13% (4) of DPAs and 38% (23) of LPAs subject to monitoring do not bring the information about public meetings/sittings to be held to the attention of citizens, which should contain the meeting date, time, venue and agenda. Based on the provisions of the Law on local public administration no.436/2006, such notices shall be made at least ten days prior to the date of an ordinary meeting to be held and at least three days prior to the date of an extraordinary meeting in case of District Council meetings (Article 45), and at least five days prior to the date of ordinary meetings to be held and at least three days prior to the date of extraordinary meetings in case of Local Council meetings (Article 16). These requirements have been fulfilled by 19 districts (59%) and 13 towns and villages (22%) subject to monitoring. Other nine districts (28%) and 24 towns/villages (40%) partially notify their citizens about the meetings to be held.

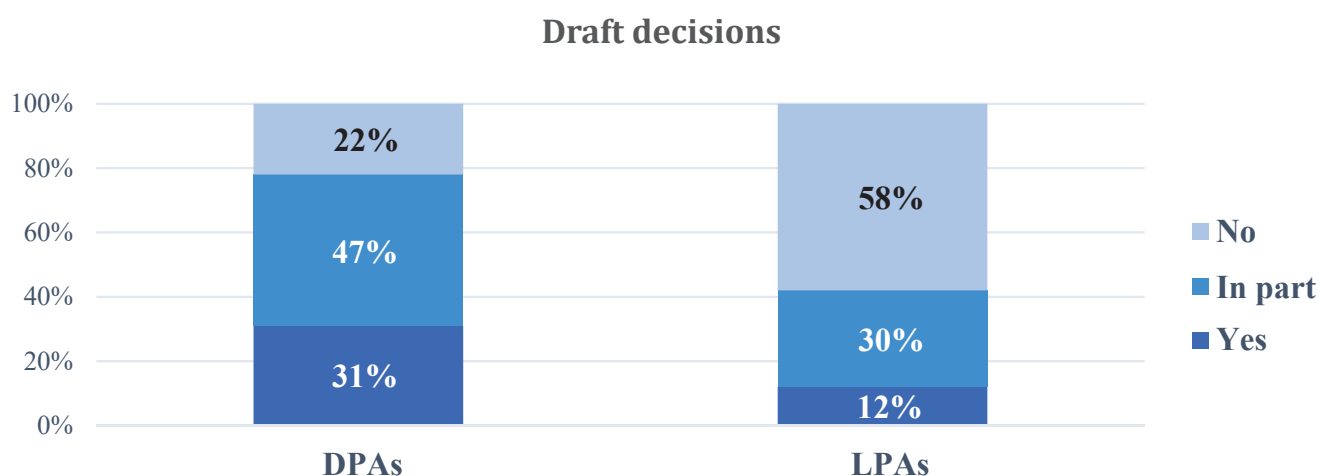


Diagram 3. Publishing the draft decisions of the District and Local Councils

In 2019, seven DPAs (22%) and 35 LPAs (58%) failed to bring the draft decisions and materials thereof to the attention of citizens prior to holding a meeting, and 15 DPAs (47%) and 18 LPAs (30%) partially informed the citizens on such documents. This fact hindered the right and possibility of citizens to get acquainted with the content of draft documents subject to discussion at the DPA or LPA meetings. Only ten DPAs (31%) and seven LPAs (12%) observed such requirements in full.

The access to draft decisions is important also from the perspective of citizens' participation in decision-making. The Law on transparency in decision-making no.239/2008 lays down binding requirements for the public authorities (Article 10) to ensure access to draft decisions and materials thereof by means of publishing them on the authority official website, granting access to the authority office, and by sending them through regular mail or through other available means upon the request of the interested party.

There are examples of good practices in terms of accessing the draft decisions developed by the Local Council are Soroca, Ceadir-Lunga and Strasenii towns, which have several browsers on their website

to search for the documents developed, considered and passed by the LPAs, including a browser to search for the draft decisions.

Under the performed review, an increasing attention was paid to the DPAs and LPAs compliance with the legislation on access to information. Based on the provisions of Law no.982/2000 on access to information, the natural and legal persons shall have the right to seek any information held by public authorities (information providers), save the exceptions expressly defined by the legislation, by submitting a written request, and public authorities shall have the obligation to provide such information as soon as it becomes available, but not later than 15 business days following the date of registration of information request (under certain circumstances the deadline may be prolonged with five more business days).

In this connection, IDIS “Viitorul” sent out questionnaires to the settlements subject to monitoring, having sought different types of public information. As a result, it received 19 questionnaires (59%) from the DPAs and 24 questionnaires (40%) from the LPAs.

Upon the initiative of IDIS “Viitorul”, a third party (natural person) submitted individual requests to local public authorities, seeking certain public information. In this manner, public authorities’ compliance with the obligation to provide responses to the requests for access to public information was checked. Subsequently, **16 districts (50%) and 27 towns and villages (45%) responded and provided the information sought.** At the same time, two LPAs refused to consider the requests as some of the latter did not bear any signature and, hence, did not meet the legal requirements. Although the aforementioned gaps were overcome and new flawless requests were submitted, the LPAs paid no attention to the new requests. One local public authority informed the applicant that it would respond 60 days later, having referred to the disposition issued by the Commission for Extraordinary Situations dated 18.03.2020, which prolonged the deadline for answering the petitions. However, the aforementioned LPA provided no response to that request. Another local public authority refused to consider the request on the ground that the natural person failed to write down where he/she worked, and one DPA refused to respond on the ground that it was not clear what position/status the natural person held (Note: such requirements are not covered by law). Respectively, overall, 16 DPAs and 33 LPAs did not provide the information sought by the natural person.

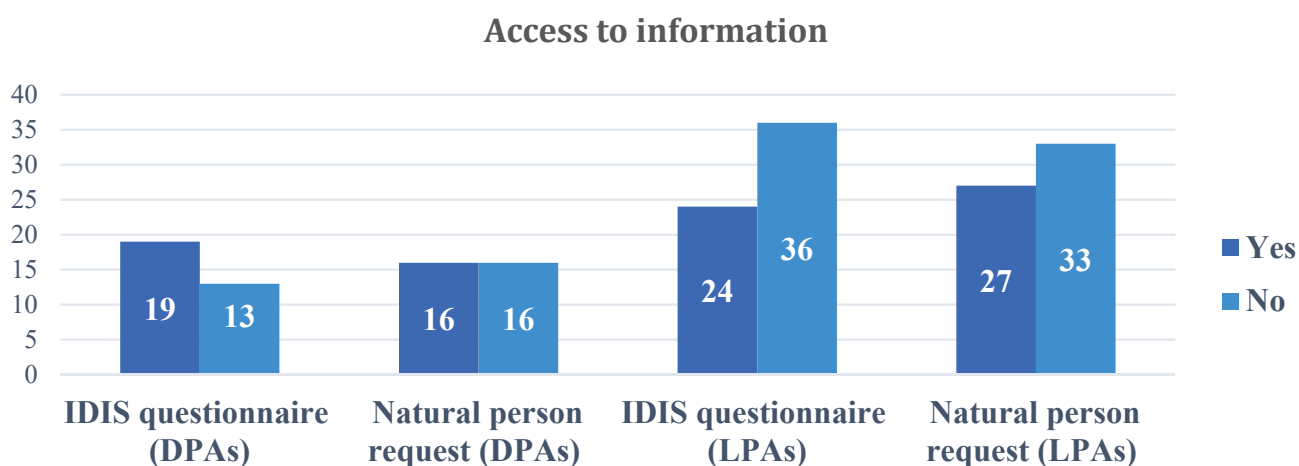


Diagram 4. DPAs and LPAs responses to the requests for providing public information

Regarding the refusal to fulfil the request submitted by a “mysterious complainant” on the grounds such as the job status and position, the Law on access to information covers just three requirements concerning a request for information (Article 12), namely that the written request shall include: a) sufficient and conclusive details for the identification of the requested information (or of parts thereof); b) the acceptable form in which the requested information may be received; c) identification data of the requesting party.

Concurrently, the Law (Article 10 (3)) stipulates that any person seeking access to information in accordance with the law is under no obligation to justify his/her interest for the requested information.

According to the Law, in case of being denied the access to information, the applicant shall have the option to get the information sought by having brought the case to courts. Recently, such practices have been often used, thus, revealing some serious gaps of the system. As a rule, the citizens and legal persons win such legal proceedings, but the litigation is longstanding, sometimes it may last a year, and, hence, the requested information would be no longer topical.

Against this background, it is necessary to address the issue of holding accountable the people (civil servants, local elected representatives) who have the obligation to provide public information sought by citizens and legal persons. Nowadays, one of the matters favouring the dishonest refusal of public authorities to provide information to the requesting parties stems from the insignificant sanctions imposed on the former by Article 71 of the Contravention Code (No.218/2008), as well as from the failure of natural and legal persons to use this legal instrument.

We are all aware of the rapid development of information technologies, including the matter of seeking and receiving public information. The Moldovan legislation enables the citizens to submit electronic requests for access to information, and, pursuant to the Administrative Code of the Republic of Moldova no.116/2018 (Article 73), the public authorities shall be obliged to grant the possibility to submit e-petitions through their official websites, while the complainant shall receive automatically the proof of registration.

In this context, we considered whether there was any online instrument on the LPAs websites, enabling the public to submit and track their complaints/requests. In this case, **16 DPAs (50%) and 30 LPAs (50%) provided for certain headings (forms to be filled online) on their websites allowing the submission of petitions/letters** to the settlement Mayor and to the district Chairperson. To this end, Ceadir-Lunga town developed a form to be filled online, allowing to submit requests and to view them, including the applicant's identity data, and other interactive information.

The use of such online instruments entails certain difficulties and reveals more gaps in the national regulatory framework.

According to the provisions of Law No.982/2000 on Access to Information (Article 12), official information and documents may be obtained by the requesting party on the basis of a written or verbal request. There are multiple ways for submitting a request: via a letter sent through regular mail, a written request lodged with the public authority registration office, via fax, e-mail, electronic means, etc. In fact, public authorities accept only the “classical” ways of request submission, and they rarely grant access to information requested by e-mail and electronic means. The reasons behind that stems from the understanding that the request for access to information is a petition, and it should meet certain

legal requirements, such as bearing the complainant signature, including the mobile signature for a petition submitted electronically.

Indeed, the Administrative Code (Articles 72, 75), as well as the former Law on Petitions (No.190/1994, Article 5), repealed on 1.04.2019, read that the electronic petition should meet the legal requirements defined for an electronic document, including the electronic signature. However, the request for access to information may not be put on the same footing as a simple petition due to several reasons.

Law no.982/2000 (which is a special law relative to the Law on Petitions no.190/1994/the Administrative Code of the Republic of Moldova no.116/2018) comprises no obligation to affix any electronic signature on a request for access to information.

The right on access to information may not be subject to perfunctory and unreasonable restrictions, as the formal and procedural requirements set by the legislation on petitioning/the Administrative Code could not be imposed on access to public information.

One of the three requirements comprised by Law no.982/2000 for providing the information sought is to state the applicant's identity data (accurate full name and address), which are important due to the sole reason that the applicant shall get the authority response.

The electronic signature is a method of authentication, confirming that the message or document is created by the person who signed it. The obvious signature affixed on a request/petition shall have the same purpose, i.e. to confirm that the person concerned submitted the document. However, a request in hard copy signed by the applicant and sent out via registered mail is by no means more secure than a request sent by e-mail or a form filled online. This is because the public authority is not able to identify if the signature belongs to the person who sought the information or to a different person. In this case, it should not matter and be mandatory for a public authority to find the truthfulness/authenticity of the person who requested the information.

Seeking information through e-mail and other similar means is considered to be a written request (Paragraph 23 of Judgement no.1 dated 02.04.2007 of the Supreme Court of Justice Plenary on considering the cases on access to official information).

All these obscurities and confusions shall be addressed by amending the legal framework with the aim to eliminate any confusion between the requests for access to information and petitions, including the situations when the requests for access to information are considered under the terms intended for petitions rather than under those meant for requests of information. The erroneous interpretation of requests for access to information to mandatorily bear an electronic signature when being submitted electronically shall be repealed as well.

3. Participation in decision-making

Pursuant to the “Rule of Law Index 2020”¹ developed by the World Justice Project, in terms of “Governance openness” the Republic of Moldova ranks the 48th out of 128 countries, scoring 0.55. Our country ranks the 57th in terms of “Right to information” and the 83rd in terms of “Civic participation”.

The monitoring of local public authorities focused on identifying the level of transparency in developing, adopting and publishing the regulatory acts, as well as citizens’ involvement in this process.

The outcomes show that 13 district authorities (41%) and 35 local authorities (58%) failed to conduct public consultations in 2019. Out of those public authorities that organised such consultations, 15 districts (47%) and 23 towns/villages (42%) conducted incomplete consultations for certain draft decisions, and only four districts (Straseni, Criuleni, Leova and Riscani) subjected all draft decisions considered by District Councils to public consultations.

Consultations, DPAs

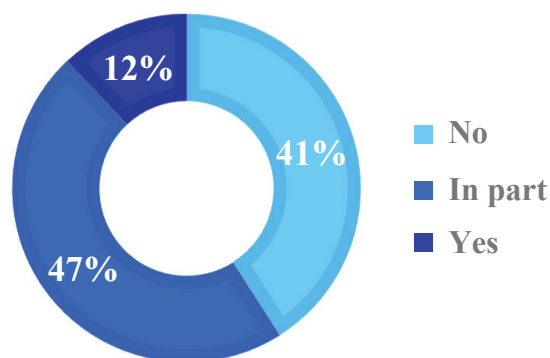


Diagram 5. Subjecting the draft decisions of District Councils to public consultations

Consultations, LPAs

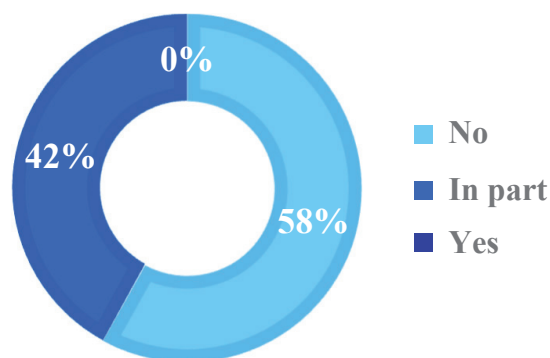


Diagram 6. Subjecting the draft decisions of Local Councils to public consultations

Concerning public consultations, we need to make more comments and clarifications based on monitoring findings, as well as building upon the provisions of Law no.239 on transparency in decision-making and of Government Decision no.967/2016 on public consultation mechanism with the civil society in decision-making.

Essentially, the fact of posting notices and draft decisions on the website represents a means of public consultation, as the opinions of civil society, experts, professional associations, academia are sought, and all these entities may submit written recommendations to the public authority. Certainly, in order for the process to be efficient and compliant with the legal framework, the DPAs and LPAs shall state in the notice of public consultations to be held such important information for the stakeholders like: the deadline for submitting the recommendations; how the stakeholders may submit or send their recommendations; the name and contact data (phone number, e-mail and mail addresses) of

¹ The Rule of Law Index 2020. Moldova.

people in charge for receiving and considering the recommendations concerning the draft decision subject to consultation; other relevant information. We shall stress that a series of notices and draft decisions have been posted on websites without having complied with the established timeframe (i.e. ten business days) to be granted for public consultations. This is an additional barrier hindering citizens' involvement in this process and submission of recommendations.

We have determined that the LPAs do not resort to public debates and public hearings, the latter being used mostly to consult the draft district/local budget. The public authorities have a wide array of methods for public consultation and active participation of citizens (covered by the national regulatory framework, as well as by the international best practices), e.g. workshops, seminars, conferences, deliberative fora (including online), joint working groups, general meetings, advisory groups/committees, focus-groups, citizens' groups, surveys, local referenda, etc.

Further, not all public authorities subject to monitoring use targeted information of stakeholders about the considered draft decisions, which may affect them. Targeted information of stakeholders can be carried out through different means, such as e-mail, social networks, electronic instruments, regular mail, including the development of a list of stakeholders and keeping it up-to-date. The LPAs shall identify such stakeholders and ensure their involvement in decision-making. By stakeholders we shall understand those people, groups of people, institutions, which are interested, affected, concerned or involved in a certain issue (stakeholders), the general public, experts, and non-governmental organisations. For example, in case of initiatives affecting the entrepreneurial activity, the LPAs must notify and consult the business associations, employers' and professional organisations, private sector representatives, other interested parties.

Setting permanent or *ad hoc* advisory working groups by the LPAs is an efficient kind of public consultation and involvement in decision-making. Such groups may embark on developing and considering the draft decisions. Following the conducted monitoring, we identified two DPAs (Cahul and Soroca) and one LPA (Comrat) that established such institutional co-operation and partnership mechanisms between the public authorities and the civil society.

Cahul District showed an interesting example, according to which a district body, namely the District Participating Council, was established in 2019 by Cahul District Council, involving the civil society in the process of initiating, developing, and approving decisions and public policy relating to Cahul District. It comprises representatives of several NGOs from Cahul District and brings to discussion specific topics, draft decisions included on the public authority agenda. Besides, it may submit recommendations aimed to improve those decisions.

Public participation, although essential in a democracy, is not that easy to implement. Quite often political will is required, as well as perseverance and a certain disposition to educate both the authorities and citizens regarding the responsibilities attributed to them in a democracy. Citizens' inactivity and poor civic participation are a common phenomenon throughout the country. This is not due to legislation (which allows and encourages public participation), but rather to the fact that people do not know the rights in their relations with public authorities, while a larger part of public authority staff members is not aware of their obligations to ensure citizens' involvement in decision-making.

The involvement of people in decision-making enhances the decision quality and applicability, and this is the case when such involvement is truly wanted and appraised by the administration.

When people's involvement is perfunctory, just to tick the box for legislative requirements or for simulating democratic principles and openness, it becomes a waste of time and money for both the administration and the citizens.

Following the conducted consultation, all the recommendations received shall be reviewed and summarised, showing how the opinions expressed by stakeholders have been integrated in decision-making. The recommendations shall be conveyed primarily to participants and to the community, which should be aware of the consultation objective.

Post-consultation summaries have a very important role to play, although they seem to be an insignificant component of public consultations. Such summaries may enhance confidence in the usefulness of participation process and in public administration. When lacking such documents, suspicion may occur in terms of "arrangements", "manipulations", as well as complaints of formalism, lack of interest in citizens' opinions. It does not make sense to involve people, unless their opinions, embodied in suggestions and comments, are taken into account when the decision is passed, although the final decision may not comprise them in full.

The monitoring outcomes show that **29 districts (91%) and 53 towns and villages (88%) failed to prepare a summary of recommendations received during the public consultation**. Only three DPAs and seven LPAs devised such summaries for some of the conducted public consultations. Several of those summaries were posted on the website and brought to the attention of citizens.

The DPAs and LPAs displayed some shortfalls in terms of preparing and making public the reports on transparency in decision-making. Only nine districts (Basarabeasca, Cahul, Cimislia, Criuleni, Falesti, Leova, Soldanesti, Stefan Voda and Strasenii) and three towns (Chisinau, Balti, and Codru) placed their 2019 Transparency Reports on the website.

Some districts and villages were identified in the course of monitoring to record the district/local council sittings and store them on the Web archive (websites and/or YouTube.com). Hence, 11 DPAs

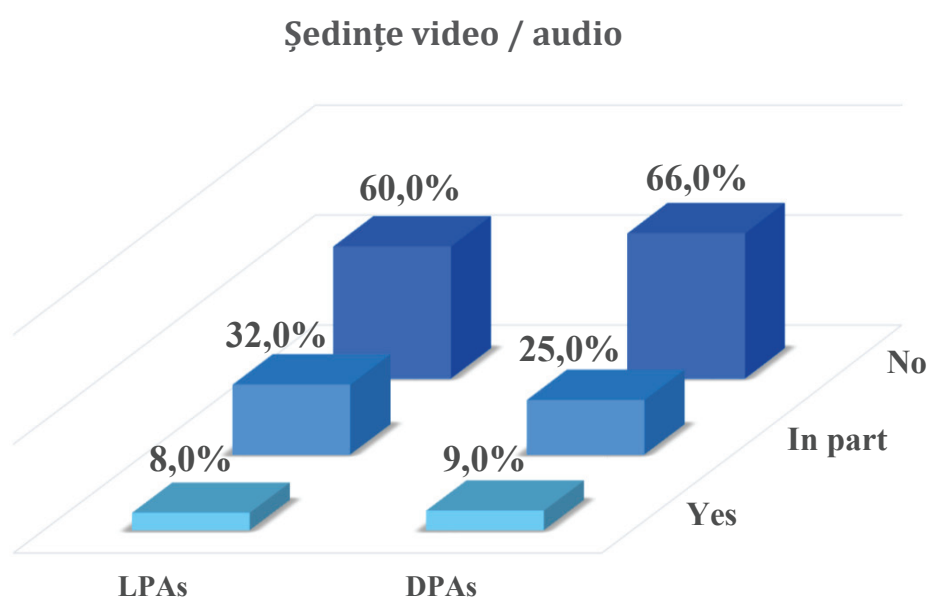


Diagram 7. Informing the citizens about the sittings held by the district/local council via video/audio instruments

(three in full and eight in part) and 24 LPAs (five in full and 19 in part) published the recorded video/audio in 2019. As a rule, those video/audio materials of district/local council sittings were recorded by local media/other people and posted on YouTube. In fact, few public authorities have technical possibilities and resources needed to record the sittings and post the video/audio materials on their website.

Regarding the publication of Local Council decisions, we shall mention the relatively high level of fulfilment of this obligation by the LPAs. The monitoring outcomes show that 29 districts (20 in full and nine in part) and 39 towns/villages (22 in full and 17 in part) informed the public about the adopted decisions in 2019. As of 28.10.2018, all DPAs/LPAs are required to publish their acts in the "State Register of Local Acts" (www.actelocale.gov.md). In this case, some local authorities indicate expressly on their websites the links to the passed decisions and published them on www.actelocale.gov.md to facilitate citizens' access and download the documents from the available space of official websites.

More and more authorities resort to social networks to involve citizens and disseminate public information. Hence, **29 districts and 44 towns and villages have official pages on Facebook, displaying notices and useful information for citizens.** Some of those pages need to be filled with more public information (Cantemir and Edinet districts, Ocnita town, Peresecina, Sipoteni, Gura Galbenei and Rusestii Noi villages).

4. Public procurement

Monitoring of public procurement transparency covered all phases of procurement, having reviewed whether the local public authorities brought to the knowledge of citizens the public procurement plans, procurement notices/calls, outcomes, including the awarded procurement contracts, as well as monitoring reports on contract performance.

As per the current provisions of the national regulatory framework in the area of public procurement, the contracting authorities have no obligation to publish all the aforementioned documents on their website, as most documents are displayed in the Public procurement Newsletter and on the Public Procurement Agency website. Moreover, following the implementation of the Automated Information System "State Register of Public Procurement" (MTender), a number of documents has been already published on that platform, which is accessible to the general public.

However, the need and importance of making public the LPAs documents as contracting authorities stem from the basic principles of public procurement referred to in the Law on public procurement (no.131/2015), such as transparency of procurement and the efficient spending of public money, minimising the contracting authorities' risks. So far, the MTender system is not operational in full. Moreover, it has no technical functionalities for carrying out all types of procurement procedures, being not used for public procurement of low value. Likewise, the browser does not enable to identify the public procurement procedures carried out by a certain contracting authority. There are also other difficulties (Note: as MTender is a multiple platform system, the two procurement platforms managed by private economic operators have browsers more accessible for the general public). In addition, as per Paragraph 15 (20¹) of the Regulation on official pages of public administration authorities on the Internet (Government Decision no.188/2012), the official website of the public administration authority

shall cover data on public procurement to include annual procurement plans, intention notices, results and other information of public interest relevant for the industry.

The monitoring outcomes show that some districts, towns and villages publish more documents on public procurement on their official website, even if they are not required to do so as per the legal provisions in force. As a simple way to inform the citizens about the initiated and unrolled public procurement, some of those settlements display the link to the documents published on MTender or in the Public Procurement Newsletter on their websites.

During the planning and initiating stages of procurement procedures, the DPAs have demonstrated openness, as 20 districts (63%) made public their procurement plans. As for the LPAs, only 17 of them (28%) published their annual procurement plans.

Further, we reviewed the awareness level concerning the tender notices and contract award notices. The monitoring covered not only the procurement carried out by public authorities through tender procedures and price quotations (the procedures used most often), but also the procurement of low value. In the latter case, public authorities are not required to publish such information on their websites. However, procurement of low value represents a significant share in the public authority overall procurement per year, while the lack of transparency may favour the occurrence of different rigged or fraud schemes in terms of procurement contracts. Starting from the fact that public procurement implies spending public money, and that the works, services and goods purchased are in the public interest, the procedures and outcomes of public procurement shall be as transparent as possible. Moreover, the Regulation on public procurement of low value, approved by Government Decision no.665/2016, explicitly sets out in paragraph 4 that in case of public procurement of low value, the contracting authority shall ensure efficient spending of financial means, transparency, objectivity and impartiality of procurement process and public trust towards it.

Based on the aforementioned clarifications, the monitoring outcomes show that **15 district authorities (47%) and 45 local authorities (75%) do not make public any tender notices relating to public procurement**. At the same time, 17 districts and 15 towns/villages reveal such information in part. In this case, more DPAs and LPAs published notices for tender procedures and price quotations held in 2019; however, they never published such notices on public procurement of low value or did that just partially.

Regarding the disclosure of contract awards, **20 districts (63%) and 52 towns/villages (87%) do not make public the outcomes of public procurement**. Only 11 DPAs and seven LPAs disclose such information in part. Falesti District and Balti Municipality are the best relevant examples to this end as they published all 2019 contract awards on their website.

Although this is not binding in the Republic of Moldova, it is necessary to publish the procurement contracts on the LPAs websites so that the general public has the possibility to monitor the contract performance. The monitoring outcomes show that **Straseni District, Cahul Municipality, Straseni Municipality, and Varnita village partially published the procurement contracts on the website** (at large, the procurement contracts of low value are missing). **Only the Mayoralty of Balti Municipality published all 2019 public procurement contracts on its website.**

Most of the considered websites (38%/12 districts and 75%/45 towns and villages) display no monitoring reports on the execution of procurement contracts and the annual statements on public

procurement of low value. The websites of 11 districts and ten towns/villages displayed at least one of the aforementioned documents, usually the monitoring reports on contract performance. At the same time, only nine districts and five towns/villages published both the monitoring reports on the execution of procurement contracts and the annual statements on public procurement of low value on their websites.

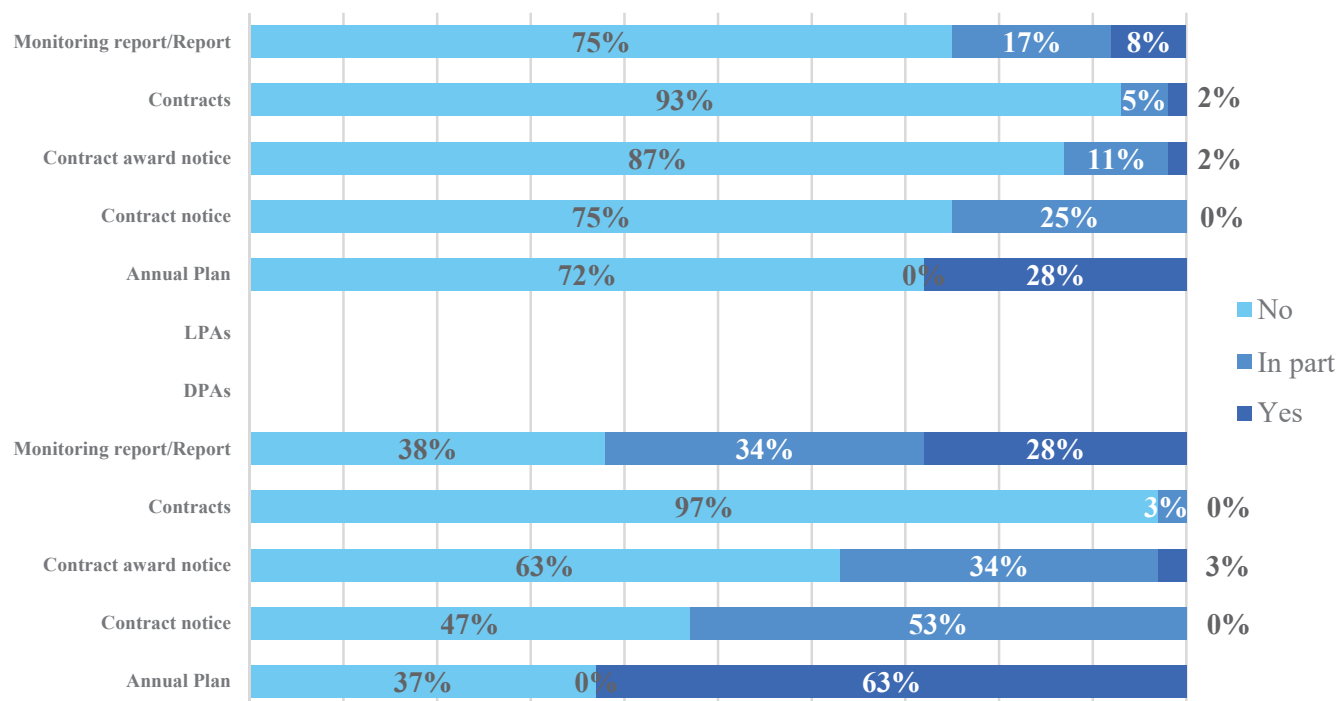


Diagram 8. Transparency of procurement phases carried out by DPAs and LPAs

With regards to monitoring reports on the execution of procurement contracts, according to paragraph 34 of the Regulation on the activity of public procurement working group, approved by Government Decision no.667/2016, they must include information regarding the performance stage of contractual obligations, the reasons for non-performance, the complaints submitted and sanctions applied, mentions on the contract performance quality, other information. In practice, the information comprised by such monitoring reports is perfunctory, as they display statistical data only with no information regarding any possible failure to perform the contractual obligations, the quality of contract performance, complaints submitted and sanctions imposed on economic operators. It is important to note that the national regulatory acts comprise no sanction for the failure to comply with those rules.

The contract performance, oversight and control are important phases of the public procurement cycle, especially in the context of efficient spending of public money. The monitoring responsibility is assigned to the working group, which has the task to check how the contracts are performed, whether the obligations assumed by the economic operator have been fulfilled, and the reasons behind non-performance, if any. In the event of non-performance of contractual obligations by an economic operator, the contracting authority may submit complaints, impose sanctions on the economic operator, as well as may require the Public Procurement Agency to include the economic operator

in the Banning list (banning its participation in public procurement for three years) pursuant to the Regulation on devising the banning list of economic operators (Government Decision no.1418/2016).

The contracting authorities make little or no use of the legal instruments they have to stop the breaches committed by economic operators during the contract performance, to make them accountable and hold liable for remedying non-compliances.

5. Administration of public assets

According to the current legislation, any sales/rental/lease of property owned by administrative and territorial units (ATUs) shall be carried out through public tender. This process implies several phases; however, only the publication of tender notices/calls and tender outcomes on the DPAs and LPAs websites was subject to monitoring in this report.

Against this background, **23 DPAs (72%) and 47 LPAs (78%) failed to publish any tender calls regarding the sales/rental/lease of ATUs assets, and 22 districts (69%) and 47 towns/villages (78%) did not disclose the tender outcomes.** Four districts (Falesti, Rezina, Soldanesti and Ungheni) and six towns/villages (Durlesti, Vulcanesti, Falesti, Leova and Telenesti towns and Talmazza village) organised no tenders for immovable property in 2019.

Two districts (Cimislia and Orhei) and three towns/villages (Ceadir-Lunga and Stefan Voda town and Carpineni village) imparted, to some extent, the information on tender calls, using directory boards to this end. Concurrently, five districts and six towns/villages imparted partially the information on tender outcomes.

Only Calarasi, Causeni and Straseni districts, Chisinau and Balti municipalities, Budesti and Costesti villages ensured the publication of all tender calls regarding the sales/rental/lease of immovable property, whilst Straseni District and Balti Municipality imparted all tender outcomes.

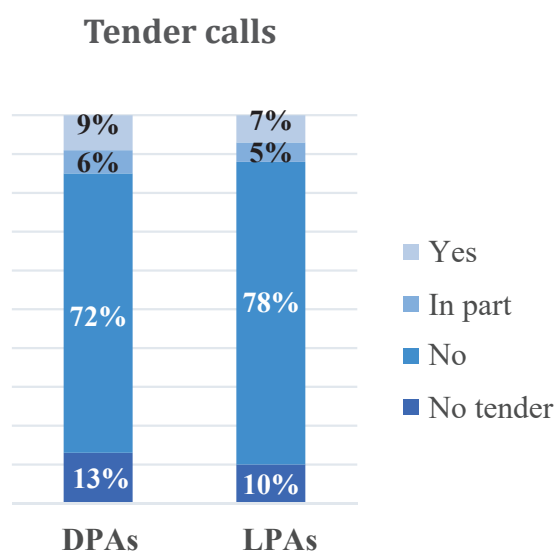


Diagram 9. Publishing the tender calls for real estate

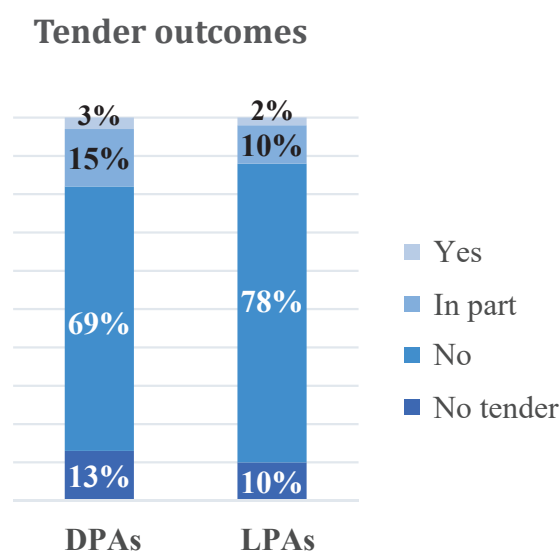


Diagram 10. Publishing the tender outcomes for real estate

The publication of tender notices and outcomes increases transparency and reduces certain risks, but this does not mean that no irregularities and corruption may occur in the administration of ATUs assets. This is one of the most vulnerable areas for LPAs. It stems from the increased interest in those assets, the confusing, contradictory, flawed and superficial legal framework, which allows for unfair interpretations, as well as from the lack of recordkeeping on that immovable property.

As per the 2020 alternative monitoring report concerning the implementation of the sectoral anti-corruption plan in the area of administration and transfer of public assets into private property, developed by “Urban Development Institute”², circa 40% of public assets, respectively, the ownership rights on them, lack appropriate inventory and entries into the Register of Immovable Property. Every year, the entities in charge identify thousands of new immovable property, which lack appropriate registration. Concurrently, there are no regulations aiming to properly monitor the assets transferred into economic management during the rent/lease/commodate period, while the conducted monitoring lacks adequate transparency.

6. Budgeting

The district and local budgets are essential for both the authorities and the citizens, whose quality of life and comfort are dependent on the budget planning and its execution decisions. Taking into account the importance of this document for the overall settlement development, as well as for every inhabitant, the process of budget development and execution shall be carried out in maximum transparency. Only through increased transparency the public funds would be spent effectively, and the level of corruption would be curbed.

As per the “Open Budget Index 2019”³, the Republic of Moldova scored 57 points out of 100 and ranked the 39th out of 117 countries in the World Budget Transparency. This shows that our country provided limited budget information. In terms of public participation in the budgetary process, the Republic of Moldova scored the worst, gathering only four points out of 100. This means that, practically, citizens are not entrusted to be involved in the budget development process.

The monitoring covered all phases of budget development and execution, having reviewed the level of DPAs and LPAs openness. Likewise, it focused on how the DPAs and LPAs ensured public participation in the process of budget planning and to what extent they brought the adopted budget and information about the spent public funds to the attention of citizens.

The outcomes show that **19 districts (59%) and 25 towns and villages (42%) made use of websites to subject the 2020 budget to public consultations and inform the public about the 2020 draft budget.** Concurrently, six DPAs and ten LPAs posted either the notice about holding public consultations or the draft budget on the website or posted the notice and/or the draft budget only on directory boards. Respectively, seven district authorities (22%) and 25 LPAs (42%) failed to comply with the legal obligation to subject the draft budget to public consultations.

2 The 2020 alternative Monitoring Report concerning the implementation of the Sectoral Anti-corruption Plan in the area of administration and transfer of public assets into private property.

3 Open Budget Survey 2019. Moldova.

Likewise, it is worth noting that not all 2020 draft budgets subject to public consultations covered a description of all components (programmes, sub-programmes and other budget components), including a brief justification for each component in the revenues and expenditures parts. Only 17 DPAs (53%) and 14 LPAs (23%) made public an explanatory note to the draft budget, comprising structured and clear information concerning the revenues and expenditures of the developed budget. This moment is important from the perspective of facilitating the understanding of draft budget data and ensuring direct involvement of citizens in public consultations.

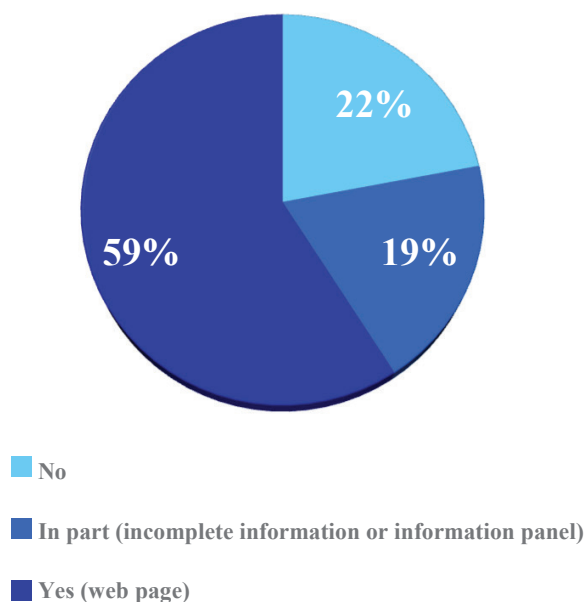


Diagram 11. Subjecting the draft decisions of District Councils to public consultations

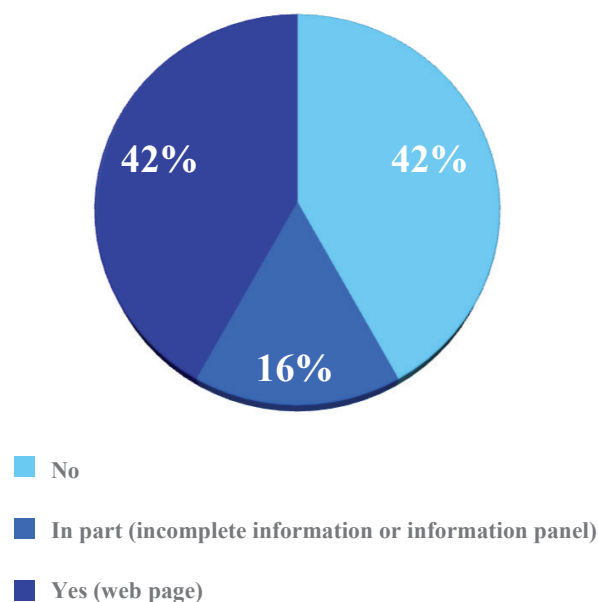


Diagram 12. Subjecting the draft decisions of Local Councils to public consultations

More and more ATUs tend to publish their annual budgets on websites. Hence, **25 DPAs (78%) and 34 LPAs (57%) made public their 2020 budget.**

A new indicator relating to participatory budgeting (PB) has been included in the current assessment. To this end, we considered whether the DPAs and LPAs websites displayed the projects submitted by citizens under the PB and the selected successful projects.

Currently, the results are modest as only Balti Municipality, Ialoveni town and Budesti village published such information, whilst Calarasi town posted incomplete information. Moreover, none of the district councils' websites mentioned any data on PB.

Participatory budgeting represents an important exercise aiming to involve in the settlement development decisions those citizens, who come up with specific proposals and ideas for the benefit of the community, while the LPAs secure the implementation of those projects by allocating financial resources from the local budgets. The participatory budgeting is primarily a communication and dialogue process among the community inhabitants, who vote for the best project. Concurrently, it is a dialogue between citizens and LPAs relating to the budget process, resources, possibilities and priorities of public authorities, other important matters of their work, as well as an instrument through which LPAs shall involve, listen to and take into consideration citizens' opinions.

7. Human resources

Professional promotion and human resources development policy served as basis for the DPAs in recruiting and hiring their staff members in a transparent manner and based on competition.

The monitoring carried out in this area focused primarily on the level of access to information ensured by the district and local authorities in terms of selecting and hiring staff in public service. In this case, the Regulation on filling public positions through competition, approved by Government Decision no.201/2009 provides for the obligation to publish on the public authority website (and directory board) a notice displaying the information about the competition to be carried out (Paragraph 7), the list of candidates admitted to compete (Paragraph 17), the competition outcomes (Paragraph 43), as well as other relevant information about the competitions held to fill public functions.

Following the conducted review we have found that **ten DPAs (33%) and 35 LPAs (58%) do not publish the current vacancies in the public service on the website**, including the vacancy job description and qualification requirements set for the candidates to fill the vacancies (two settlements held no competition to fill public functions). This obligation was fulfilled by 13 DPAs (41%) and 18 LPAs (30%). Few public authorities published some notices on the website or used just the directory board to inform about the current vacancies (Basarabeasca, Dubasari, Floresti, Glodeni, Leova, Singerei, Telenesti and Ungheni districts and Soroca, Calarasi, Briceni, Anenii Noi, and Stefan Voda towns).

So far, 24 district authorities (75%) and 49 local authorities (82%) have not published the selection/hiring outcomes on the websites. We shall also stress here that two settlements failed to conduct competitions aimed to fill public functions, while in one settlement no candidate applied for participating in the competition. The results of hiring are communicated in part or through the directory board by seven districts and seven towns/villages.

Only Straseni District and Balti Municipality published all competition outcomes held in 2019 to fill public functions on their websites.

Competition to fill the vacancies

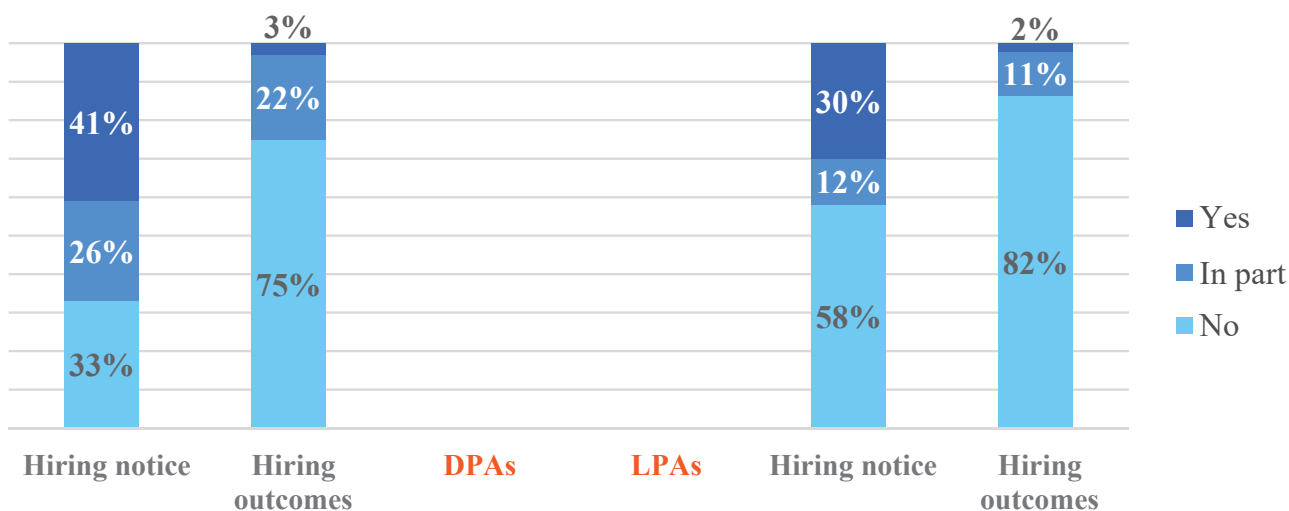


Diagram 13. Transparency of competitions held to fill the vacancies in DPAs and LPAs

8. Professional ethics and conflicts of interests

The national legal framework was supplemented and improved during 2016 – 2018, being boosted also by the approval of the National Integrity and Anti-corruption Strategy for 2017 – 2020 and of the Action Plans for the Strategy pillars (Parliament Decision no.56/2017). Amongst the regulatory acts enacted during the aforementioned timeframe one should mention Law no.132/2016 on the National Integrity Authority, Law no.133/2016 on the Declaration of wealth and personal interests, Law no.82/2017 on integrity and Law no.122/2018 on whistleblowers.

Recently, the Government enacted its Decision no.23/2020 approving the Regulation on in-house examination and reporting procedures for the disclosure of illegal practices (which repealed Government Decision no.707/2013 approving the framework Regulation on whistleblowers), as well as Decision no.116/2020 on the legal regime for gifts (which repealed Government Decision no.134/2013 on setting the permitted value of symbolic gifts, of those offered out of politeness or on the occasion of certain protocol actions and approving the Regulation of recordkeeping, evaluation, safe-keeping, use and redemption of symbolic gifts, of those offered out of politeness or on the occasion of certain protocol actions).

Hence, the national public authorities and public operators are also responsible for undertaking a series of measures aimed to ensure institutional integrity (non-admission, denunciation of corruption events and protection of whistleblowers, observing the rules of ethics and conduct, observing the regime of conflicts of interests, the regime of gifts, etc). In this connection, the authorities shall have regulations in place or other information concerning the disclosure of corruption deeds, procedures for confidential receipt, recording and examination of internal disclosures for offensive practices and integrity warnings, record keeping books (for tracking gifts, risks, etc.), other integrity instruments.

The conducted review shows that **21 DPAs (66%) and 57 LPAs (95%) failed to publish the Code of Ethics for their employees on the website**. Only ten districts (Basarabeasca, Cahul, Cantemir, Cimislia, Criuleni, Leova, Orhei, Riscani, Singerei, and Straseni) and two towns (Straseni and Glodeni) published such Codes of Ethics on their websites. Concurrently, one district (Soroca) published the Civil Servant's Code of Conduct on the website enacted through Law no.25/2008, and a municipality (Chisinau) published its Ethics Code for a specific category of civil servant (internal auditors), being appraised as a partial fulfilment of legal obligations.

We have ascertained that DPAs and LPAs have gaps in terms of developing and publishing Codes of Ethics for local elected representatives. Such Codes of Ethics shall comprise rules of conduct and responsibilities set for councillors, mayors, deputy mayors, district chairpersons and deputy chairpersons. **None of the towns/villages subject to monitoring published any Code of ethics for local elected representatives, while only the District Councils of Cahul and Riscani published such Codes on their websites.**

Based on the provisions or regulatory acts, the district public authorities are responsible to approve the District Anti-corruption and Integrity Plans for 2018 – 2020, as well as the semestrial monitoring reports on the implementation of actions covered by those plans.

The monitoring outcomes show that **18 districts (56%) failed to make public and publish the District Anti-corruption and Integrity Plans and the 2019 Monitoring Reports on Plan Implementation on their websites**. Incomplete information was made public by 11 DPAs. They

published either the District Anti-corruption and Integrity Plans (seven districts) or the Monitoring Reports on Plan Implementation (three districts), or published the Plan and a semestrial Monitoring Report (one district). Only the district councils of Leova, Singerei and Basarabeasca published both the plans and semestrial monitoring reports for 2019.

As for the LPAs, we monitored the availability of plans, strategies, guidelines/handbooks, other documents aimed to ensure integrity. In this connection, **56 towns and villages (93%) failed to develop and publish documents aimed to ensure integrity**. Only four ATUs developed and published some integrity toolkits. Balti Municipality published on the website the Local Strategic Anti-corruption and Integrity Action Plan of Balti Mayoralty, the Report on the implementation of the Local Anti-corruption Plan of Balti Municipality during 2019, as well as the List of gifts and their beneficiaries for 2018-2019, the composition of the Commission for keeping record on and evaluation of gifts. Cimislia and Ialoveni Town Halls published the Local Strategic Anti-corruption Action Plan, and Varnita village made public the Regulation on whistleblowers and the composition of the Commission for keeping records on gifts.

The analysis of websites highlights the lack of mechanisms to report any non-ethical conduct and corruption events within the public authorities. Thus, **26 districts (81%) and 57 towns/villages (95%) failed to make public any mechanisms for reporting corruption events**. Out of the District ATUs that have such mechanisms, Telenesti, Straseni, Riscani, Glodeni and Falesti districts established an anti-corruption hot-line, while Orhei District has a form available online to report such issues. As for the LPAs, Chisinau Municipality established an anti-corruption hot-line, Larga village has a form available online to report such issues, and Balti Municipality uses both instruments (hot-line and online form).

Ethics, DPAs

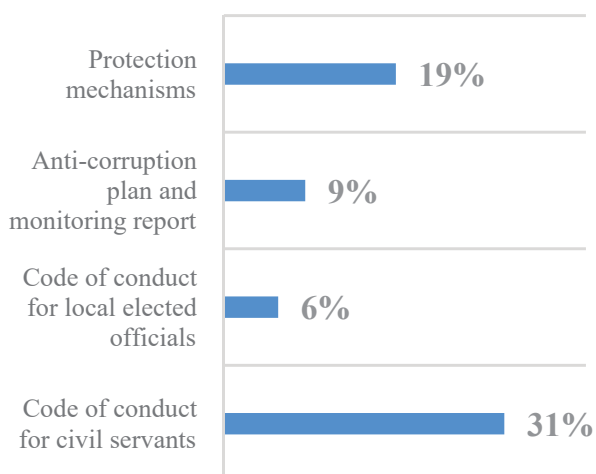


Diagram 14. Anti-corruption instruments

Ethics, LPAs

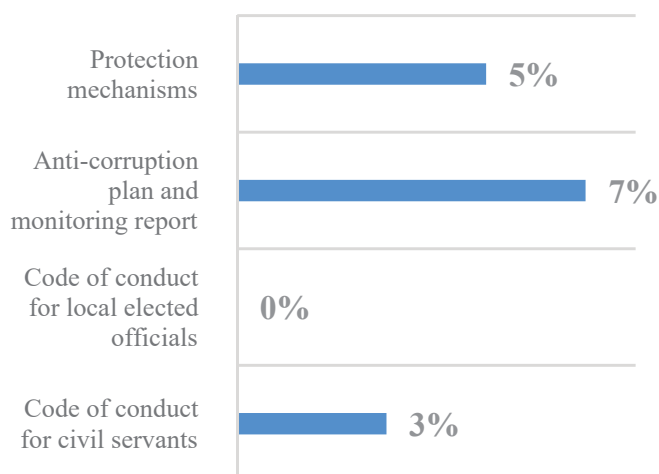


Diagram 15. Anti-corruption instruments at the local level

9. Social services

The monitoring of social services was focused on the openness of information for vulnerable people/families regarding the types of social services available within the ATU, the manner of applying for and accessing such services by a potential beneficiary.

A large number of DPAs (13/41%) and LPAs (31/52%) made public no information about the available social services. As many as 12 districts and 23 towns/villages managed to communicate such information in part. Only seven district authorities and six local authorities made public such information, having listed the beneficiaries, described the services and the way how the socially-vulnerable people/families may apply for such services.

Some districts resorted to a good practice by creating separate websites for the Social Welfare Divisions within the District Councils and posting relevant information for the beneficiaries of such social services (Falesti, Sorocea and Ungheni districts).

The authorities of 21 districts (66%) failed to disclose the number of beneficiaries of social aid and allowances for the cold period of the year, as well as the amounts paid. Nonetheless, four DPAs and the district councils of Criuleni, Basarabeasca, Falesti, Leova, Orhei, Singerei and Straseni made public on their websites the number of beneficiaries and the amounts paid.

10. Investments, municipal-owned enterprises and commercial companies' equity participation

The monitoring covered the review of work transparency and the results derived from the implementation of assistance projects, having the DPAs and LPAs as beneficiaries or contractors.

As per Government Decision no.188/2012 on official websites of public authorities on Internet (Paragraph 15 (13)), the public authorities shall publish on their official websites the data about any programmes and projects, technical assistance inclusive, having them as beneficiaries or contractors (name, core objectives and tasks, the main programme beneficiaries and contractors, the deadlines and expected outcomes, the funding amount and sources).

The conducted review shows that few LPAs make public on their website the required data on programmes and projects, including all technical assistance projects. Only seven DPAs (three in full and four in part) and 11 LPAs (two in full and nine in part) published the information about the assistance projects on their websites.

However, **25 districts (78%) and 49 towns/villages (82%) publish no information about the work carried out and the outcomes achieved following the implementation of assistance projects.** These results may be caused also by the scattered information about the implemented projects under several headings available on websites or social networks; hence, it is difficult to track down such information. In this connection, in order to facilitate citizens' access to information it is necessary to create special headings on websites to be supplemented and updated with data on programmes and projects, including the technical assistance projects.

Moreover, we monitored the level of DPAs and LPAs openness in terms of corporate governance of municipal-owned enterprises and commercial companies in which the majority stake belongs to ATUs. As per Law no.246/2017 on state/municipal-owned enterprises (Article 18), the undertaking annual statement (covering annual financial reviews) must be posted on the official website of the undertaking and on the founder's official website.

As a result, **30 districts (94%) and 55 towns and villages (92%) publish no annual financial reviews of municipal-owned enterprises and commercial companies in which the majority stake belongs to ATUs on their websites.** Some incomplete information has been published by two towns. Likewise, Straseni District and Falesti town have published all annual financial reviews of the aforementioned entities. It is worth stressing that three ATUs subject to monitoring (a district, a town and a village) do not have any municipal-owned enterprises and commercial companies in which the majority stake belongs to them.

III. General conclusions

1. The overall average value in terms of transparency achieved by 32 districts and 60 towns and villages subject to monitoring displays a non-homogeneous picture. On the one hand, the district public authorities, with an average value of 37.67%, show some growth in comparison with the previous Transparency rankings. Even so, the developments are insignificant when compared to the 2018 ranking. On the other hand, the LPAs with an overall average value of 24.03% depict a downward trend relative to the last two rankings, excelling the overall average of the first Ranking. The reasons behind such a state of affairs are unknown; however, one should keep in mind that Parliamentary and local general elections took place in 2019, and many political events and changes occurred, which could adversely affect the work of LPAs throughout the country.
2. While all 32 DPAs subject to monitoring have official websites, ten towns and villages have no websites intended to mirror their work and raise public awareness on public matters or their websites are non-operational. In the absence of websites or their non-use, the transparency of LPAs activity declines. As for the existing websites, not all of them display the binding information covered by the national regulatory framework. Besides, many websites are not user-friendly for an ordinary citizen, who would hardly find the information of interest for him/her. The difficulties in creating, administering and updating a website at the local level are caused by the lack of funds and shortage of personnel. As a rule, the administration, placement and update of site information on a constant basis means an additional effort overlapping the regular duties of a LPA employee, especially in the context of lacking personnel and abundance of vacancies, lack of attractiveness of public jobs at the local level, insufficient financial incentives to fill such job positions.
3. The Republic of Moldova has got the legal framework necessary to enable citizens' access to public information and their involvement in decision-making. Although the rules may be improved, the biggest issue is the serious failure to implement these legal requirements at the local level.
4. Pretty often, the LPAs refuse to respond and provide public information requested by natural or legal persons pursuant to the provisions of the Law on Access to Information. Hence, 40% of DPAs and 60% of LPAs subject to monitoring failed to respond to the questionnaire circulated by IDIS "Viitorul", which can be deemed as request of information. Concurrently, a natural person sent out a request demanding certain public information, and 50% of districts and 55% of towns and villages failed to respond to it. In most cases, the request remained unanswered, although there were cases when unsubstantiated grounds were invoked in their refusal, such as: the information comprised personal data, state secret or other reasons. When being denied access to information, the applicants may resort to courts, and the number of actions brought to courts is on increase. Nonetheless, such situations reveal the flaws/shortcomings in the efficient use of the Law on access to information, as well as the Contravention Code in terms of sanctioning the inflicting refusal to provide the applicant with the requested data or when supplying him/her with erroneous information.
5. A topical subject relates to the requests of information in electronic format. Quite often, the public authorities refuse to provide the requested info by email and digital instruments on the ground that

the request for access to information is a petition, which is subject to certain legal requirements, namely to include the Petitioner's signature, to affix the mobile/digital signature when submitting an electronic petition. On the one hand, this statement is construed erroneously and suitable for the public authorities, which treat a request for access to information as a petition, while, on the other hand, the national regulatory framework fails to provide a clear statement to this end. What is certain is that the right for access to information shall not be subjected to perfunctory and unsubstantiated restrictions applied by public authorities.

6. Compliance with transparency requirements while developing and adopting decisions at the DPAs and LPAs level and citizens' involvement in this process is pretty low. Circa 40% of DPAs and circa 60% of LPAs failed to organise any public consultations in 2019. The public has no access to draft decisions; notices on organising public consultations are not made public, the minimum 10-day period set up for conducting public consultations is not complied with. When such legal requirements are observed, the LPAs focused mainly on raising people's awareness, leaving public consultation and participation aside. There are also shortcomings in citizens' involvement in decision-making by local public authorities, as the stakeholders are neither identified nor informed about the draft decisions subject to consideration, which may affect them. Also, no working groups or advisory boards are created by the LPAs to get involved in devising and considering the draft decisions.
7. The legal framework in the area of public procurement provides for scattered publication of procurement related documents in different sources and Web portals, save the procurement contracts, tender notices and award of procurement contracts of low value. At the same time, the MTender System is not operational in full. Moreover, it has no technical functionalities for carrying out all types of procurement procedures, being not used for public procurement procedures of low value. Likewise, the browser does not enable to identify the public procurement procedures carried out by a certain contracting authority, and many other difficulties. All these matters generate practices that lack uniformity. The DPAs and LPAs fail to publish any information about conducting public procurement procedures and their outcomes. At the same time, there are some positive practices as well, which need to be followed and taken up by other public authorities. Such positive practices include making public procurement contracts (Balti municipality), which are partially followed by Cahul and Straseni municipalities, Varnita village and Straseni district.
8. The local public authorities do not post tender notices on sales/rental/lease of ATUs assets on their website and fail to make public the tender outcomes. The notices are published by 72% of districts/78% of towns and villages, while the outcomes are made public by 69% of districts/78% of towns and villages. The lack of transparency in terms of public property management is augmented by the large number of assets, which have never been subject to proper inventory and entry into the State Register of Immovable Property, as well as the absence of regulations to ensure appropriate monitoring of assents transferred into economic management.
9. To a large extent, public authorities subject the district and local draft budget to consultations or, at least, they publish notices on organising public consultations and/or the draft budget. However, this should not suffice for ensuring public involvement and participation in the budgetary process. The participation level is declining as citizens' understanding of budget figures is neither envisaged nor facilitated. Moreover, public involvement in the budgetary process at the end of the calendar year, i.e. at the time of adopting it by district and local councils lack both efficiency and effectiveness as

little changes could be brought to or affected at that particular stage in comparison with the budget planning phases when citizens' recommendations may have a sound impact.

10. Although the national regulatory framework covers binding provisions for Public Authorities to publish a series of information regarding the recruiting process for filling the existing public service vacancies on their websites, these are not complied with by all settlements subject to monitoring. The information on vacancies is not published on their websites by 33% of districts and 58% of towns and villages, while the selection/recruiting outcomes are not published by 75% of district authorities and 82% of local authorities.
11. The local public authorities failed to implement the measures aiming to ensure institutional integrity. No regulations or other information on denouncing any corruptions acts, procedures on receiving, recording and considering under confidentiality any internal disclosures of illegal practices made by whistleblowers, books to keep records on gifts, risks, etc. are never published on websites. At the same time, more public authorities mentioned in their answers to the received requests seeking access to information that they lacked integrity instruments. This statement has been certified also by the monitoring outcomes, which show that 93% of towns and villages failed to publish any documents to secure integrity matters. Moreover, 56% of districts never published on websites and made public the District Anti-corruption and Integrity Plans, the 2019 monitoring reports on Plan implementation.
12. The LPAs do not bring the adopted social assistance programmes to the attention of citizens or any information about the social services rendered by the ATU and how a potential beneficiary may apply for such services. The monitoring results show that 41% of DPAs and 52% of LPAs made public no information on the available social services.
13. Most DPAs and LPAs do not post any information about the work done and accomplishments following the implementation of assistance projects (78% of districts and 82% in towns and villages). Such results may be influenced also by the scattered data about the implemented projects posted under different headings of websites or social networks, which makes it difficult to track them down.
14. It has been determined a low level of openness of Public Authorities in terms of publishing any annual financial reviews of municipal-owned enterprises and commercial companies in which the majority stake belongs to ATUs. Although the Law on state and municipal-owned enterprises stipulates a binding provision to post those financial reviews on the founder's website, the monitoring outcomes show that 94% of districts and 92% of towns and villages subject to monitoring do not comply with this legal requirement.
15. Amongst other material findings laid down following the assessment of Moldovan local governments' transparency, we can mention:
 - 16% of DPA and 38% LPA websites have no headings devoted to decision-making transparency;
 - Circa 13% of district authorities and 38% of local authorities do not publish any notices about public sittings to be held;
 - 22% of DPAs and 58% of LPAs failed to make public the draft decisions and materials thereto;
 - 91% of districts and 88% of towns and villages prepared no summaries on the recommendations received following the organised public consultations;

- 9% of districts and 35% of towns and villages did not make public the decisions adopted by District and Local Councils;
- 91% of DPAs and 73% of local authorities have got official pages on Facebook where they post notices and useful information for citizens;
- 37% of DPAs and 72% of LPAs do not publish their yearly public procurement plans;
- 47% of DPAs and 75% of LPAs failed to make public the tender notices on public procurement;
- 63% of districts and 87% of towns/villages do not impart the procurement outcomes;
- Websites of 38% of DPA and 75% of LPA comprise no monitoring reports on procurement contracts performance and annual statements on procurement of low value;
- 22% of districts and 42% of towns and villages failed to subject the 2020 draft budget to public consultations and make it public;
- Only 53% of district authorities and 23% of local authorities brought to the public attention a draft budget explanatory note, comprising well-structured information about budget revenues and expenditures;
- 78% of DPAs and 57% of LPAs made public the 2020 budget;
- Only Balti Municipality, Ialoveni town, Budesti village and Calarasi town, to some extent, published information about participatory budgeting (projects submitted by citizens and the selected successful projects);
- 66% of DPAs and 95% of LPAs failed to publish a Code of Ethics for their employees on the website;
- No town/village subject to monitoring has published a Code of Ethics for the local elected representatives; concurrently, only Cahul and Riscani districts managed to publish such Codes on their websites;
- 81% of districts and 95% of towns/villages failed to make public any mechanisms for reporting corruption deeds;
- 66% of DPAs failed to make public the number of beneficiaries of social aid and allowances for the cold period of the year and the amounts paid to this end.

IV. Recommendations

Based on the findings stemming from monitoring transparency of district and local public administration authorities, drawn was a series of recommendations with the view of boosting the level of transparency of DPAs and LPAs. The recommendations are touching on a number of public entities. Similarly, once again, reiterated were a number of previous, though still valid, recommendations outlined in the earlier reports addressed to local public authorities.

1. It is expedient to amend the Law on access to information as well as the Administrative Code of the Republic of Moldova in order to exclude any confusion that might arise between the requests for access to information and the petitions/complaints filed. This should exclude cases of considering requests on gaining access to information during the timeframe provided by law for considering the petitions/complaints. Moreover, this should serve to prevent erroneous interpretation of requests for access to information requiring mandatory application of electronic signature when filing such by e-mail.
2. It is necessary to establish rather viable toolkits for monitoring and control of proper implementation of the legal provisions having regard to transparency of decision-making and Government Decision on the mechanism of public consultation with civil society in decision-making by district, local and central public administration officials. The State Chancellery, through its local offices, could make use of administrative control instruments to empower the district and local public administration authorities failing to meet their obligations of maintaining transparency in decision-making.
3. There is a pressing need of amending the legislation with the view of providing for detailed regulation for the mechanism of personal accountability of officials, including the local elected ones, for breaching legal provisions and non-compliance with the applicable transparency requirements.

District and Local Public Authorities (as per domains of transparency)

Access to information

4. It is worth reiterating the importance and the need of maintaining websites, while permanently supplementing and updating such since these are intended for the district and local public authorities while offering a rather effective tool for dissemination of public information. In this regard, it is necessary to take the following actions:
 - identify the financial resources available with the state, district and local budgets, projects, donor grants, etc. in order to create and maintain websites at the level of district and local administrations (the most optimal and correct solution would be acting through the actual financial decentralisation);
 - upgrade the existing websites to facilitate access to navigation and analysis of public information;
 - provide for regular training of staff members responsible for raising citizens awareness on public information;

- identify viable ways of outsourcing web portal maintenance services, publishing and updating the information;
 - supplement websites with all types of information provided by the national regulatory acts.
5. The local public authorities should set up and supplement decision-making transparency sections on websites in order to facilitate stakeholders' access to information on decision-making and approval process.
 6. The web portals maintained by the local public authorities should offer a possibility of filing online petitions and requests for access to information addressed to the management of any authority in compliance with the petitioning procedure established by the effective legislation and the requirements set out in the Law on access to information.
 7. The websites shall contain complete information on the business hours of public authorities and their subdivisions, specifying the days and hours of audience of the officials responsible for providing information and official documents.
 8. The public must be kept informed in advance on the next meeting scheduled by the public authorities and be informed on the agenda and topics to be discussed. The notice on holding public sittings should be made in accordance with the time limits set by law (No later than 10 (ten) days prior to holding an ordinary meeting and not less than 3 (three) days prior to holding an extraordinary meeting of the District Council. In case of Local Council, it should not be later than 5 (five) working days before ordinary meetings and not less than 3 (three) days before an extraordinary meeting). Mandatorily specified should be the date, time, and venue of the meeting as well as the agenda.
 9. So as not to limit the rights and the possibility of familiarising the citizens with the content of draft decisions and materials thereof discussed during the meetings of district and local public administration authorities, these should be made public by using modern electronic information publicity tools.
 10. It is of paramount importance that the local public authorities comply with the provisions of the Law on access to information, respond to inquiries and provide information requested by natural and legal persons, media and other stakeholders.

Transparency of decision-making

11. Any draft decision that could produce social, economic or environmental impact (on the lifestyles and human rights, culture, health and social protection as well as on the local communities and public services) should mandatory undergo the procedure of public consultations. To that end, it is important to place the notice on launching such process on the respective website.
12. Public authorities should keep track of all stakeholders recommendations received during public consultation on draft decisions and include such in the summary of recommendations to be made public through general information prior to passing the respective decision.
13. It is appropriate to establish and strengthen the platforms and mechanisms at district and local level for continuous and effective cooperation and partnership between district and local public

administration authorities and the civil society. The most effective types of the like platforms' world be the working groups and advisory councils mandatory participating in the decision-making process.

14. Local public administration authorities should approve and mandatorily notify the public on the internal rules of information, counselling and participation in the process of decisions drafting and adoption bearing on legal provisions contained in the regulations governing the transparency of decision-making.
15. Each public authority should designate and train its focal point for public consultation responsible for ensuring transparency of decision-making within the respective authority. The name and contact details of the focal point for public consultation in the decision-making process should appear on the official website of the local public authority.
16. Local public administration authorities should prepare and make public their reports decision-making transparency, having regard to public information.
17. The local public administration authorities should, at all times, ensure citizens' access to the meetings of the Local Council and its standing committees.
18. A modern tool to increase transparency of district and local public authorities' performance includes video/audio recording of district and local council meetings while the websites ensure for archive record storage.
19. Public information should be made available throughout the entire decision-making process, including publication of decisions taken by district and local public authorities. This is important for highlighting the extent of taking into consideration the proposals and recommendations made by citizens, non-governmental organisations and by other stakeholders.

Public procurement

20. Arising from the principle of transparency of public procurement, efficient use of public money and curtailing risks that the contracting authorities could encounter, it is also important to follow the requirements set forth by the national regulatory framework. Likewise, it is necessary and important to make accessible the documents having regard to public procurement. To that end, the local public authorities should ensure placement of the following documents on the website or providing a link to the documents published on MTender, Public Procurement Newsletter and on the website maintained by the Public Procurement Agency:
 - annual public procurement plans (Notices of intent);
 - tender notices, including such for low-value procurements;
 - public procurement award notices, including such for low-value procurements;
 - monitoring reports on the execution of public procurement contracts and annual statements on low-value public procurements.
21. Although not mandatory in the Republic of Moldova, still it is desirable to publish procurement contracts on the website maintained by the local public authorities, so that the general public could monitor their execution. At the same time, it is important for the public to be able to find promptly

a particular contract on the website being guided by a number of criteria, such as the date of contract signing, the name of business operator, the contract value, the type of products, services, works, etc.

Administration of public property

- 22.** In order to enhance transparency of public property administration, the local authorities should publish on their website's information having regard to the assets owned and managed (lands and real estate). Also published should be any other relevant information on sales or on the third-party assets' management, such as notices of holding property sales/rental/lease tenders by ATUs and information on tender outcomes.

Budgeting

- 23.** The draft district and local budgets should undergo public consultations while publishing a notice on holding public consultations along with the draft budget, explanatory note, description and justification of all revenue and expenditure items contained in the budget. To ensure full public participation in the budgeting process and obtain useful recommendations, both district and local public authorities shall bear the responsibility for holding public consultations throughout the year and at all stages of budget planning.
- 24.** Maximum transparency must be provided during budget adoption and execution while making sure the budget and its execution reports are duly placed on the website.
- 25.** The public authorities should contribute efforts in finding effective tools to engage citizens in making decisions on the development of local communities, i.e. in the process of participatory budgeting. To ensure utmost transparency of this process, placed on the websites maintained by local public authorities should be the projects submitted by citizens within the frameworks of participatory budgeting as well as the selected successful projects.

Human resources

- 26.** Local public administrations should take care of ensuring public access to information having regard to selection and recruitment of civil servants. To that end, placed on the websites should be the following information:
- The existing vacant civil service positions, including the job description for the vacant positions and qualification requirements for the potential candidates;
 - The number and name of candidates who participated in the selection competition for taking the vacant positions;
 - The results of selection competitions supplemented with information on the evaluation of candidates by the Selection Panel and the scoring awarded to all applicants.

Ethics and conflict of interests

- 27.** In order to prevent any conflict of interests, acts of corruption and to establish certain standards, it is necessary to draft and publish the Ethics Code for civil servants and the Code of Conduct for local elected representatives. These should contain provisions on such issues as bribery, conflict

of interest, acceptance of gifts, other risks and procedures to follow in each case by the responsible persons.

28. In order to strengthen the institutional integrity, the local public authorities should have regulations and other information regarding disclosure of corruption deeds, procedures for confidential receipt, recording and examination of internal disclosures for offensive practices and integrity warnings, record keeping books (for tracking gifts, risks, etc.), other integrity instruments provided for by the national regulatory framework.
29. The local public authorities should have in stock and make the public familiar with the tools for reporting any unethical behaviour and corruption within the public authority (telephone line, online forms, etc.). To provide for the effectiveness of the reporting tools, every public authority should have available the procedures and guarantees protecting the whistleblowers of the acts of corruption.
30. District public authorities shall bear responsibility for making public familiar with the district anti-corruption and integrity plans as well as to prepare and publish monitoring reports (biannually) on the implementation of the actions outlined in those plans.

Social services

31. Local public authorities must inform and ensure access of socially-vulnerable persons/families to all types of available social services and welfare institutions. In this regard, made publicly available on websites should be all of the adopted social assistance programmes, information on social services provided by the territorial-administrative unit and on the application procedure to be followed by the potential beneficiaries.

Investments, municipal-owned enterprises and commercial companies' equity participation

32. Local public authorities are obliged to ensure transparency of all of the assistance programmes and projects for which the LPAs are acting as beneficiaries or contractors. This information should be placed on the websites maintained by the authorities, under special headings, so as to facilitate public access to the activities and results obtained following the implementation of assistance projects.
33. The local public authorities should focus their efforts on ensuring transparency and professionalism of corporate governance within the municipal-owned enterprises and commercial companies in which the majority stake belongs to the territorial-administrative unit. Hence, the annual financial reviews of all of herewith-mentioned enterprises should be placed on the websites maintained by the public authorities (enterprise founders), so that the public is duly informed on the performance indicators of those undertakings, profits and losses and other indicators of the activity performed by the latter.

V. Transparency ranking

1. Ranking of settlements

| RANKING | SETTLEMENT | I. Access to information | II. Participation in decision-making | III. Public procurement | IV. Administration of public property | V. Budgeting | VI. Human resources | VII. Professional ethics and conflict of interest | VIII. Social services | IX. Investments, moes, and equity participation | TOTAL | CLASS |
|---------|------------|--------------------------|--------------------------------------|-------------------------|---------------------------------------|--------------|---------------------|---|-----------------------|---|-------|-------|
| 1 | Balti | 94% | 63% | 93% | 86% | 96% | 100% | 50% | 100% | 0% | 76 | A |
| 2 | Chisinau | 61% | 66% | 43% | 70% | 79% | 40% | 25% | 50% | 33% | 58 | B– |
| 3 | Falesti | 94% | 48% | 48% | 50% | 75% | 50% | 0% | 38% | 50% | 56 | B– |
| 4 | Straseni | 77% | 58% | 41% | 14% | 58% | 50% | 33% | 38% | 33% | 52 | C+ |
| 5 | Orhei | 69% | 56% | 36% | 36% | 83% | 60% | 0% | 38% | 0% | 50 | C+ |
| 6 | Calarasi | 82% | 57% | 29% | 0% | 75% | 40% | 0% | 38% | 0% | 50 | C |
| 7 | Telenesti | 86% | 50% | 29% | 0% | 58% | 0% | 17% | 38% | 0% | 47 | C |
| 8 | Varnita | 79% | 50% | 35% | 21% | 67% | 30% | 33% | 0% | 17% | 47 | C |
| 9 | Cimislia | 97% | 42% | 20% | 14% | 67% | 20% | 25% | 100% | 0% | 47 | C |
| 10 | Rezina | 72% | 44% | 48% | 0% | 83% | 20% | 0% | 0% | 0% | 43 | C– |
| 11 | Glodeni | 58% | 49% | 0% | 7% | 83% | 0% | 33% | 50% | 0% | 39 | D+ |
| 12 | Cricova | 76% | 31% | 44% | 14% | 67% | 0% | 17% | 38% | 0% | 39 | D+ |
| 13 | Cahul | 41% | 41% | 37% | 0% | 75% | 0% | 17% | 75% | 17% | 38 | D+ |
| 14 | Truseni | 58% | 46% | 0% | 0% | 75% | 50% | 0% | 38% | 0% | 37 | D+ |
| 15 | Carpineni | 84% | 43% | 16% | 6% | 21% | 30% | 0% | 63% | 0% | 36 | D+ |
| 16 | Ocnita | 76% | 31% | 13% | 29% | 33% | 0% | 0% | 38% | 50% | 34 | D |
| 17 | Soroca | 44% | 31% | 29% | 0% | 83% | 10% | 0% | 50% | 0% | 33 | D |
| 18 | Magdacesti | 51% | 26% | 0% | 0% | 83% | 20% | 17% | 75% | 0% | 31 | D |
| 19 | Leova | 66% | 36% | 16% | 25% | 25% | 30% | 17% | 0% | 0% | 31 | D |
| 20 | Durlesti | 63% | 35% | 0% | 0% | 29% | 10% | 0% | 38% | 0% | 29 | D– |
| 21 | Ialoveni | 53% | 32% | 0% | 0% | 58% | 0% | 33% | 0% | 17% | 29 | D– |
| 22 | Anenii Noi | 54% | 35% | 0% | 21% | 25% | 40% | 0% | 38% | 0% | 28 | D– |
| 23 | Singerei | 58% | 22% | 28% | 0% | 67% | 0% | 0% | 0% | 0% | 28 | D– |

| | | | | | | | | | | | | |
|----|-----------------------|-----|-----|-----|-----|-----|-----|-----|------|-----|----|----|
| 24 | Peresecina | 53% | 28% | 0% | 7% | 42% | 0% | 17% | 38% | 0% | 28 | D– |
| 25 | Ceadir – Lunga | 28% | 19% | 20% | 29% | 58% | 20% | 17% | 38% | 17% | 26 | D– |
| 26 | Talmază | 70% | 30% | 0% | 0% | 13% | 0% | 0% | 63% | 0% | 26 | D– |
| 27 | Edinet | 50% | 22% | 0% | 0% | 58% | 20% | 17% | 38% | 0% | 26 | D– |
| 28 | Comrat | 44% | 35% | 0% | 0% | 38% | 20% | 0% | 13% | 0% | 24 | E+ |
| 29 | Budești | 17% | 23% | 20% | 29% | 38% | 20% | 17% | 13% | 17% | 23 | E+ |
| 30 | Costești | 39% | 14% | 0% | 29% | 42% | 0% | 17% | 25% | 33% | 22 | E+ |
| 31 | Căușeni | 26% | 20% | 0% | 0% | 50% | 20% | 17% | 38% | 0% | 20 | E+ |
| 32 | Copceac | 45% | 28% | 0% | 0% | 8% | 20% | 17% | 0% | 0% | 19 | E |
| 33 | Riscani | 25% | 12% | 17% | 14% | 46% | 0% | 17% | 38% | 0% | 19 | E |
| 34 | Stefan Voda | 14% | 25% | 17% | 14% | 33% | 10% | 0% | 0% | 0% | 18 | E |
| 35 | Nisporeni | 34% | 17% | 0% | 0% | 42% | 0% | 0% | 0% | 0% | 16 | E |
| 36 | Donduseni | 28% | 25% | 0% | 21% | 0% | 30% | 0% | 0% | 0% | 16 | E |
| 37 | Zaim | 21% | 14% | 0% | 0% | 21% | 0% | 8% | 75% | 17% | 15 | E– |
| 37 | Congaz | 17% | 19% | 0% | 0% | 50% | 0% | 0% | 0% | 0% | 15 | E– |
| 39 | Vulcanesti | 13% | 25% | 0% | 0% | 33% | 0% | 0% | 0% | 0% | 14 | E– |
| 39 | Pelinia | 6% | 28% | 0% | 0% | 0% | 0% | 0% | 100% | 0% | 14 | E– |
| 41 | Băcioi | 34% | 12% | 0% | 0% | 17% | 0% | 17% | 0% | 0% | 12 | E– |
| 42 | Sîngera | 6% | 16% | 0% | 21% | 29% | 0% | 17% | 0% | 0% | 12 | E– |
| 43 | Codru | 34% | 9% | 0% | 0% | 17% | 0% | 17% | 0% | 0% | 12 | E– |
| 44 | Florești | 20% | 9% | 17% | 0% | 17% | 20% | 0% | 0% | 0% | 11 | E– |
| 45 | Taraclia | 18% | 13% | 0% | 0% | 17% | 0% | 0% | 38% | 0% | 10 | E– |
| 46 | Hîncești | 34% | 9% | 0% | 0% | 0% | 0% | 17% | 0% | 0% | 10 | F |
| 47 | Basarabasca | 9% | 16% | 0% | 0% | 0% | 0% | 8% | 50% | 0% | 9 | F |
| 47 | Corjeuți | 50% | 3% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 9 | F |
| 49 | Larga | 12% | 9% | 0% | 0% | 0% | 0% | 33% | 38% | 0% | 8 | F |
| 50 | Drochia | 15% | 13% | 3% | 0% | 0% | 0% | 17% | 0% | 0% | 8 | F |
| 51 | Ungheni | 16% | 13% | 0% | 0% | 0% | 0% | 0% | 0% | 17% | 8 | F |
| 52 | Cupcini | 6% | 9% | 0% | 0% | 17% | 0% | 17% | 0% | 0% | 7 | F |
| 52 | Baurci | 25% | 9% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 7 | F |
| 54 | Briceni | 9% | 3% | 0% | 0% | 8% | 10% | 0% | 13% | 33% | 7 | F |
| 55 | Otaci | 25% | 3% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 5 | F |
| 56 | Ruseștii Noi | 0% | 9% | 0% | 0% | 13% | 0% | 0% | 0% | 0% | 5 | F |
| 57 | Criuleni | 0% | 9% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 3 | F |
| 58 | Gura Galbenei | 0% | 6% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 2 | F |
| 58 | Sîpoteni | 0% | 6% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 2 | F |
| 60 | Chiscăreni | 0% | 3% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 1 | F |

2. Ranking of districts

| RANKING | DISTRICT | I. Access to information | II. Participation in decision-making | III. Public procurement | IV. Administration of public property | V. Budgeting | VI. Human resources | VII. Professional ethics and conflict of interest | VIII. Social services | IX. Investments, moes, and equity participation | TOTAL | CLASS |
|---------|-------------|--------------------------|--------------------------------------|-------------------------|---------------------------------------|--------------|---------------------|---|-----------------------|---|-------|-------|
| 1 | Straseni | 88% | 77% | 73% | 100% | 75% | 100% | 42% | 100% | 50% | 78 | A |
| 2 | Falesti | 59% | 56% | 67% | 100% | 75% | 60% | 42% | 100% | 33% | 61 | B |
| 3 | Criuleni | 91% | 73% | 33% | 21% | 75% | 30% | 25% | 50% | 25% | 60 | B– |
| 4 | Cahul | 52% | 76% | 48% | 50% | 58% | 50% | 33% | 25% | 33% | 57 | B– |
| 5 | Soroca | 86% | 65% | 46% | 29% | 58% | 50% | 8% | 88% | 0% | 56 | B– |
| 6 | Leova | 88% | 53% | 58% | 29% | 75% | 10% | 50% | 50% | 17% | 56 | B– |
| 7 | Singerei | 94% | 44% | 58% | 50% | 75% | 10% | 33% | 63% | 17% | 55 | C+ |
| 8 | Cimislia | 64% | 54% | 29% | 64% | 83% | 50% | 25% | 50% | 17% | 53 | C+ |
| 9 | Riscani | 86% | 40% | 29% | 29% | 58% | 20% | 75% | 25% | 17% | 47 | C |
| 10 | Orhei | 64% | 43% | 58% | 43% | 75% | 0% | 25% | 25% | 17% | 46 | C |
| 11 | Dubasari | 94% | 51% | 0% | 0% | 83% | 20% | 17% | 38% | 17% | 46 | C |
| 12 | Stefan Voda | 93% | 44% | 45% | 0% | 75% | 20% | 8% | 0% | 17% | 46 | C |
| 13 | Ungheni | 88% | 38% | 8% | 100% | 46% | 20% | 25% | 75% | 50% | 45 | C |
| 14 | Rezina | 50% | 41% | 42% | 100% | 83% | 20% | 17% | 0% | 0% | 42 | C– |
| 15 | Soldanesti | 60% | 41% | 38% | 0% | 46% | 30% | 8% | 25% | 0% | 37 | D+ |
| 16 | Basarabasca | 68% | 22% | 39% | 0% | 42% | 10% | 33% | 100% | 33% | 36 | D+ |
| 17 | Floresti | 86% | 31% | 13% | 29% | 33% | 20% | 8% | 25% | 0% | 34 | D |
| 18 | Donduseni | 51% | 39% | 25% | 0% | 38% | 50% | 25% | 13% | 0% | 33 | D |
| 19 | Hincesti | 66% | 23% | 0% | 29% | 67% | 0% | 17% | 0% | 50% | 32 | D |
| 20 | Causeni | 28% | 22% | 30% | 57% | 79% | 20% | 17% | 0% | 17% | 32 | D |
| 21 | Edinet | 58% | 23% | 38% | 29% | 42% | 10% | 0% | 25% | 17% | 31 | D |
| 22 | Cantemir | 42% | 38% | 13% | 50% | 13% | 30% | 25% | 50% | 0% | 30 | D |
| 23 | Drochia | 43% | 16% | 46% | 29% | 33% | 0% | 17% | 0% | 0% | 24 | E+ |
| 24 | Ialoveni | 33% | 22% | 0% | 29% | 58% | 20% | 17% | 25% | 0% | 24 | E+ |
| 25 | Anenii Noi | 38% | 34% | 0% | 0% | 50% | 0% | 0% | 25% | 0% | 24 | E+ |
| 26 | Telenesti | 26% | 22% | 33% | 0% | 33% | 10% | 17% | 75% | 0% | 24 | E+ |
| 27 | Glodeni | 32% | 27% | 3% | 0% | 58% | 10% | 33% | 0% | 0% | 24 | E+ |
| 28 | Calarasi | 47% | 25% | 20% | 29% | 17% | 20% | 0% | 0% | 0% | 23 | E+ |
| 29 | Nisporeni | 41% | 12% | 25% | 0% | 17% | 0% | 0% | 0% | 0% | 15 | E |
| 30 | Ocnita | 16% | 19% | 0% | 0% | 29% | 0% | 17% | 0% | 0% | 13 | E– |
| 31 | Taraclia | 12% | 16% | 17% | 29% | 13% | 0% | 8% | 0% | 0% | 13 | E– |
| 32 | Briceni | 13% | 22% | 13% | 29% | 0% | 0% | 0% | 0% | 0% | 13 | E– |

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