



**INTEGRITY PLAN FOR
THE IMPLEMENTATION OF THE NATIONAL ANTI-CORRUPTION STRATEGY 2021-2025**

**APPROVED
GENERAL MANAGER,**

ȚUȚU Gabriel

GENERAL OBJECTIVE 1 <i>INCREASING THE DEGREE OF IMPLEMENTATION OF INTEGRITY MEASURES AT THE ORGANIZATIONAL LEVEL</i>								
Specific objective 1.1	Implementation of integrity measures at the level of C.N. ROMARM S.A.							
Crt. no.	Measure	Performance Indicators	Verification Sources	Risks	Responsible	Resources	Term	Observations
1.1.1	Adopting and distributing within the institution a statement on the assumption of an organizational integrity agenda;	1. Adopted Statement; 2. Distributed Statement	1. Statement signed and submitted to the SNA Technical Secretariat; 2. C.N. ROMARM S.A. website;	Adopting a statement not adapted to the institutional context;	1. CORP CONTROL AND ANTI-CORRUPTION SERVICE prepares; 2. C.N. ROMARM S.A. – the head of the institution approves; 3. SNA coordinator at the C.N. ROMARM S.A.	No additional financial implications .	March 2022	Mandatory measure according to HG no. 1269/2021; Measure taken – by the statement of C.N. ROMARM S.A. no.



					level distributes/posts on the website			628/18.02.202 2
1.1.2	Enactment and distribution within the institution of the integrity plan, following consultation with employees and risk assessment according to GD No. 1269/2021, and ensuring the resources necessary for its implementation ;	1. Integrity plan adopted; 2. Persons designated to monitor the implementation of the integrity plan	1. Decision of the General Manager of C.N. ROMARM S.A. approving the integrity plan and appointing the strategy coordinator; 2. C.N. ROMARM S.A. website;	-Exclusively formal nature of the consultation; - Failure to allocate the necessary human resources	1. CORP CONTROL AND ANTI-CORRUPTION SERVICE prepares the Integrity Plan and sends it to specialized structures for proposals 2. C.N. ROMARM S.A. – the head of the institution approves; 3. CORP CONTROL AND ANTI-CORRUPTION SERVICE submits the approved Integrity Plan to be posted on the website;	No additional financial implications .	June 2022	Mandatory measure according to HG no. 1269/2021;
1.1.3	Annual evaluation of the implementation of the plan and	1. No. of newly emerging risks and vulnerabilities;	1. Risk and vulnerability assessment report prepared; 2. C.N.	- Formal nature of the approach in the absence of effective	1. C.N. ROMARM S.A. - CORP CONTROL AND ANTICORRUPTION SERVICE	No additional financial implications	Annual	Mandatory measure according to HG no. 1269/2021;



	its adaptation to newly emerging risks and vulnerabilities;	2. Modified Integrity Plan	ROMARM S.A. website;	application of the risk assessment methodology	prepares, based on the data and information communicated by the specialized structures of C.N. ROMARM S.A. and by the Monitoring Commission of the internal managerial control system; 2. The institution's management approves.			
1.1.4	Identification, analysis, evaluation and monitoring of corruption risks, as well as the establishment and implementation of measures to prevent and control them, according to	1. Corruption Risk Register completed: - No. of identified risks and vulnerabilities; - No. of intervention measures; 2. No. of meetings of the Working Group for the	Risk assessment report, as well as prevention and control measures developed; Minutes of the Working Group meeting	- Formal nature of the approach in the absence of effective application of the risk assessment methodology	1. C.N. ROMARM S.A. - Working group	No additional financial implications	Annual	Mandatory measure according to HG no. 1269/2021;



	HG no. 599/2018;	effective application of the risk assessment methodology						
1.1.5	Identification, evaluation and unitary reporting of integrity incidents, according to HG no. 599/2018, as well as the establishment of prevention and/or control measures following their occurrence;	1. Prepared report: - No. of identified incidents; - No. and type of preventive measures taken	1. C.N. ROMARM S.A. website	-Misidentification of facts as integrity incidents; - Lack of relevance of data resulting from misclassification of facts as integrity incidents	1. C.N. ROMARM S.A. – the integrity advisor transmits to the CORP CONTROL AND ANTI-CORRUPTION SERVICE;	No additional financial implications	Annual	Mandatory measure according to HG no. 1269/2021;
1.1.6	Submitting contributions requested by the technical secretariat and participating in the	1.Participation in cooperation platform meetings; 2. Submitting the report on the implementation of the measures	1. Minutes; 2. Report sent to the technical secretariat; 3.Correspondence addresses;	-Incomplete or late data transmission; -Failure to allocate necessary human	1. C.N. ROMARM S.A./CORP CONTROL AND ANTI-CORRUPTION SERVICE	No additional financial implications	Permanent	Mandatory measure according to HG no. 1269/2021;



	coordination and monitoring activities of the strategy;	provided for in the strategy, accompanied by the annexes completed following the full collection of indicators; 3.Participa-tion in thematic evaluation missions		resources				
1.1.7	Intensifying the use of the new SNA portal to increase the level of public information about the monitoring of the SNA implementation , new trends and developments in the field of integrity	1. Data sets uploaded by C.N. ROMARM S.A. in order to increase the level of public information about the monitoring of the implementatio n of the SNA; 2. No. of portal accesses	1. C.N. ROMARM S.A. website	- Poor functioning of the portal; - Uneven reporting	1. C.N. ROMARM S.A./CORP CONTROL AND ANTI-CORRUPTION SERVICE;	No additional financial implications	Perman-ent	Mandatory measure according to HG no. 1269/2021;



GENERAL OBJECTIVE 2 <i>REDUCING THE IMPACT OF CORRUPTION ON CITIZENS</i>								
Crt. no.	Measure	Performance indicators	Verification sources	Risks	Responsible	Resources	Term	Observations
2.1	Strengthening professionalism in the careers of public sector personnel, including through the effective application of performance evaluation mechanisms, avoiding temporary appointments to public management positions, making recruitment procedures in the public sector transparent and ensuring the stability of public office;	1. No. and type of measures ordered following the evaluations carried out; 2. No. of management positions occupied on a permanent basis; 3. Percentage of management positions occupied on a permanent basis in relation to the total number of management positions in the institution; 4. Type of	1. C.N. ROMARM S.A. website; 2. Centralized situation	- failure to allocate the necessary human and financial resources	1. Management of C.N. ROMARM S.A.;	Human resources;	Permanent	Mandatory measure according to HG no. 1269/2021;



		measures taken to ensure the visibility of announcements related to recruitment procedures						
2.2	Forming a civic culture of confronting the phenomenon of "petty" corruption, including through the use of new technologies (e.g. social media)	1. No. and type of used channels; 2. Nr. materiale educative/informative; 3. No. of preventive messages (posts) published on institutional online communication channels (Facebook)	1. C.N. ROMARM S.A. website; 2. Facebook page of C.N. ROMARM S.A.	- lack of a centralized automated platform for analyzing social media information relevant to C.N. ROMARM S.A.; - Lack of specialized staff dedicated to managing the platform; - lack of a budget item in the budget of C.N. ROMARM S.A. which provides for information/advertising expenses	1. C.N. ROMARM S.A./CORP CONTROL AND ANTI-CORRUPTION SERVICE;	Human resources	2021-2025	Mandatory measure according to HG no. 1269/2021;



GENERAL OBJECTIVE 3								
CONSOLIDATING INSTITUTIONAL MANAGEMENT AND ADMINISTRATIVE CAPACITY TO PREVENT AND FIGHT CORRUPTION								
Specific objective 3.1	Making preventive anti-corruption measures more efficient by remedying legislative gaps and inconsistencies, as well as by ensuring their effective implementation							
Crt. no.	Measure	Performance indicators	Verification sources	Risks	Responsabil	Resources	Term	Observations
3.1.1	Ensuring by C.N. ROMARM S.A. the effective and uniform application of the legislation transposing EU Directive 2019/1937 in subordinate structures	1. Development/updating the Procedure for reporting irregularities and protecting persons who complain or report irregularities; 2. No. of administrative measures adopted to eliminate the causes or circumstances that favored the violation of the rules, differentiated by typology; 3. No. of workplace retaliation situations; 4. No. of complaints filed in court	Procedure for reporting irregularities and protection of persons who complain or report irregularities at the level of C.N. ROMARM S.A.; Decisions of the management of C.N. ROMARM S.A. relating to the administrative measures	- failure to allocate the necessary human and financial resources	1. C.N. ROMARM S.A.- management of the institution; 2. C.N. ROMARM S.A. - CORP CONTROL AND ANTI-CORRUPTION SERVICE;	Human	Perma- nent	Mandatory measure according to HG no. 1269/2021;



			adopted to eliminate the causes or circumstances that favored the violation of the rules					
Specific objective 3.3	Improving the capacity to manage management failure by correlating tools that have an impact on the early identification of institutional risks and vulnerabilities							
3.3.1	Internal audit, once every two years, of the corruption prevention system at the level of C.N. ROMARM S.A.	1. No. of made recommendations; 2. Degree of implementation of recommendations made; 3. Degree of implementation of corruption prevention measures, according to the approved internal public audit report	Audit report;	- Failure to allocate necessary human resources	C.N. ROMARM S.A. - API	No additional financial implications	Cyclical (2 years)	Mandatory measure according to HG no. 1269/2021



GENERAL OBJECTIVE 4

Specific objective 4.1	Increasing integrity, reducing vulnerabilities and corruption risks in the public health system							
Crt. no.	Measure	Performance indicators	Verification sources	Risks	Responsabil	Resources	Term	Observations
4.1.1	Strengthening the mechanism for prioritizing budget allocations and evaluating the appropriateness of decisions of C.N. ROMARM S.A. and its subsidiaries regarding the use of public funds according to specific methodologies;	1. Strengthened investment prioritization mechanism; 2. Staff employed and strengthened mechanism;	1. C.N. ROMARM S.A. website and its branches.	- Failure to allocate the necessary human and financial resources	1. Management of C.N. ROMARM S.A. and its branches.	Budget of C.N. ROMARM S.A. and its branches	2023	Mandatory measure for ME and C.N. ROMARM S.A. according to HG no. 1269/2021;
4.1.2	Supplementing and strengthening the control and	1. Amendment to the organization and functioning regulations of	1. Website of C.N. ROMARM S.A. and its	- Failure to allocate the necessary human and financial	1. Management of C.N. ROMARM S.A. and its	Budget of C.N. ROMARM S.A. and its	2022	Mandatory measure for C.N. ROMARM



	integrity structures of C.N. ROMARM S.A and its branches.	C.N. ROMARM S.A and its branches; 2. No. of partnerships established with national and international institutions specialized in preventing fraud and corruption in healthcare (eg. EHFCN)	branches.	resources	branches	branches.		S.A. and its branches, according to HG no. 1269/2021.
4.1.3	Establishment at the level of C.N. ROMARM S.A. and its branches of a common mechanism for monitoring and controlling providers in the social health insurance system;	1. Order of the Minister of Economy and the General Manager of C.N. ROMARM S.A. for defining the monitoring and control methodology within the framework of joint control actions for providers in the	1. Website of C.N. ROMARM S.A and its branches.	-Neadoptarea actului normativ; -Deficitul de resurse umane la nivelul C.N. ROMARM S.A.	2. Management of C.N. ROMARM S.A.	Budget of C.N. ROMARM S.A and its branches.	2022	Mandatory measure for C.N. ROMARM S.A. and its branches, according to HG no. 1269/2021.



		social health insurance system; 2. Number of controls carried out by each institution						
4.1.4	Carrying out continuous methodological guidance activities on topics regarding transparency, ethics and integrity dedicated to staff in C.N. ROMARM S.A.	1. Number and type of organized activities; 2. Target group feedback.	Approved activities; Participants lists	- Failure to allocate the necessary human and financial resources; - Lack of interest from the target group	1. Management of C.N. ROMARM S.A and its branches.	Human and financial resources	Permanent	Mandatory measure according to HG no. 1269/2021
Specific objective 4.5	Increasing integrity, reducing vulnerabilities and corruption risks in the public health system							
4.5.1	Applying open contracting data standards	1. No. of published datasets;	Website of C.N. ROMARM S.A.	Non-implementation of OCDS by C.N. ROMARM S.A. (Open	1. C.N. ROMARM S.A.;	Human and financial resources	2022	Mandatory measure for C.N. ROMARM S.A. and its



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				Contracting Data Standard); - Non-allocation of necessary human and financial resources				branches, according to HG no. 1269/2021.
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NOTES:

* *The Integrity Plan* of C.N. ROMARM S.A. was prepared by reporting to the objectives and actions provided for in the SNA 2021-2025, to the specific field of competence of C.N. ROMARM S.A. and taking into account the responsibilities established for C.N. ROMARM S.A. by this strategy;

**The general objectives and measures included in the *integrity plan* shall apply accordingly to the subordinate institutions with responsibilities in implementing the provisions of the *Strategy*.

Abbreviations used in the Integrity Plan for the implementation, at the level of C.N. ROMARM S.A., during the period 2021 - 2025, of the National Anti-Corruption Strategy

SNA – National Anti-Corruption Strategy;
API – Internal Public Audit;

Integrity Plan Coordinator of CNR and its branches

Dr. Ing. Dipl. TOADER Ulise