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Advancing democracy and human rights

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CIVIC MONITORING OF POLICE REFORM IN THE REPUBLIC OF MOLDOVA

2019 retrospective
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SUMMARY

General Framework of Police Reform. 2019 year indicated a path towards a tendency for increasing the level of citizens' confidence in the Police reaching by the end of the year 39.5% - value close to the one established by the "Support for the Police Reform" Agreement which is 41%.

Three Governments operated in the Republic of Moldova during 2019. Following the cabinet reshuffle, changes have been also implemented in the management of GIP and its subdivisions, causing difficulties in achieving the activities set out therein, which denotes a dependence of police activity on the political factor.

The objectives proposed in both Governments' Programmes of Activities are broadly in line with all the objectives and activities included in the Police Development Strategy and the Budget Support Program for the Police Reform, ensuring the continuity in the implementation of the activities undertaken therein.

At the same time, in 2019, frequent changes were implemented in the maximum number of employees and structure of the GIP, which shows a lack of general and continuous vision on the number of personnel involved and on the modus operandi of the institution, especially under the existence of a moratorium established for the appointment of the budgetary sector staff for vacant positions available therein, including in the GIP and under the conditions of the staff massive fluctuations.

Achievement of the objectives of the police reform. **Objective 1** has the mission to ensure access to more qualitative police services by enhancing the professionalism, transparency and efficiency of the Police. Quantitatively, it is the objective with the most commitments comprising the largest number of actions (7) and sub-actions (36).

According to the findings of Promo-LEX, 25 of the sub-actions (69.4%) were expected to be implemented in the period between 2016 and 2019. Of these, in the opinion of the Association, 5 (20%) are fulfilled sub-actions, ten (40%) – partially fulfilled, six (24%) – unfulfilled, while in the case of four sub-actions (16%) the Association could not assign any rating due to too general formulations or unmeasurable indicators.

It should be noted that in 2019, the completion deadline for four sub-actions expired, two of which were qualified as partially fulfilled, while in the case of another two, Promo-LEX, could not assign any rating due to too general formulations, or unmeasurable indicators. At the same time, of the sub-actions regarded as unfulfilled in the previous Reports, one sub-action changed its rating in 2019, from unfulfilled into partially fulfilled. It is also important to point out that the implementation for the sub-action 1.1.1 has been evaluated, the latter being qualified as fulfilled in the previous Reports.

The sub-action no. 1.6.3.- consolidating the operational management by clearly establishing the domain and creating a complex system to ensure decision support based on an integrated operations management system of the operational management in the implementation of the information system - presents a considerable risk of non-implementation.

The Policy Matrix comprised three actions under Objective 1 with performance indicators to be achieved in 2019. Of these, Promo-LEX considers that the performance criteria set for one action have been fulfilled, for one action – have not been fulfilled, while for the other action – have been partially fulfilled.

The performance criteria set for 2020 for A.1.1 - achieving the ratio of 40 % officers/60% non-commissioned officers within the Police as well as for A.1.3. - the operationality of JLETC in its

established components - present a considerable risk of non-implementation of the performance indicators.

Objective 2 also aims at increasing citizens' access to more qualitative police services; the emphasis being laid on respecting human rights in the activity of the Police. Quantitatively, the objective contains practically the fewest actions (2) and sub-actions (8).

According to the methodology, keeping in mind the Action Plan on the implementation of the PDS, six sub-actions have been assessed therein, of which: two have been previously assessed, being qualified as unfulfilled, while four are in the process of being implemented. No sub-actions under this Objective are expected to be completed for 2019. Both sub-actions assessed prior to 2019 remained unfulfilled during the reference year.

The Policy Matrix comprised a single action under Objective 2 with performance indicators to be achieved in 2019, which were qualified as partially fulfilled.

Objective 3 aims at increasing the capacity of the Police in combating crime and ensuring public security. It contains 2 actions and 12 sub-actions. According to Promo-LEX observations, ten of the sub-actions (83.3%) were planned for the period of 2016 - 2019.

Regarding the degree of achievement of the activities planned, Promo-LEX notes that out of 10 sub-actions subject to assessment, only 3 (30%) can be considered as fulfilled, one sub-action (10%) – is unfulfilled, three (30%) – partially fulfilled, while in the case of the other three sub-actions (30%) – the Association could not assign any rating due to too general formulations, or unmeasurable indicators.

The completion deadline expired in the case of two sub-actions only in 2019, both of them being impossible to be evaluated, due to unmeasurable indicators. The rating for one sub-action has been changed from unfulfilled into fulfilled.

As for the Policy Matrix, the indicators for the action A.3.1. have been partially fulfilled.

Objective 4 contains sub-actions oriented towards bringing the police service in line with European and international standards. It is a general objective, which contains 3 actions and 20 sub-actions. We consider that out of 11 sub-actions, two (18.2%) were fulfilled, whereas one (9%) remained unfulfilled. Six other (54.5%) were qualified as partially fulfilled, while in the case of two actions, the Association could not assign any rating due to too general formulations or unmeasurable indicators. At the same time, we emphasize that two other sub-actions (4.1.1. and 4.1.2.) were fulfilled before the expiry of the deadline set.

The completion deadline expired in the case of two sub-actions in 2019, one of which was qualified as unfulfilled, while in the case of the other one, the Association could not assign any rating due to too general formulations, or unmeasurable indicators. The rating for four sub-actions has been changed from unfulfilled into partially fulfilled.

The sub-action no. 4.2.10 - Development of the Police Integrated Information System presents a considerable risk of non-implementation.

As for those three actions set by the Policy Matrix, Promo-LEX qualified the performance criteria established for 2019 for two actions as fulfilled, and for one action as partially fulfilled.

Objective 5 has been developed with the purpose of promoting and ensuring transparency of the activity and professional integrity of the Police. It contains 2 actions and 8 sub-actions. Five sub-actions out of 8 have a continuous term, in respect of which the Promo-LEX Association proposed some recommendations. Hence, the degree of achievement of the objective hereof remained the same. Of these, two sub-actions were qualified as partially fulfilled, while one sub-action as fulfilled.

The sub-actions 5.1.3 - Development of the electronic system of the fact-finding and recorded traffic offences in order to reduce human intervention in this activity and 5.1.4 - Reorganization of public procurements system within the Police and training the staff in charge - present a considerable risk of non-implementation thereof.

As for the indicators set by the Policy Matrix for the action A.5.1. for 2019, Promo-LEX found that the criteria have been achieved.

General Conclusions. Out of the total number of activities planned, 53 sub-actions (63%) were to be implemented in the period up to and including 2019. Of these, Promo-LEX qualified the degree of achievement in respect thereof as follows: *13 sub-actions – fulfilled (24.5%); 21 sub-actions – partially fulfilled (39.6%); 10 sub-actions – unfulfilled (18.9%).* On the same lines, *9 sub-actions (17%) are too generally formulated, while indicators are unmeasurable.*

During the year 2019, 8 sub-actions (9%) were to be completed, of which, according to Promo-LEX: *two were partially fulfilled, one – unfulfilled, while in the case of five – no assessment is available due to unmeasurable indicators.*

Of all performance criteria set for 2019 within the Policy Matrix for 9 actions, the Promo-LEX Association qualified: *the indicators for four actions as fulfilled (44.4%); indicators for four actions as partially fulfilled (44.4%) and indicators for one action as unfulfilled (11.1%).*

INTRODUCTION

The Promo-LEX Association is a non-governmental, non-profit and apolitical organization, which pursues public benefit and operates in accordance with the applicable laws of the Republic of Moldova. The mission of the Promo-LEX Association is to contribute to the development of democracy in the Republic of Moldova by promoting and defending human rights, monitoring democratic processes and strengthening civil society.

The Republic of Moldova needs profound reforms in many areas. One of these areas is the activity of internal affairs bodies and the police - institutions empowered to protect the rights of citizens. Historically, institutions in this field are undergoing a continuous process of restructuring and modernization. In this context, on May 12th, 2016, the Government of the Republic of Moldova adopted the 2016-2020 Police Development Strategy. In the same year, the EU Delegation and the Government of the RM signed the Support for Police Reform Financing Agreement, providing for complementary support for monitoring the Police Reform.

In order to fulfill the statutory provisions, in the period of December 14th, 2018 - December 13th, 2021, the Promo-LEX Association is implementing the "Civic Monitoring of Police Reform in the Republic of Moldova" project, funded by the European Union as of December 14th, 2018.

The "Civic Monitoring of Police Reform in the Republic of Moldova" highlights the role of civic oversight by non-governmental organizations during the implementation of reforms, as well as the right of citizens to participate in the decision-making process. The overall objective of the project is to consolidate the responsibility, efficiency and transparency of the police reform in the Republic of Moldova.

The findings and conclusions of the civic monitoring of the police reform are presented in periodic, annual and semi-annual reports, elaborated by the Promo-LEX Association.

Report no. 3 is an annual one, representing a post-factum synthesis of the conformity of the reform throughout the calendar year of implementation - 2019, established by comparing the content of official reports submitted by the police with the observations made by the experts of the Promo-LEX Association. The observations of the monitors are made based on the analysis of the official documents, interviews with decision-makers and results of the direct observations, and other relevant information obtained from the monitoring methodology.

METHODOLOGY FOR CIVIC MONITORING

The monitoring reports are developed based on a methodology prepared by an international expert, which includes, on the one hand, methods used to analyze documents and interviews with central level decision-makers, exploited mainly by the central team of the Association. On the other hand, the methodology provides for direct observation and interviewing of monitoring subjects at regional and local levels.

The conclusions of the Promo-LEX Association on the fulfilment of operational objectives of the reform have been developed by referring to the performance indicators and the deadlines stipulated in the relevant program documents. The ratings used to assess the achievement of the objectives are: *fulfilled*, *partially fulfilled* and *unfulfilled*. According to the existing methodology, the rating - *fulfilled* is assigned to actions/activities that were considered sufficient and relevant for the achievement of the proposed objective; *unfulfilled* is assigned to the actions/activities that did not generate the intended objective; and *partially fulfilled* is assigned to the actions/activities that did not fully contribute to the achievement of performance indicators.

Similarly, with respect to the Policy Matrix, the ratings used to assess the achievement of the performance criteria are as follows: *achieved*, *partially achieved* or *unachieved*.

The sub-actions, which are too broadly formulated and whose indicators are immeasurable contain comments only, without the award of the “fulfilled”, “partially fulfilled” or “unfulfilled” ratings.

Report no. 3 of civic monitoring of police reform in the Republic of Moldova is an annual report, developed for the 2019 calendar year of reference.

It analyzes the actions/the sub-actions necessary for the implementation of the Police Development Strategy 2016-2020, whose deadline expired in 2019; continuing activities, to be implemented in the period up to and including 2019; whose deadline expired prior to 2019, being qualified as unfulfilled in the previous reports¹. The Report no. 3 does not list the sub-actions qualified as obsolete or inappropriate by implementing institutions and assessed in previous reports of civic monitoring².

Also, the Report no. 3 provides an analysis of the extent to which the performance indicators have been met for the activities set through the Policy Matrix developed for 2019.

In this connection, the monitors analyzed the Police Action Plan for 2019³, Progress Report for 2019 on the implementation of the 2016 - 2020 Police Development Strategy⁴, the Police Activity Report for the first semester of 2019⁵ and activities carried out by the MIA, GIP and their subdivisions in the first half of 2019.

In addition to the analysis of documents, the methodology for civic monitoring of the degree of achievement of the reform in 2019 included also on-site research tools such as direct observation, interviews and points of order. Thuswise, during the period from 2nd to 17th of March, the monitors conducted interviews with the management of 41⁶ Police Inspectorates or persons designated by them, as well as 35 interviews with the staff of Human Resources Departments/Services in the Police Inspectorates and Police Directorates.

¹ The Report also shows an analysis of the sub-action 1.1.1. as far as implementation of results is concerned, qualified by Promo-LEX as fulfilled in the Report no.1.

² Report no. 2. Civic Monitoring of Police Reform in the Republic of Moldova, pages 8-10. <https://bit.ly/2wRISXX>

³ 2019 Police Action Plan, available at: <https://bit.ly/38mbNkL>

⁴ Progress Report for 2019 on the implementation of the 2016-2020 PDS. <https://bit.ly/39HZChA>

⁵ Police Activity Report, 1st semester, 2019, available at: <https://bit.ly/35eCZQx>

⁶ No interview has been conducted with Ciocana PI under Chisinau PD, because of the postponement of the interview for 11th -19th March period and change in the Inspectorate's leadership.

On the same lines, giving consideration to the state of emergency declared by the Government, three⁷ of the interviews, were conducted remotely via telephone. On the 5th and the 13th of March 2020 both visits and interviews were conducted in the Zonal Dispatch Points located in Chisinau municipality as well as in those located in the Northern, Central and Southern parts of the country.

Between 2nd and 13th of March visits were conducted in the following eight Provisional Detention Isolators: Edinet, Riscani, Causeni, Orhei, Chisinau, Singerei, Cimislia, Cahul, whereby the detention conditions have been observed and an interview has been conducted with a representative of the Detention and Escort Service. On the same lines, giving consideration to the state of emergency declared by the Government, the interviews with the representatives of Hancesti and Ungheni Provisional Detention Isolators were conducted via telephone.

Also, during the same period 28 vehicles ensuring/that ensured throughout the 2019 year the transportation of prisoners, in the disposal of Edinet (3), Floresti (1), Straseni (1), Riscani (1), Causeni (2), Orhei (1), Criuleni (1), Balti (1), Cantemir (1), Singerei (1), Falesti (1), Cimislia (1), Ceadar-Lunga (1) Comrat (2), Anenii-Noi (1), Cahul (2) Police Inspectorates and Chisinau PD (1) have been observed. It should be mentioned that, only those vehicles that at the time of the visit in the PIs and PDIs were not on missions have been observed therein.

Between 5th and 18th of March visits were conducted in the regional investigation units under the Police Directorate of Chisinau municipality and Police Directorate of ATU Gagauzia, North Division of the NII, South Division of the NII. A further visit was conducted in the National Investigation Inspectorate as well as an attempt was made to identify the headquarters of the East Division of the NII.

During the period from 15.11.2019 to 06.03.2020, the Promo-LEX monitors have conducted fact-finding visits in 14 renewed police stations.

Throughout the 2019 year, the Promo-LEX monitors have identified and tracked 52 *Facebook* pages belonging to territorial subdivisions of Police, for the purposes of assessing the number of pages and posts published by them.

As from 26th of February 2020, Promo-LEX has sent requests for information to Police Inspectorates and Police Directorates, and up to 26th of March 2020, 27 responses from territorial subdivisions of Police have been received. We particularly appreciate, the provision of information requested given the state of emergency declared by the Government. However, no response was received until the 26th of March 2020, from the following subdivisions: Ciocana PI, Riscani (Chisinau) PI, Centru PI, Buiucani PI, Hincesti PI, Ialoveni PI, Straseni PI, Cimislia PI, Ceadir-Lunga PI, Comrat PI, Drochia PI, Glodeni PI, Donduseni PI, Riscani PI, Ocnita PI, Briceni PI, Soroca PI.

Requests for information were also sent to the General Inspectorate of Police and 112 Emergency Service.

On the 6th of March 2020, Promo-LEX submitted a request for information from the 112 Emergency Service on the average duration of response of police services to urgent calls of citizens in 2019, in each territorial administrative unit (district/municipality). In response, on the 25th of March, with reference to the provisions of art. 19 para. (2) of the Law 174/2014 on the organization and functioning of the Single National Emergency Calls Service 112⁸, the 112 Emergency Service concluded that "the release by the 112 Emergency Service of the requested

⁷ Ungheni PI, Hincesti PI, Ialoveni PI

⁸ Art. 12 para. (2) of the Law 174/2014: From the time of transmission by the 112 Service of the emergency call data to the dispatchers of the specialised emergency services, the 112 Service and its staff shall not be liable for the subsequent activities of the specialised emergency services.

information, will be considered as being an interference in the activity of the GIP". Thereby, the 112 Emergency Service recommended obtaining the consent from the GIP.

Taking into account the response provided by the 112 Service, Promo-LEX finds **the unjustified restriction on access to information**, a right guaranteed by the Constitution of the Republic of Moldova and Law 982/200 on access to information. We note that, according to art. 5 para. (2) letter b) of the aforementioned Law, information providers, i.e. **holders of official information**, required under the present law to provide such information to applicants, are public institutions. Accordingly, the possession of official information on the duration of police reaction to emergency calls of citizens obliges the public institution to provide the requested information. The unjustified establishment of additional procedures for obtaining the consent of the GIP, in the opinion of Promo-LEX, is an unjustified refusal to provide the requested information, and respectively circumventing both legal and constitutional provisions. Moreover, according to section 7 of the Regulation for keeping the State Register developed by the Automated Information System of the Single National Emergency Calls Service 112, approved by the Government Decision no. 1207/2018, the 112 Service, as holder of the Register, shall ensure the management of the access to the information contained therein.

GENERAL FRAMEWORK OF POLICE REFORM

The 2016-2020 Police Development Strategy (PDS) and the Action Plan on its implementation were approved by Government Decision no. 587 on 12.05.2016. The Strategy ensures the continuity of the reform process initiated by the Concept for the Reform of the Ministry of Internal Affairs (MIA) and its Subordinated and Decentralized Structures and represents an alignment of the actions planned with the provisions of the European Union - Republic of Moldova Association Agreement⁹.

The General Objectives of the Strategy are:

1. Strengthening the responsibility, efficiency, transparency and professionalism of the Police.
2. Fair, efficient and effective application of human rights legislation in the activity of the Police.
3. Consolidating the capacities of the Police to fight organized crime, trafficking in human beings, cybercrime, violence, including gender offenses, drugs and weapons smuggling, counterfeiting and money laundering.
4. Creating a modern police service, in accordance with the best international standards and practices of the European Union, able to respond proactively and equally to the needs of citizens and society as a whole.
5. Promoting and implementing the principle of zero tolerance for corruption, discrimination and ill-treatment in the activity of the Police.

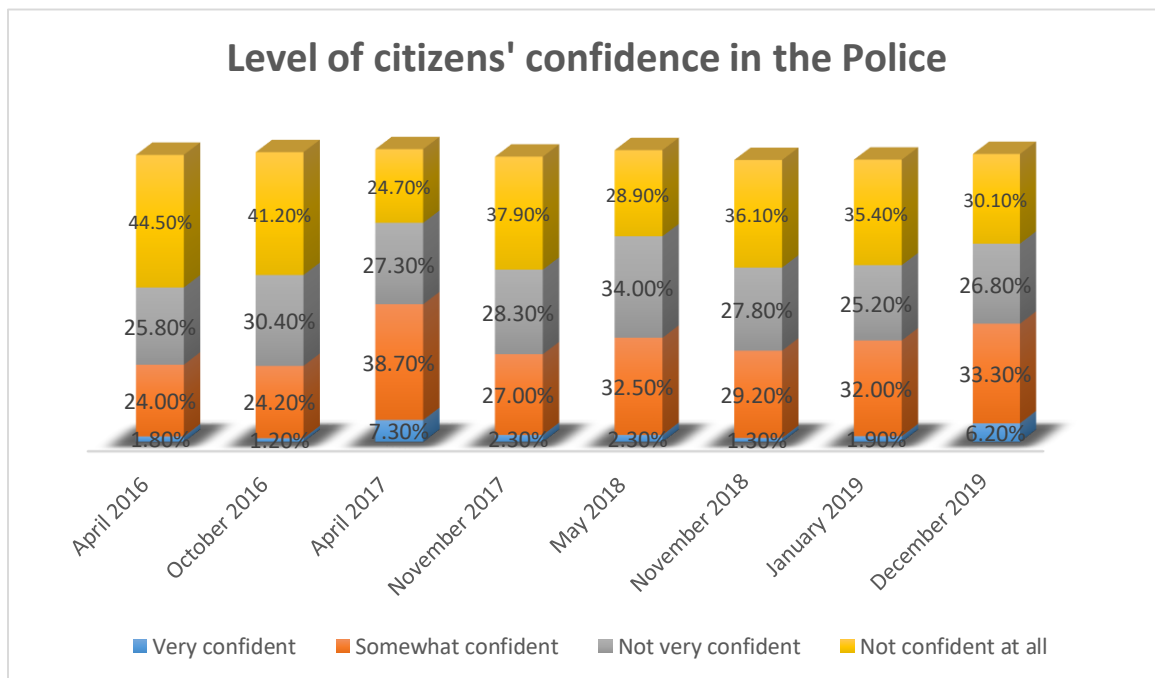
Subsequently, in December 2016, the Government of the Republic of Moldova (RM) and the European Commission signed the "Support for Police Reform" Financing Agreement worth 57 million euros.

The General Objective of the "Support for the Police Reform" Agreement (Budget Support Program) is to assist the Government of the Republic of Moldova in ensuring the rule of law, consolidating public order and security, combating organized crime and protecting human rights by developing a transparent, efficient, responsible and accessible policing. The indicator of the implementation of the general objective is *an improved and maintained level of confidence in the Police (share of people who trust the police gradually increases)*, the reference value of confidence being that of April 2014 - 31%. The target set for the implementation of the general objective is to increase the level of population's confidence in the police and reach *at least 41% by 2019*.

In Chart no. 1, we can see the tendency to increase the confidence of citizens in the Police (the share of citizens who are very confident and those who are somewhat confident), reaching by the end of the year 39.5% - value close to the one established by the "Support for the Police Reform" Agreement.

⁹ Title II: "Political Dialogue and Reform, Cooperation in the Field of Foreign and Security Policy" and Title III "Justice, Freedom and Security".

Chart no.1. The level of citizens' confidence in the Police, according to the Barometer of Public Opinion



The specific objectives of the Budget Support Program are similar to the general objectives of the Police Development Strategy with the express mention of alignment with the best EU and international standards and practices. The description of the specific conditions and annual indicators for the disbursement of installments is provided in the Policy Matrix.

We note that, three Governments operated in the Republic of Moldova during 2019, respectively with three ministers of Internal Affairs and three heads/interim heads of the General Inspectorate of Police. Following the cabinet reshuffle, changes have been also implemented in the management of GIP and its subdivisions, causing difficulties in achieving the activities set out therein. The change in the management of both GIP and its territorial and specialized subdivisions, along with the cabinet reshuffle denotes a dependence of police activity on the political factor.

The Activity Program of the Government, voted on June 8th, 2019, includes the following objectives:

- depoliticizing the Ministry of Internal Affairs by delimiting the functions of the police from the other functions performed by the system. The reform of the Ministry of Internal Affairs will focus on the creation of tools and mechanisms to exclude harmful practices of police involvement in the persecution of people;
- implementation of the “Community Policing” principle, so that, at the local level, the police would not be only a “sanctioning” entity, but rather one that proactively collaborates with the local public authorities and the citizens of the community;
- ensuring the exclusion of unjustified arrests and interception of telephone calls;
- introducing an electronic system of records for the cases investigated by the police and the prosecutor’s office to exclude their abuses;
- eliminating torture and improving the conditions of detention in the respective institutions.¹⁰

¹⁰ The Activity Program of the Government of the Republic of Moldova <https://bit.ly/2YRTIJO>

The Activity Program of the Government¹¹, voted on November 14th, 2019, includes the following objectives:

- implementing a set of urgent actions to halt the increase in serious and particularly serious crimes in the country;
- rehabilitating and strengthening the institutional and professional capacities of police subdivisions by identifying and using highly qualified personnel;
- developing and implementing an effective road traffic casualty reduction action plan;
- improving the system of initial and continuous training of police officers, with emphasis on practical training; unifying the training system at the Ministry of Internal Affairs level under the auspices of the “Stefan cel Mare” Academy;
- expanding the implementation of the concept of public policing at the national level and reorienting the repressive activities of police subdivisions towards pro-active policing;
- reorganizing the patrol concept at the national level;
- planning human resources and logistics planning based on tactical analysis;
- developing a unique curriculum for initial police training;
- reorganizing the strategic and operational police subdivisions and their functioning;
- reviewing the human resources management and creating attractive and competitive conditions for new employees;
- delineating clearly the public order and the security powers between the police and the carabinieri, as well as other structures of the Ministry of Internal Affairs with responsibilities in the field;
- establishing institutionalized mechanisms for formal consultation and participation of local public authorities and society in the management of public order and security;
- reviewing the organizational and functional framework for operational management at the level of the General Inspectorate of Police, which is outdated or revised by segments.

It is welcome that the objectives proposed under both Activity Programs are broadly in line with all the objectives and activities included in the Police Development Strategy and the Budget Support Program for the Police Reform, ensuring the continuity in the implementation of the activities undertaken therein. We should mention here the implementation of the Concept for the community policing activity as a common element proposed in both programs. At the same time, we welcome that the activities contained in the Police Development Strategy, which were delayed and remained unfulfilled during the previous years (such as reorganizing the patrol concept at the national level, delineating clearly the public order and the security powers between the police and the carabinieri, as well as other structures of the Ministry of Internal Affairs with responsibilities in the field) have been included in the Government’s Activity Program voted on November 14th, 2019.

Taking into account that 2020 is the last year of implementation of the (2016-2020) Police Development Strategy and the 2017-2020 Budget Support Program, in order to ensure the continuity of the activities undertaken and proposed through strategic documents and Development Partnership Agreements, we advise the Government of the Republic of Moldova to review the degree of preparation of the aforementioned documents, make all reasonable efforts to ensure that the objectives proposed therein are met as well as to approve new strategic development documents for the coming period.

Over the year, changes also were implemented in the maximum number of employees and structure of the General Inspectorate of Police. Thus:

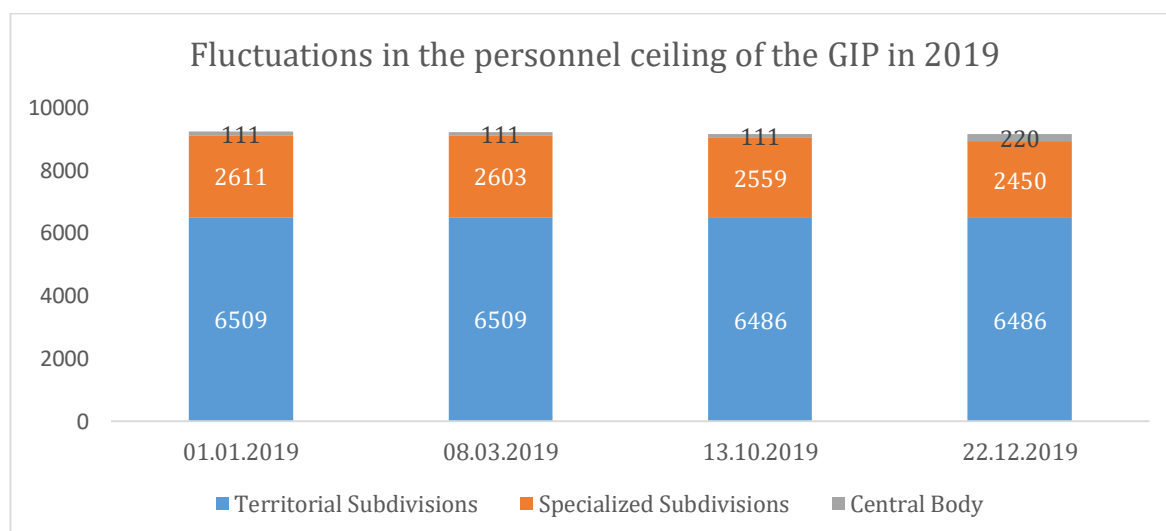
- pursuant to Section 6 of the Government Decision no. 120 of 27.02.2019¹², the MIA will ensure the transfer of **8 public officials** with a special status from the GIP under the MIA and 6 public

¹¹ The Activity Program of the Government of the Republic of Moldova <https://bit.ly/3bRb3ET>

¹² <https://bit.ly/2t0oVvs>

- officials with a special status from the Information Technology Service under the MIA responsibility to the Inspectorate of Operational Management of the Ministry of Internal Affairs;
- the personnel ceiling of the MIA headquarters raised from 95 to 135, the Division of Institutional Development Policies has been created under the Government Decision no. 438 of 11.09.2019. Also the Government Decision no. 986/2012 on the structure and maximum number of employees in the GIP has been amended by the same Decision mentioned above, where the personnel ceiling has been reduced from 9223 to 9156 (**reduced by 67 positions** (15 being previously reduced and transferred to 112 Automated Information System (AIS))), 44 positions have been reduced in the specialized subdivisions (2603-2559), as well as 23 positions in the territorial ones (6509-6486). According to the information note, the 52 positions that were to be effectively transferred were in fact selected out of vacant positions, in such a way as not to affect either the management or operational capacity of the GIP. The Draft Government Decision has not been subject to public consultation.
 - a new Regulation on the organisation and functioning of the GIP, of a new GIP structure has been approved, as well as the responsibility for the creation of specialized subdivisions of the GIP was transferred to the minister of Internal Affairs under the Government Decision no. 547 of 12.11.2019¹³. Moreover, although the personnel ceiling of the GIP remained the same, the one of the central managing body has **increased from 111 to 220 positions**, of which 214 – public officials with a special status, 6 – public officials.

Chart no.2. Fluctuations in the personnel ceiling of the GIP (2019)



It is important to point out that frequent changes implemented in the maximum number of employees and structure of the GIP, show a lack of general and continuous vision on the number of personnel involved and on the modus operandi of the institution, especially under the existence of a moratorium established for the appointment of the budgetary sector staff for vacant positions available therein¹⁴ including in the GIP and under the conditions of the staff massive fluctuations.¹⁵

As for the actions set out in the Action Plan on the implementation of the Police Development Strategy, and Policy Matrix on the implementation of the Budget Support for Police Reform, we note that in 2019 the completion deadline for 8 sub-actions within 6 actions contained in the 2016-2020 Action Plan on the implementation of the Police Development Strategy expired. At the same time, it should also be specified that 31 sub-actions within 13 actions have a continuous

¹³ <https://bit.ly/2LLwuwY>

¹⁴ Government Decision no. 1281 as of 26.12.2018 for establishing the temporary moratorium on the recruitment of personnel from the budgetary sector to fill the vacant positions registered therein, go to the link: <https://bit.ly/30L8r7r>

¹⁵ The Promo-LEX Opinion in the context of the Police Reform and the Community Police Activity on the rationality and the opportunity to restore the work of the district police officer in every locality, pages 6-7, go to the link: <https://bit.ly/2R84Uws>

term, and should be implemented in the period up to and including 2019. The performance indicators contained in the Policy Matrix which were set for all 9 actions, should have been achieved towards the end of 2019.

IMPLEMENTATION OF POLICE REFORM OBJECTIVES FROM THE CIVIC MONITORING PERSPECTIVE

OBJECTIVE 1: Consolidating the responsibility, efficiency, transparency and professionalism of the Police

Objective 1 has the mission to ensure access to more qualitative police services by enhancing the professionalism, transparency and efficiency of the Police. Quantitatively, it is the objective with the most commitments comprising the largest number of actions (7) and sub-actions (36).

According to the observations of Promo-LEX, 25 of the sub-actions (69.4%) were planned to be implemented in the period between 2016 and 2019. Of these, in the opinion of the Association, five (20%) are fulfilled sub-actions, ten (40%) – partially fulfilled, six (24%) – unfulfilled, while in the case of four sub-actions (16%) the Association could not assign any rating due to too general formulations or unmeasurable indicators.

It should be noted that in 2019, the completion deadline for four sub-actions expired, two of which were qualified as partially fulfilled, while in the case of another two, Promo-LEX, could not assign any rating due to too general formulations, or unmeasurable indicators. At the same time, of the sub-actions regarded as unfulfilled in the previous Reports, one sub-action changed its rating in 2019, from unfulfilled into partially fulfilled. It is also important to point out that the implementation for the sub-action 1.1.1 has been evaluated, the latter being qualified as fulfilled in the previous Reports.

The sub-action no. 1.6.3.- consolidating the operational management by clearly establishing the domain and creating a complex system to ensure decision support based on an integrated operations management system of the operational management in the implementation of the information system - presents a considerable risk of non-implementation.

The Policy Matrix comprised three actions under Objective 1 with performance indicators to be achieved in 2019. Of these, Promo-LEX considers that the performance criteria set for one action have been fulfilled, for one action – have not been fulfilled, while for the other action – have been partially fulfilled.

The performance criteria set for 2020 for A.1.1.- achieving the ratio of 40 % officers/60% non-commissioned officers within the Police as well as for A.1.3. - the operability of JLETC in its established components - present a considerable risk of non-implementation of the performance indicators.

Based on the Police Development Strategy

1.1. A transparent and merit-based system for recruiting and promoting staff based on clear selection, assessment and promotion criteria

1.1.1 Development of procedures for recruitment (selection) of staff for the Police;

Performance Indicator: staff recruitment (selection) procedures established therein

Timescale for completion: second half of 2016

The sub-action 1.1.1 contained in the Report no. 1 on civic monitoring of police reform was qualified by Promo-LEX **as fulfilled**. With a view to assessing the implementation of the

recruitment procedures established by Order no. 451 of 13.11.2017¹⁶, i.e. the recruitment ones, the Promo-LEX monitors followed the publication of job advertisements both from domestic and foreign sources, on politia.md website in the Career Section¹⁷, on information panels available in the premises of police inspectorates, as well as on the Facebook page of territorial subdivisions.

We note that, in accordance with the aforementioned recruitment procedure, publication of vacancies takes place as follows:

- All vacancies in the subdivisions shall be published by the head of the Human Resources Service (HRS) each Monday on the GIP website, to ensure that employees have access to information on **recruitment from internal sources**.
- If there are no applications for filling vacant posts from the internal source during 5 working days, the head of the HRS shall be bound to publish on the Police website, all vacancies available to be filled **from external sources**.
- At the same time, the head of the HRS, shall extract from the GIP website all vacancies published therein that are to be filled by competition, and arrange for their publication on the information panels available in the subdivision's headquarter.¹⁸
- The head of the HRS, or in his/her absence, another HRS employee via the person administering the account of the subdivision created on Facebook social network shall weekly post and update the job advertisement on vacancies available in the Police sector.

Furthermore, information was requested on the number of job advertisements published from internal source, and the competitions organized from external source. Information for the first half of 2019 was requested from territorial subdivisions in November 2019, and for the whole year in February-March 2020.

It is worth mentioning that until 25th of March 2020, responses to requests for information were received for both first half of the year and annual information from 22 territorial subdivisions, for competitions organized for 28 territorial subdivisions. Here we will point out that human resource services in Chisinau and ATU Gagauzia Police Directorates operate in a regionalized manner, organizing competitions for Botanica, Buiucani, Centru, Ciocana, Riscani Police Inspectorates, as well as for Comrat, Ceadir-Lunga, Vulcanesti Police Inspectorates.

In addition, we note that only three police inspectorates responded to the request for information from February, and only eight police inspectorates (Briceni, Cimislia, Donduseni, Drochia, Glodeni, Ocnita, Riscani, Strasenii) responded to the request for information from November 2019. Consequently, as regards the latter, the information referred to covers the first half of 2019 only. (see Annex no. 1).

Three police inspectorates from Hincesti, Ialoveni, Soroca provide no answer to the requests for information that were sent to them.

From the analysis of the information obtained and following the monitoring of the politia.md website, in the *career, police jobs* section, Promo-LEX found the following:

- Publication and renewal of information on job advertisements is done differently. In the case of at least seven police inspectorates (Briceni PI, Donduseni PI, Floresti PI, Nisporeni PI, Orhei PI, Rezina PI, Taraclia PI), the information on job advertisements whose deadline already expired, is excluded, this becoming unavailable for the next period. Differently, in the case of the other police inspectorates, the job advertisements whose deadline has expired are kept on the politia.md website;

¹⁶ <https://bit.ly/2V1rCY0>

¹⁷ <https://bit.ly/3bLNbTb>

¹⁸ The announcement extracted from the GIP website is to include on a mandatory basis the information on: a) name of the subdivision conducting the competition for filling the vacancy; b) name of the vacancy for which the competition is being organized; c) contact information; d) as well as the phrase "For more information see "www.politia.md" website.

- In the case of at least 17 police inspectorates (Anenii-Noi, Cantemir, Causeni, Ceadir-Lunga, Comrat, Dubasari, Edinet, Falesti, Floresti, Nisporeni, Riscani, Singerei, Soldanesti, Stefan-Voda, Straseni, Taraclia, Telenesti), job advertisements were not displayed on the information panel in the premises of the subdivision, although at the time of visit of the Promo-LEX monitors, employment contests were open;
- Only in eight police inspectorates, were identified job advertisements, which have been published on the *Facebook* page of the respective subdivisions, the publication thereof being sporadic, having no specific frequency, the number of posts being significantly lower than the number of job advertisements published on *politia.md* website;
- There seems to be no record of the job advertisements that have been published, neither from internal source nor from the external one, from the following reasonings:
 - a) according to the responses to the requests for information sent therein, the number of competitions organized from the external source exceeds the number of job advertisements published therein from the external source, in at least 6 police inspectorates (Anenii-Noi, Buiucani (Chisinau), Centru (Chisinau), Falesti, Orhei, Taraclia);
 - b) Promo-LEX monitors found in eight police inspectorates (Anenii Noi, Buiucani (Chisinau), Botanica (Chisinau), Falesti, Bender, Causeni, Leova police inspectorates) more advertisements published on *politia.md* website than the number of advertisements provided by the respective subdivisions;
 - c) Promo-LEX monitors found in 20 police inspectorates (Anenii Noi, Buiucani (Chisinau), Botanica (Chisinau), Falesti, Calarasi, Leova, Centru (Chisinau), Balti, Cahul, Cantemir, Ceadir-Lunga, Ciocana (Chisinau), Comrat, Criuleni, Dubasari, Riscani (Chisinau), Soldanesti, Stefan-Voda, Telenesti, Vulcanesti police inspectorates) more advertisements published on *politia.md* website than the number of advertisements provided by the respective subdivisions.

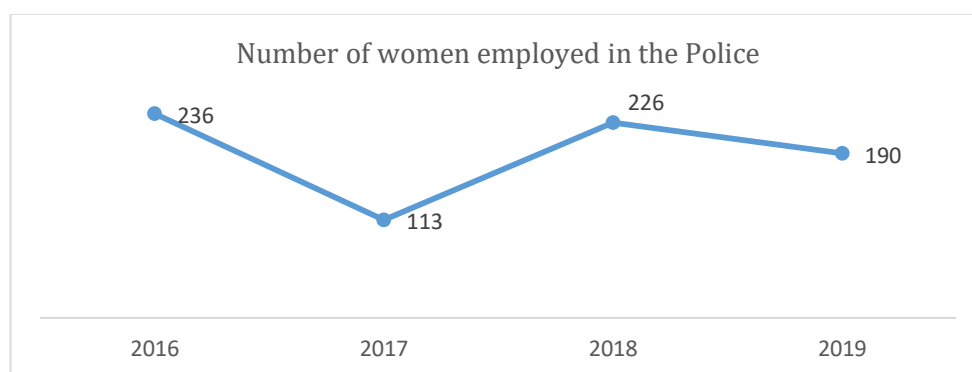
In view of the findings above, we recommend the General Inspectorate of Police, monitoring the compliance with the recruitment procedures, duly taking into account those highlighted by the Promo-LEX monitors, however where a large number of vacancies is available and in order to ensure competitiveness at the time of employment, it is imperative observing all advertising procedures and making additional efforts to promote the available police jobs.

1.1.4. Compliance with gender equality principle in the process of employment and promotion in the Police

Performance Indicators: positive dynamics in the number of women employed in the police, including in management positions

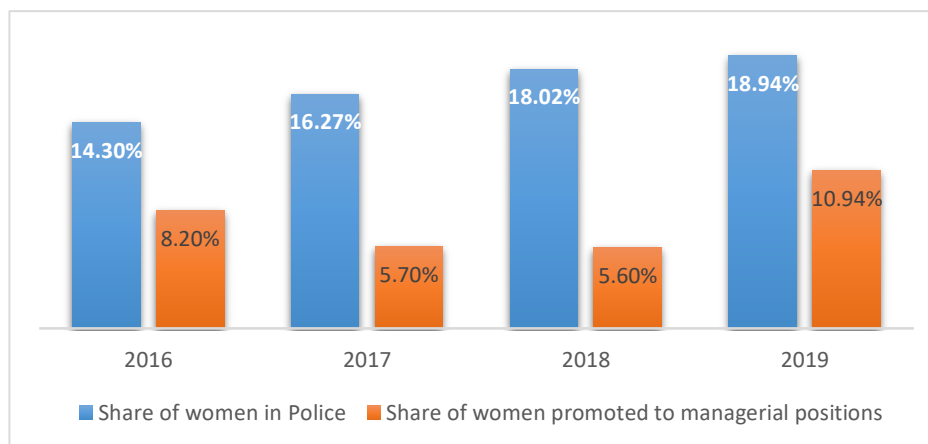
Timescale for completion: 2016–2020

Chart no.3. *Number of women employed in the Police, including in management positions, according to the PDS progress reports*



Building on the number of women employed in the Police in 2016, there is a negative dynamic in the number of women employed in the Police in 2019 in comparison with that of 2018 according to the Chart no. 3 above.

Chart no. 4. *The share of women in the Police as well as the share of women promoted to managerial positions, according to the Progress Reports for PDS implementation*



The chart above shows a double increase in the share of women promoted to managerial positions in 2019. Considering the data reflected in the reports on the implementation of the PDS, based on the progress indicator set out in the sub-action 1.4.4, the Promo-LEX Association finds that *both the number of women employed in the Police, and the number of those promoted to managerial positions is increasing. Thus, we further recommend the implementing institutions to take measures aimed at stimulating, supporting and increasing the number of women in the Police.*

According to the Report on the implementation of the PDS and the Budget Support Program, the number of women employed in the Police is **1772** (21.31%), including women on child-care leave (2.38%).

On the same lines, according to the 2019 Police Activity Report, the share of female police officers is 18.94 %, while the share of male ones is 81.06% (including the number of women and men on a maternity/paternity leave). According to the GIP, the number of female police officers amounts to the difference between the total number of women employed in the Police and the number of female civil servants and civilian employees.

However, at the request of Promo-LEX to provide information on the number of women employed with both territorial and specialized subdivisions of the GIP, to the situation at 31.12.2019, without employees on a maternity/paternity leave, a number of 1244 women, of the total of 7382 employees has been reflected therein. In view of the fact that in 2019 the personnel ceiling of the central managing body consisted of 111 employees, of whom about 50 % are women (56), we note that the maximum number of women effectively employed to the situation at 31.12.2019 was 1300 women or 17.34%. *Whence, Promo-LEX notes a state of uncertainty as regards the number of women who are effectively employed within the Police.*

1.1.5. Progressive increase of the share of non-commissioned officers in the Police. Revision of recruitment conditions and procedures for recruitment of officers and positions that can be filled by them

Performance Indicators: positive dynamics in the official statistical data on the share of non-commissioned officers in the Police

Timescale for completion: 2017–2020

Chart no.5 Share of non-commissioned officers in the Police according to the progress reports for PDS implementation



The chart no. 5 above shows an increase in the share of non-commissioned officers in the Police by 3.44% according to the staffing plan and by 1.66% according to the list of non-commissioned officers who have been employed therein. We note that, during 2019 the largest staff shortages were registered among non-commissioned officers (- 22.71% -June) and - 22.87% (December)), on 31.12.2019 the incomplete personnel containing 719 non-commissioned officers jobs.

According to the progress report on the implementation of the Police Development Strategy, for the purpose of implementing the Vision of the inversion of the jobs' pyramid and effective management of the risks linked to the achievement of the objective on progressive increase in the share of non-commissioned officers in the Police under Law no. 228 of 01.11.2018, entered into force on 7th of January 2019, the Law no. 288/2016 regarding the civil servants with special status within the Ministry of Internal Affairs was supplemented by a new article 12¹ "Access to the job due to the change in the post category" setting the conditions for filling the jobs by civil servants with special status in relation to posts' reduction in the category of officers corpus and their transfer to the category of non-commissioned officers corpus, while keeping all rights and guarantees, including previously accumulated salary. However, according to provisions of art. 12¹ of the Law no. 288/2016 the terms for the transfer from officer to non-commissioned officer had to be approved under the Government Decision.

According to the GIP response no. 34/57-844 of 26th of March 2020, as provided for in art. 12¹ of the Law no. 288/2016, the terms for the transfer from officer to non-commissioned officer had to be approved under the Government Decision, which failed to happen, although the draft GD has been endorsed by the Human Resources Directorate of the GIP in May 2019. The GIP is therefore unable to reverse the jobs pyramid and reach the share of 40% officers/60% non-commissioned officers without having a regulation approved with respect thereto.

Contrary to the aforementioned position, according to the Ministry of Internal Affairs, the regulatory framework for transfer shall be ensured under section 37¹ introduced in 2018 in the

Regulation on the career progression of civil servants holding a special status within the Ministry of Internal Affairs¹⁹. This norm provides that the civil servant with special status shall maintain his/her special rank in the event of transfer, (...) regardless of the level of professional seniority of the position assigned to him/her. When calculating the term for granting the next special rank, the term in the previous special or military rank until termination of office held within the Ministry of Internal Affairs or in any other national defense, state security or public order bodies shall be taken into account.

However, it appears that the mechanism for the transfer from the position of officer into the position of non-commissioned officer, referred to in art. 12¹ of the Law no. 288/2016 was not applied, the reversal of jobs taking place only from the account of vacant positions.

In conclusion, considering the aforementioned and also the large number of vacancies for non-commissioned officers as well as the moratorium imposed on the vacancies registered therein including the ones in the GIP, the Promo-LEX Association recommends the implementing authorities to identify the best solutions which shall ensure both the reversal of jobs pyramid and filling of vacant posts, especially the non-commissioned officers ones. On the same lines, Promo-LEX appreciates the efforts of the implementing institutions to reverse the jobs pyramid, especially considering the large employee turnover.

1.2 Development of initial and continuous professional training for police officers

1.2.3. Creation of a Joint Training Center for the staff of the Ministry of Internal Affairs in accordance with EU standards

Performance Indicators: Creation of an operational training center

Timescale for completion: 2017–2019

The Government Decision no. 53 of 17.01.2018 approved the creation of the Joint Law Enforcement Training Centre (JLETC) Joint Law Enforcement Training Centre of the MIA, with the legal address at 30 Nicolae Dimo St., Chisinau municipality, approving its statute, structure, the organizational chart of the Center, and the Action Plan for 2018 - 2021 for the establishment of the Center, although according to the Policy Matrix, the approval of the Action Plan was planned for 2017.

According to the Action Plan, the Center should be fully operational by the II-III quarters of 2021, both in terms of carrying out construction works, its technical and financial equipment, as well as in terms of organization and conduct of staff training.

The main 2019 achievements in terms of creating and operationalization of the Center were as follows:

- approval of both the Regulation for the organization and functioning of the Joint Law Enforcement Training Centre of the Ministry of Internal Affairs and the Strategic Development Program of the Joint Law Enforcement Training Centre for the period from 2019 and 2021.
- conducting the first training course for starting non-commissioned officers, and training of 55 non-commissioned police officers between 12.08.2019 and 6.12.2019;
- conducting ongoing training course for 378 police employees;
- initiating the procurement procedure for carrying out construction works of the Joint Law Enforcement Training Centre of the Ministry of Internal Affairs, according to the availability of financial allocations. Following the assessment of bids, the procurement procedure has been cancelled under the provisions of letter b), para.(1) art. 71 of the Law 131 of 03.07.2015 on public procurement, due to the fact that there have been less than three participants meeting the qualification requirements;

¹⁹ Approved by Government Decision no. 460 of 22.06.2017

- initiating repeated procurement procedure for carrying out construction works of the JLETC.

*Considering the fact that by the end of 2019 no procurement procedure for carrying out the construction works was completed therein and respectively - no economic operator has been selected, we qualify the sub-action 1.2.3. **as partially fulfilled** and recommend the implementing authorities making of all reasonable efforts in order to be awarded a construction services contract, but also to supervise the beginning of the works in the near term.*

1.3 Promoting the transparency principle in the decision-making process

1.3.3. Development of mechanism to interact with civil society and identify a mechanism enabling the civil society to control the actions of the Police;

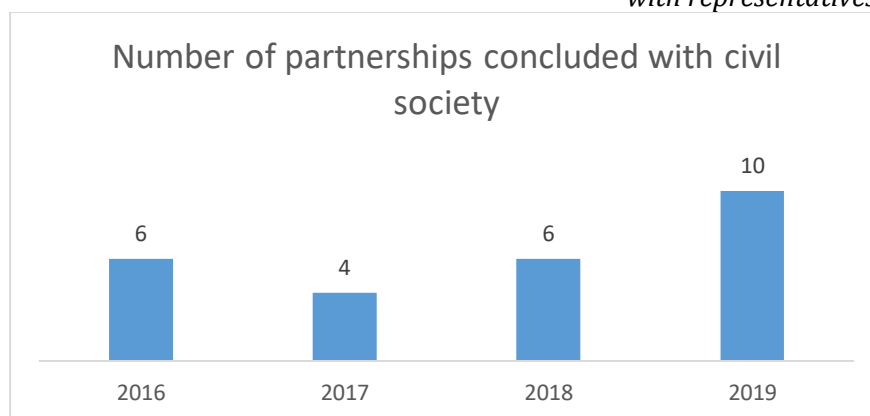
Performance Indicators: Partnerships created, Transparency in the activity of the Police ensured

Timescale for completion: 2016–2020

According to the Progress Report for the implementation of the PDS in 2019, 20 partnership agreements have been concluded with international organizations, public institutions or non-governmental association to carry out various activities to prevent anti-social phenomena in the GIP and its specialized subdivisions. Of these, 10 agreements have been concluded with the representatives of civil society. Thus, the GIP concluded partnership agreements with the Moldova - China Chamber of Commerce and Industry, “Eco-Razeni” Public Association and the European Neighbourhood Watch Association (EUNWA), Association for the Protection of Private Life, Soros-Moldova Foundation, “Initiativa pozitiva” Public Association , “Concordia. Proiecte Sociale” Public Association, “Promo-LEX” Public Association, “Center for Innovation and Policies in Moldova” Public Association, PH International, Sport Club “GARAGE 4X4” Public Association.

Also 60 cooperation agreements were signed with territorial subdivisions of the police in various fields of activities, in order to create a safe environment for the citizens.

Chart no. 6. *Number of partnerships concluded by the GIP with representatives of civil society*



Taking into account the above, as well as the upward dynamics showing an increase in the number of agreements signed/partnerships created therein, the Promo-LEX Association appreciates the efforts and the openness of the GIP for cooperation with the civil society.

According to the implementing institutions, the involvement of the civil society and the academia in management and consultation in decision-making processes shall be achieved by including the representatives of the voluntary sector in the composition of the Consultation Group of the Strategic Council of the GIP, set up with a view to obtaining support from civil society for developing the capabilities of the Police. The representatives of the voluntary sector are part of the Consultation Group of the Strategic Council of the GIP. At the same time, in the context of the approval of the unitary mechanism for coordination of the Police Reform, endorsed by the MIA

Orders no. 123/2017; 128/2018 and 51/2020²⁰, the Civil Society Participation Mechanism in the Police Reform process has been established. Thus, within the context of the steering committees, the civil society actively participated in these forums putting forward proposals for institutional development.

Building on the obligation for the Strategic Council to convene a meeting on the last month of each calendar quarter and publish the agenda, minutes of the sittings and Council's decisions on the website of the GIP, the Promo-LEX Association notes that neither meetings of the Strategic Council of the GIP have been conducted and even more nor the Consultation Group of the Strategic Council thereof have been consulted with a view to making decisions on this platform during 2019.

At the same time, we highlight the fact that by the end of 2019, there were no mechanisms of civil society control over the Police. *Thus, we repeat our recommendation for the implementing institution to direct its efforts towards identifying and establishing such a control mechanism.*

We highlight the fact that the initiative to elaborate the draft Government Decision on the creation of a Civil Council for monitoring the activity of the GIP, was not placed on the Government's agenda by the end of 2019, although the draft government decision was published for public consultations already on June 11th, 2018²¹, and republished for public consultations on 12.08 2019²².

In addition, to ensure process transparency in the activity of the Police, we recommend the publication of all documents (visions/concepts) on the reorganization of the GIP or its subdivisions, including the initiatives that are not secret or confidential, but refer to the activity of the General Inspectorate of Police.

1.3.4. Development and approval of the Concept for external communication of the Police

Performance Indicators: Concept developed, approved and implemented

Timescale for completion: 2017–2019

On October 3rd, 2017, the GIP Order no. 396 provided for the approval of the 2017- 2020 Police Development Communication Plan, which also includes a draft Plan on external communication for 2017, the latter supposed to be updated every three months. GIP Order no. 397 of October 3rd, 2017 also approved the "External communication" standard operational procedure. No document has been received in relation to the GIP request sent in the summer of 2019 on the provision of Progress Reports (if available) on the implementation of the Development Communication Plan.

Also, with a view to ensuring the full implementation of the sub-action thereof - namely the implementation of the Concept for external communication, the Promo-LEX Association called for the publication of the plan updated every three months, as well as of progress reports on the degree of realization of the Police Development Communication Plan. We note that no progress report on the implementation of the Police Development Communication Plan has been published by the end of 2019.

We mention that both the 2018 Progress Report and the 2019 Progress Report failed to report on the fulfilment of this action, although their deadline expired by the end of 2019, without any other adjustments being made to the Action Plan. *In the light of the foregoing, the Promo-LEX Association qualifies **this sub-action as partially fulfilled.***

²⁰ <https://bit.ly/2YFdvD>

²¹ <https://bit.ly/2Kffi2s>

²² <https://bit.ly/2xIQXz>

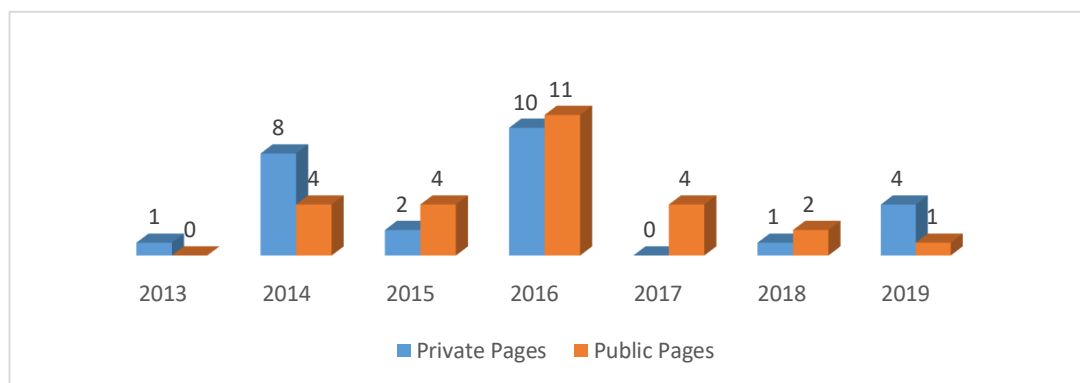
Based on the Plan on external communication one of the methods is online communication, namely communication via social networks. As the situation has been described at the time of drawing up the Plan, GIP, NPI, PD of Chisinau municipality, but also some territorial police inspectorates have official accounts opened on Facebook social network. Communication on Facebook is sporadic and chaotic, often the messages placed being long and unattractive to the target group. As identified solutions were listed the following:

- Messages on social networks will be short, clear, which should attract interest, provide brief and up-to-date information and prompt the reader to action;
- Campaigns/activities to promote police Facebook accounts to be carried out;
- Reducing the number of Facebook accounts in order to increase their impact and focus the number of visitors on a few accounts, etc.

Promo-LEX monitors identified and tracked the *Facebook* pages in order to assess the number of pages and posts published by police territorial subdivisions (Annex no. 2). 52 existing pages were identified and inspected, half of which are private pages (created by natural persons), and half - public pages, the following being noted:

- at least nine police subdivisions have two Facebook pages. These are as follows: Anenii-Noi PI, Drochia PI, Edinet PI, Floresti PI, Nisporeni PI, Ocnita PI, Riscani PI, Singerei PI, Vulcanesti PI.
- 23 Police Inspectorates have private pages, while 26 subdivisions have public ones. Out of public pages, the pages of Chisinau mun. Police Directorate, Nisporeni PI, Buiucani (Chisinau) PI, Ungheni PI, Strasenii PI got the most likes.

Chart no. 7. Pages belonging to Police territorial subdivisions broken down by the date of creation



Thus, we see that the number of accounts created during the 2017-2019 period is lower, but the total number has increased, contrary to those proposed in the Police Communication Plan. It was also assessed whether the Facebook pages contain general information about the subdivision, whether the contact details are displayed and whether the page is still active in 2019. The findings are presented in the table below.

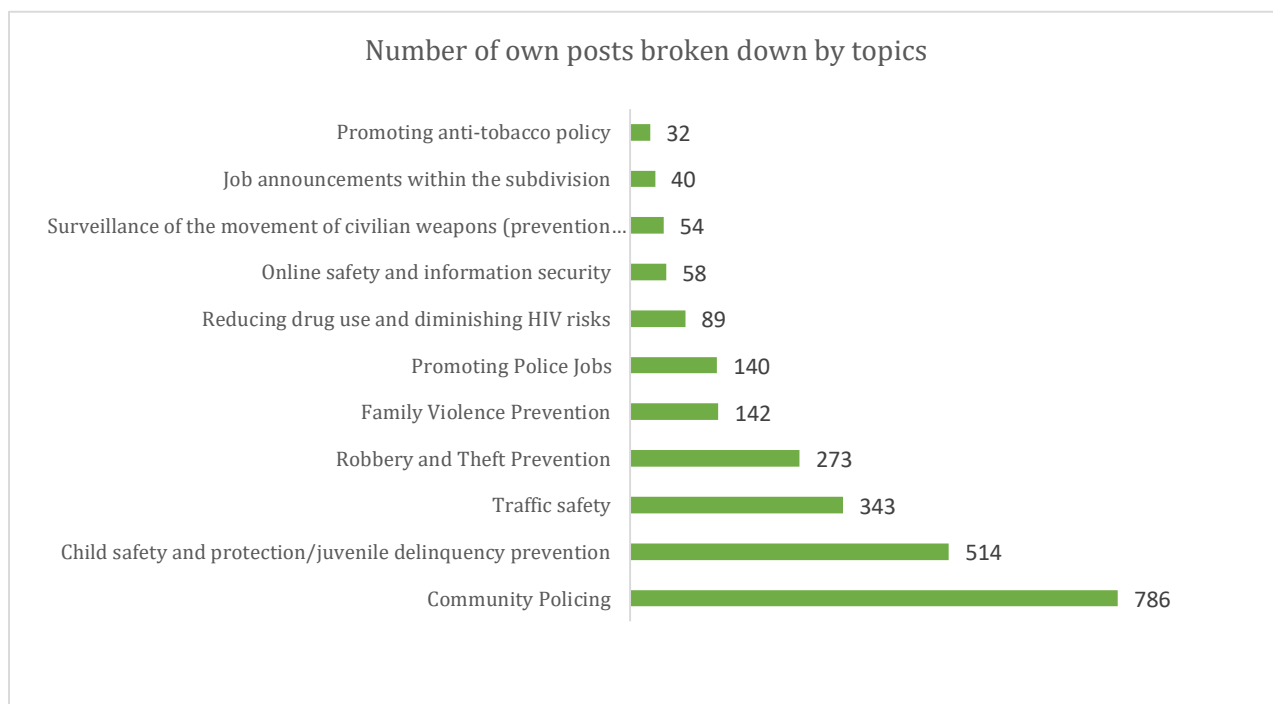
Table no.1. Transparency of Facebook pages

Criterion	Yes	No
Displaying the information about the subdivision on the page	30	22
Displaying the contact details of the subdivision on the page	24	28
Page's activity log in 2019	44	8

Regarding the analysis of the posts made, Promo-LEX monitors counted 5766 posts made in 2019, of which 40% - posts distributed on the Facebook page of the police or other subdivisions, or from the media, 60% - own posts.

Of the total of its own posts - 581 cover operational information (incidents, wanted persons, road accidents), and 2445 cover information, awareness raising, prevention or combating of certain phenomena campaigns. The most frequent posts relate to community policing, child safety and protection/ juvenile delinquency prevention, as well as traffic safety.

Chart no. 8. Topics of own posts and their number



The most active Facebook pages in 2019, among those observed by Promo-LEX monitors, were the pages of the following subdivisions:

- Briceni PI (private account)
- Nisporeni PI (public account)
- Chisinau mun. PD (public account)
- Dubasari PI (private account).

In addition, we mention that between 13-15 November 2019, with the support of Promo-LEX, the public communication training was organized to support the police reform, conducted by two trainers from Romania for employees of the GIP. The aim of the training was the delivery of communication skills, by understanding the role of the GIP in public space, developing the ability to build messages, developing the ability to work with the press, understanding how key messages are declined in various communication tools, developing skills on the social media area. After conducting the training, the trainers highlighted that other essential needs as regards the communication in the GIP are:

- Development of a communication strategy and related plan, including topics; messages; events and including communication solutions and strategic positioning of the reform process itself;
- Training with key staff to implement and communicate the reform to understand what they need to do to communicate effectively on the subject;
- Training with decision-makers in senior positions, to understand certain rules of communication and how to work with press officers;

- Additional training/exercises regarding the message building and development of appropriate content for social media;
- Crisis communication Training;
- Exercises/training on the area of the relationship with the press, starting from case studies specific to GIP;
- Training in the field of emotional intelligence communication, including for officers and non-commissioned officers who have direct contacts with the community, in parallel with the development of a message package related to the specific activity, understandable by citizens.

Taking into account the findings of Promo-LEX monitors as well as those of trainers from Romania, we recommend developing a communication strategy, a related plan and its implementation, monitoring the activity of police subdivisions on social networks, eliminating inactive Facebook accounts, but which continue to use the name of a police subdivision, examining the possibility of replacing private accounts with public ones, promoting both a unique image and messages, examining the possibility of organising and conducting training courses according to the needs identified by the trainers.

1.4. Reorganization of the system of maintaining, ensuring and restoring public order

1.4.3. Deconcentration of activities for maintaining and ensuring public order at the level of territorial subdivisions of Police;

Performance Indicators: adjusted regulatory framework for maintaining and ensuring public order, enhanced capacities of the territorial subdivisions for maintaining and ensuring public order

Timescale for completion: 2016–2017

According to the progress report for the implementation of the PDS, on March 29th, 2019, at the meeting of the Operational Council, proposals for the optimization of the GIP subordinate services were submitted, as follows:

- presentation of the concept of reorganization of the activity of the detention and escort service;
- presentation of the vision of reorganization of territorial and regional operational management services;
- optimising the work of transport and road accident surveillance services;
- model structure of the police inspectorate in view of decentralization of patrol structures and operational reaction.

Following the endorsement of the GD no. 547 of 12.11.2019 on the organization and functioning of the GIP, the calculation of the personnel units needed to be transferred to the patrol services within the territorial subdivisions of the GIP was carried out, which would contribute to reducing the reaction time to emergency calls and ensuring the presence and mobility of police forces in the territory served for maintaining and ensuring public order.

Promo-LEX mentions that when requesting information from the GIP, regarding the reorganization of the NPI and the deconcentration of the patrolling subdivisions, including on the competences assigned to territorial subdivisions, as a result of the reorganization, the General Inspectorate of Police mentioned that currently, the NPI personnel status is in analysis process and subsequent approval at the State Chancellery. Until the approval of the new structure, the NPI operates according to the functions and competences specified in the existing regulations on its organization and functioning, while during 2019, 149 personnel units were allocated to territorial patrolling subdivisions in order to strengthen functional capacities and ensure operational reaction to emergency calls of citizens.

*In the light of the foregoing, the Promo-LEX Association further qualifies this sub-action as **unfulfilled**, however the new Regulation on the organization and functioning of the GIP has been approved therein, deconcentration of activities for maintaining and ensuring public order at the level of territorial subdivisions of Police did not take place. In this regard, we recommend the implementing institutions making of all reasonable efforts to efficiently achieve the sub-action 1.4.3.*

1.4.7. Creation of appropriate conditions for continuous training of units specialized in maintaining public order;

Performance Indicators: Developed infrastructure, Suitable conditions for continuous professional training granted

Timescale for completion: 2017–2020

According to the progress report for the implementation of the PDS, during 2019, the following infrastructure works were carried out in the „Stefan cel Mare” Police Academy:

- an open-air football pitch was built within the limits of recognized standards, using modern technologies and quality materials. Also, the territory adjacent to the football pitch was arranged, the open-air runs were designed, both the park and access ways were rehabilitated.
- the gym hall together with 2 changing rooms equipped with sanitary facilities, each have been renovated.
- a kitchen-dining room was repaired and rebuilt, being equipped with furniture and modern home appliances.

Also, during 2019, the capital reconstruction works of Dinamo swimming pool continued.

The Promo-LEX Association points out that there is uncertainty concerning the use of this infrastructure for organizing continuous training of units specialized in maintaining public order, however the previous progress reports noted that with the establishment and development of JLETC (2019-2020), adequate conditions will be created for the continuous training of the units specialized in maintaining public order.

We note that until the end of 2019, the construction works of the JLETC infrastructure have not started, nor has the acquisition of the construction services been completed. *In connection with the delay in the development of the JLETC infrastructure and implicitly of the infrastructure necessary to create the appropriate conditions for the continuous training of the staff of the units specialized in maintaining public order, the Promo-LEX Association draws attention to the risk of failure to fulfill the sub-action hereof.*

On the same lines, according to the GIP, the training of police employees is a continuous activity being carried out on the platforms offered by the dedicated subdivisions of the Ministry of Internal Affairs - CSC Dinamo (central sport club), Border Police Training Institutions and the Police Academy "Stefan cel Mare" of the MIA, holding an adequate infrastructure for providing the officials with special status in all the MIA subordinated institutions with the required training.

1.4.8. Consolidating intervention capacities by providing special equipment and technique to the police subdivisions responsible for maintaining and ensuring public order.

Performance Indicators: needs assessment report developed therein. Special equipment and technique purchased.

Timescale for completion: 2017–2020

According to the report for the implementation of the PDS, during 2019, including in the context of the Budget Support for Police Reform:

- 1) 25 vehicles were re-equipped, flashing lights were installed, as well as services for re-equipping the the passenger compartment and applying the color and graphic scheme were performed.
- 2) special means were purchased such as: tear gas spray, tear gas, smoke, audiovisual grenades, stun grenades, disposable handcuffs, electric shock batons (stick flashlight), stun gun (Taser), spare cartridges.

Taking into account the purchases and endowments made in the years 2016 and 2019, Promo-LEX submitted to the address of the territorial subdivisions, requests for information on the assessment of the share of the endowment with special equipment and uniforms of women and men within the police inspectorate and the police stations under their responsibility. Following the analysis of the answers received (Annex no. 3), Promo-LEX notes that the level of endowment of the territorial subdivisions is different: from 14 % within Leova PI, 35 % - Telenesti PI to 100% within Cahul PI and Falesti PI. At the same time, although efforts are being made to equip police personnel, it was mentioned that in Taraclia PI the term of use of the uniform has expired, while in Edinet PI, from 2014 up till now, the personnel was equipped neither with office uniform nor with spring-summer shoes.

Contrary to those reported, according to the GIP, on the basis of data collected from official documents (such as contracts, other bookkeeping documents) the share of uniforms provided to the staff of police inspectorates varies between 74%- Taraclia PI, 85%- Rezina PI, up to 100% - Falesti PI, Nisporeni PI, Telenesti PI (Annex no. 3). On the same lines, in the case of Taraclia PI, of all police uniforms and equipment with unexpired term of use at the disposal of the staff of Taraclia PI only 65 % have been provided with summer patrol uniforms; 74 % received spring-autumn patrol uniforms; and 65% received winter patrol uniforms.

Also, according to the GIP, due to the insufficient financial resources granted for the purchase of the equipment during the period from 2016 to 2019, the employees of the subdivisions of the General Inspectorate of Police have been provided only with patrol uniforms taking into account the nature of duties performed by them, which mostly takes place in the territory, while utility uniforms have been provided to the employees performing desk jobs.

Building on the above findings, Promo-LEX recommends annually evaluating the share of actual equipment and special technical devices granted to the GIP employees, allocating sufficient financial resources with a view to ensuring full provision of uniforms to the territorial subdivisions and clear assessment of the needs of police personnel. In addition, we reiterate the recommendation on the presentation of the results of the intervention capacity as a result of the provision of special equipment and technical devices, at least at the end of the implementation of this action.

1.5. Consolidating the capacities of the Police to ensure road safety

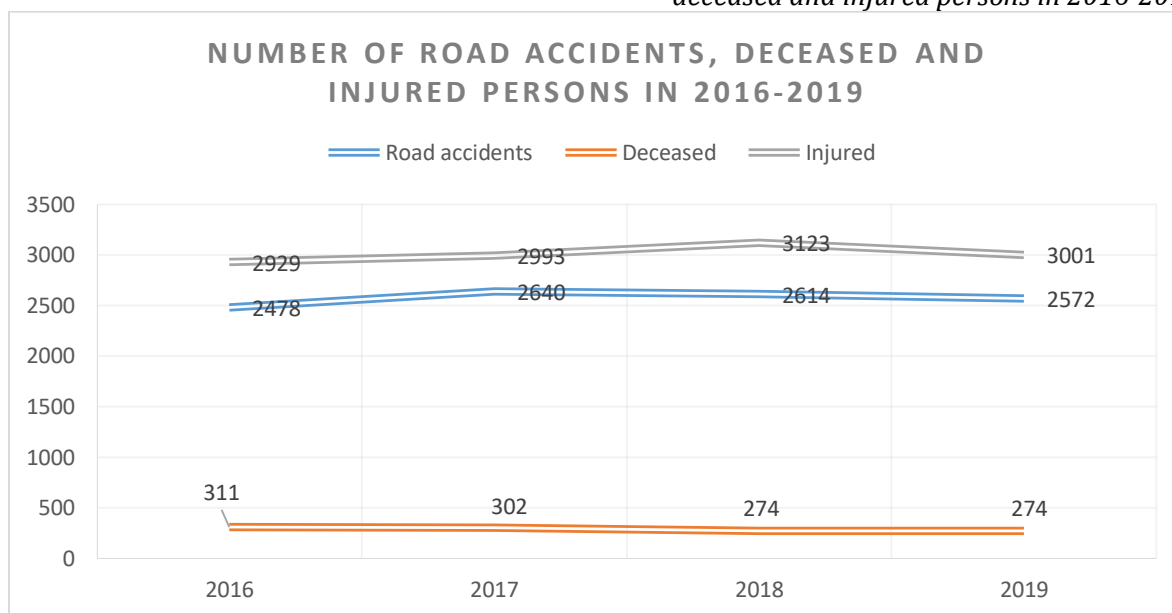
1.5.2. Improving the quality of documentation of road accidents resulting in victims

Performance Indicators: statistical data on the quality of road accident documentation in positive dynamics, equipment purchased

Timescale for completion: 2017–2020

During 2019, 2 572 road accidents were registered, as a result of which 274 people died, while 3 001 were injured, with a decrease of 1.6% in the number of road accidents registered therein as well as a decrease of 3.9% in the number of injured persons. The number of deceased people remained unchanged compared to the analog period of 2018, being 274 people.

Chart no. 9. Number of road accidents, deceased and injured persons in 2016-2019²³



Of the total of 2572 road accidents, criminal cases were initiated for 920 road accidents, resulting in 204 deaths and 296 injured persons²⁴.

In response to the request for information submitted by Promo-LEX to the GIP, to the question about the number of reports on road accidents challenged in the court in 2019, as well as the number of reports cancelled by the court, was reported that according to the data recorded in the “Registry of contraventions and applied penalty points” Automated Information System during 2019, there have been registered 18 163 contraventions provided for in art. 242 of the Contravention Code. Of these, 182 reports on contravention have been drawn up under art. 242 of the Contravention Code, submitted to the court for examination, of which 3 reports have been cancelled.

²³ Source: Statistica.gov.md, NPI report on road accidents for the period 01.01.2018- 31.12.2018, Information Note on road accidents for the period 01.01.2019 – 31.12.2019 <https://bit.ly/2IRFM8x>

²⁴ According to the statistics of offences registered by the MIA in 2019. Go to the link: <https://bit.ly/2IZlb1W>

Table no. 2. Number of contraventions registered under art. 242 of the Contravention Code, reports challenged in court and, respectively, number of cancelled reports, according to the data provided by the GIP

Year	Number of contraventions recorded	Number of reports - challenged in the court	Number of reports cancelled
2017	18 934	789 (4. 16%)	128 (16. 22%)
2018	18 446	755 (4. 08 %)	52 (6. 88%)
2019	18 163	182 (1%)	3 (1.64%)

Analyzing the data presented in the table above, the Promo-LEX Association finds that there is a considerable decrease in the number of reports cancelled by the courts, involving violation of traffic rules that resulted in deterioration of material goods or in slight bodily injuries, under art. 242 of the Contravention Code. However, we will reiterate that these data do not fully reflect the quality of documentation of road accidents resulting in victims. Art. 264 of the Criminal Code stipulates cases of violation of traffic rules or exploitation of means of transport by the person who runs the means of transport and, respectively, causes average damages to bodily integrity or health. In this regard, no statistical data have been presented on the quality of documentation of road accidents that resulted in average injuries of bodily integrity or health or resulted in deaths. Also, although the accident rate information note for the period from 01.01.2019 to 31.12.2019²⁵ has been published on the website of the Police, it does not include any information on the quality of documenting the road traffic accidents.

At the same time, according to the GIP, 6 vehicles of which 4 of Dacia Duster model and 2 of Dacia Logan model have been purchased and transmitted with a view to enhancing the capacities of documenting the road traffic accidents to the unit within Chisinau mun. PD.

*Taking into account the above, the Promo-LEX Association repeats its recommendation for the inclusion of **statistical data on the quality of road accident documentation** in the progress report for the implementation of this sub-section, as provided by its performance indicator. At the same time, we note that in this sub-action in the Report for the implementation of the PDS, the purchase of the equipment was not reported, although the performance indicator provides it, while the purchase of vehicles, in the opinion of Promo-LEX, aims to enhance the mobility thereof, and not to improve the quality of documenting the road traffic accidents involving fatalities.*

1.5.5. Increasing the mobility of road safety crews

Performance Indicators: equipment purchased therein

Timescale for completion: 2018–2019

According to the progress report for the implementation of the PDS, at the end of 2019, 6 means of transport were purchased for the road accident documentation service within the Police Directorate of Chisinau municipality, which will replace the defective means of transport, in order to increase the mobility of the teams in the process of documenting the road accidents.

Taking into account the purchases carried out both in 2018 and in 2019, Promo-LEX Association notes that the 16 means of transport purchased and made available to the structures for prevention, combating the road events and documenting the road accidents, could increase their mobility. However, we reiterate that in the absence of a report on the entity's need for equipment to increase the mobility of the road safety crews, but also in the absence of a report in percentage value of the level of endowment, as previously recommended, it is difficult for the Association to

²⁵ <https://bit.ly/2KHbCWj>

assess the degree of accomplishment thereof, due to the fact that the sub-action is generally formulated, while the performance indicator is immeasurable.

1.5.6. Improving the management of road accident documentation through the use of information technologies.

Performance Indicators: Management of road accident documentation provided by the use of information technologies

Timescale for completion: 2018–2020

It should be noted that the implementing institutions in the Progress Report on the implementation of the PDS in 2019 did not reflect information on the documentation of road accidents through the use of information technologies, but only presented statistical information on contraventions and offenses found in 2019.

In this regard, we note the omission of reporting with relevant information of sub-action 1.5.6. and we recommend the proper implementation and reporting of the activities in order to implement the previously mentioned sub-action.

At the same time, we reiterate that according to the Strategic Development Program, the expected result is a system for documenting road accidents through operationalized information technologies and training of 100% of employees of the traffic safety subdivisions in applying the new operational model.

According to the GIP, the steps undertaken over the preceding years (such as the approval of both legal and regulatory framework for the amicable detection of road traffic accidents, purchase and provision of forensic equipment and kits including the one required for performing the investigation of the crash scene, purchase of two devices for mapping both the crash scene and site) express the commitment of the changes undertaken. However, the implementation of new technologies involves long stages of study, piloting, testing and assessment on the need to broaden the provision of such equipment at the Police level.

*The Promo-LEX Association welcomes the efforts undertaken to improve the management of documenting the road traffic accidents, however reiterating the need for ensuring the fulfillment of the sub-action no. 1.5.6. in the sense formulated by both the sub-action and indicator thereof in particular on improving the management of documenting the road traffic accidents by **using information technologies**.*

1.6. Increasing the efficiency of the Police by applying the concept of equal performance.

1.6.1. Improving the infrastructure and logistical capabilities of the Police to fulfil the tasks established by law.

Performance Indicators: developed infrastructure.

Timescale for completion: 2017–2020

According to the Progress Report for the implementation of the PDS, the following achievements were made in 2019:

- 9 provisional detention isolators have been renovated and inaugurated;
- 63 police stations were designed, of which 14 were inaugurated;
- 25 special cars for transporting persons in police custody transmitted for use to territorial units;
- 30 mobile forensic autolaborators to investigate the crime scene transmitted for use to territorial units;
- transport units were provided to police stations, prosecution officers, investigation officers;

- Calculation technique for Investigation Services and Police Stations has been purchased/distributed;
- TETRA standard secure communications network built;
- system body worn camera purchased with 100 body camera equipment purchased for the National Patrol Inspectorate and the Office of operative response;
- Car fleet monitoring system (GPS Monitoring) purchased/installed.

The Promo-LEX Association reiterates that the formulation of both sub-action and the performance indicator are too general and unmeasurable, which makes it difficult to assess the degree of fulfilment of sub-action no. 1.6.1. Moreover, a large number of sub-actions in the Action Plan on the implementation of the PDS (1.4.8, 1.5.5, 2.1.3, 3.1.1, 3.1.7, 4.1.5, 4.2.5, 4.2.8) aim at developing the infrastructure, with the same activities being carried out and/or procurements being reported. In this sense, Promo-LEX further recommends avoiding the practice of reporting the same activities in two different sub-actions.

1.6.2. Development of standard operating procedures for the activity of the Police.

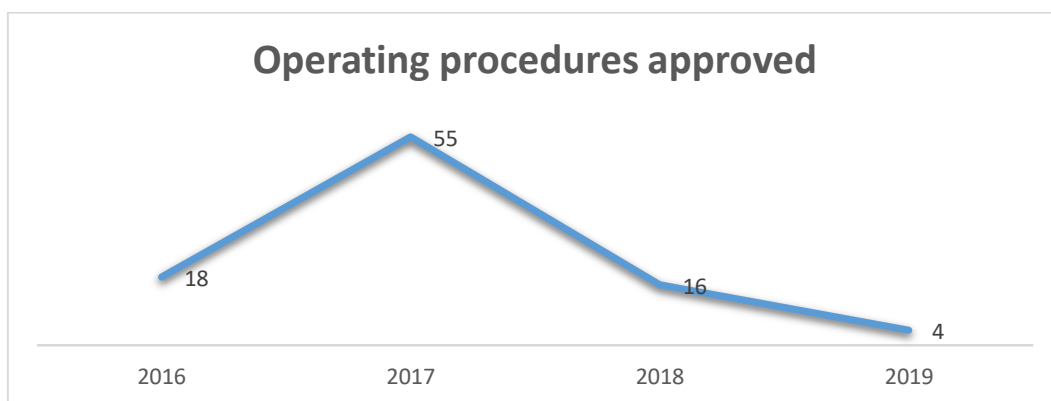
Performance Indicators: standard operating procedures elaborated, approved and applied.

Timescale for completion: 2017–2020

According to the Progress Report for the implementation of the Police Development Strategy, in 2019, 4 standard operating procedures have been approved in addition to the existing 89 procedures approved up to 2019. The aforementioned procedures cover the following fields: techno-forensic, rapid response (intervention with some categories of persons/situations), operational management (including PDIs), human resources, investigation, legal, internal audit, Security Zone, as well as other fields.

We note that the number of operating procedures approved in 2019 is the lowest of all the years of implementation of the Police Development Strategy.

Chart no. 10. *Number of operating procedures in 2016-2019*



The Promo-LEX Association further recommends both the development and approval of the required standard operating procedures, especially in the context of the reorganization of the General Inspectorate of Police and establishment of a new structure under the institution, as well as adaptation or modification of the standard operating procedures, where necessary. Promo-LEX also reiterates that in addition to the development and approval, the standard operating procedures need to be applied, and the monitoring of their uniform application must be ensured by the heads of subdivisions. In order to streamline and stimulate the application of standard operating procedures, it would be appropriate and advisable to establish a mechanism to verify the application and knowledge of standard operating procedures by the persons in charge of this, but also proper reporting of the application of the procedures thereof by the implementing institutions.

1.6.3. Consolidating the operational management by clearly establishing the domain and creating a complex system to ensure decision support based on an integrated information operations management system.

Performance Indicators: Developed competences, implemented complex system for ensuring decision support

Timescale for completion: 2017–2020

According to the 2019 Police Activity Report, one of the achievements of the institution is the approval of **the Concept on consolidating the operational management capacities of the Police and complementary competences unfit for the field thereof for the years 2019 to 2021**. It should be noted that this concept is not available in public space, which is why it becomes difficult to assess the degree of compliance of this concept with the sub-action no. 1.6.3.

Furthermore, it should be mentioned that on 27.02.2019 the Operational Management Inspectorate was constituted as an administrative authority under the Ministry of Internal Affairs, with the legal organizational form of inspectorate, only approved in July 2019, the time when the institution became operational. By the aforementioned Government Decision, the Regulation for the organization and operation of the Operational Management Inspectorate was approved, while according to section 10 of the Regulation thereof, the Inspectorate also has the decision support function - by ensuring the substantiation of decisions made by the MIA management in the process of achieving integrated management of the forces and means of the subdivisions within the Ministry of Internal Affairs.

We specify that although the activity analyzed is a continuous one, the implementing institutions have failed to report on the implementation of this action both in 2018 and 2019.

1.6.6 Periodic adjustment of police structures considering the evolution of European standards and criminal trends

Performance Indicators: analytical reports on crime phenomenon developed therein; structure that is periodically adjusted.

Timescale for completion: 2016–2019

According to the progress report on the implementation of the PDS, the following types of reports were prepared in 2019:

- 125 Operational Review Reports on criminal cases managed by NII, General Directorate of Criminal Investigation, Prosecutor's Office employees;
- 70 tactical analysis reports: analysis of crime status for 2019, analysis of crimes committed by minors, analysis on crime accompanied by violence, road accidents, etc.;
- 3 reports on the state of crime against the life and health of the person, committed in the sphere of family relations;
- analytical report on the state of crime on the territory of the Republic of Moldova during the first semester of 2019;
- 2 reports on cases of threats recorded through the "Threat Map" application in the 1st semester of 2019 as well as in the 3rd quarter of 2019.

In the light of the foregoing, and also considering the approval of the new structure of the General Inspectorate of Police only on 12.11.2019²⁶, with effect from 22.12.2019, the Promo-LEX Association considers that the periodic adjustment of police structures considering the evolution of

²⁶ <https://bit.ly/3bN4sLY>

*European standards and criminal trends, was not possible, however the GIP reorganization was expected to be achieved under the Action Plan for the implementation of the PDS between 2016 and 2017. At the same time, we mention that the performance indicators are too general and unmeasurable, the reason why makes it difficult for the Promo-LEX Association to objectively assess **the achievement** of this sub-action.*

1.7. Consolidating the capacities of the Police to participate in international missions and EU crisis management operations.

1.7.1. Elaborating a departmental framework to regulate the participation of the Police in international missions and EU crisis management operations;

Performance Indicators: Developed and approved departmental regulatory framework

Timescale for completion: 2017–2020

According to the progress report on the implementation of the PDS, in line with the Government Decision no. 332 of 18.07.2019 on the organization and operation of the General Inspectorate of Carabinieri within the central apparatus was created the Directorate of Cooperation and International Missions.

In order to carry out the MIA Order no. 43 as of February 16th, 2018, on the approval of the Regulation on the recruitment, selection, training, appointment, and participation of MIA staff to the international mission, by the effective of the Division newly created, it is planned to develop GIC Regulations on the participation of the carabinieri in international missions, as well as providing further training for them.

*Promo-LEX draws attention to the fact that both the sub-action 1.7.1 and the action 1.7 relate to **facilitating and ensuring Police participation in international missions and EU crisis management operations**, which is why it is recommended that implementing institutions report on the actions taken with a view to the proper implementation of the sub-action thereof. Also Promo-LEX reiterates that considering the fact that no report for the development of the normative framework on documents to be elaborated and approved for the participation of Police employees in international missions and EU operations has been published, it will be difficult to evaluate the degree of fulfilment of this sub-action. In this regard, we recommend evaluating the fullness of the existing regulatory departmental framework and publishing or including in the Annual Progress Report the results of this evaluation.*

1.7.2. Development of the mechanism to ensure participation in international missions and EU crisis management operations

Performance Indicators: Mechanism developed and implemented

Timescale for completion: 2016–2017

According to the progress report on the implementation of the PDS, the achievement of the sub-action hereof was not reflected. It is necessary to recall that according to the 2017 Report for the implementation of the PDS, the MIA Vision of participation in international missions and operations was elaborated and approved by the Order of the MIA no. 233 of August 03rd, 2017, which includes clear and concrete activities for the four years of implementation of this objective. We mention that the MIA Vision of participation in international missions and operations has not become available in the public space neither in 2019.

On the same lines, according to the implementing authorities, the mechanism of ensuring the international missions and EU Crisis Management Operations has been established by Law no. 219 of 03.12.2015 on participation of the Republic of Moldova in the international missions and operations. Therefore, by the MIA Order no. 43 of 16.02.2018 the Regulation on the recruitment,

selection, training, designation and participation of the MIA staff in international missions and operations has been approved, the latter setting out the institutional mechanism of participation in both international missions and operations.

According to the GIP, during 2019 the following requests for the nomination of participants to international peacekeeping missions were received:

- Request from the International Cooperation Department of the MIA for participation in the United Nations Multidimensional Integrated Stabilization Mission in the Central African Republic (MINUSCA);
- Request from the Staffing and Education Policies Directorate of the MIA for participation in the Mission of the United Nations Integrated Office in Haiti (BINUH);
- Request from the Staffing and Education Policies Directorate of the MIA for participation in the European Union's Civilian Mission under the Common Security and Defence Policy to support the internal security forces in Africa (EUCAP Sahel Mali);
- Request from the Staffing and Education Policies Directorate of the MIA to participate as an expert in the Panel of Experts on Libya and Panel of Experts on the Central African Republic.

However, no eligible candidates to participate in the three United Nations peacekeeping missions and in one European Union peacekeeping mission were identified.

The section 16 of the Regulation on the recruitment, selection, training, designation and participation of the MIA staff in international missions and operations, provides that, within five working days of the date of receipt of the decision of the Ministry of Foreign Affairs and European Integration, the International Cooperation Department shall publish on the MIA website the announcement on the opportunity to participate in an international mission or operation, indicating the deadline for the submission of participation dossiers. Promo-LEX states that no announcement for the aforementioned international missions has been published on the website of the Ministry of Internal Affairs, in the section of Careers - Vacancies in international missions and operations. The last announcement has been published on 29.05.2018.

*In the light of the foregoing, it appears that there is a mechanism for ensuring participation of police officers in international missions and operations, however both failing to publish the announcements on the opportunity to participate and nonparticipation of police officers in such missions and operations shows that the mechanism thereof has not been implemented in 2019 either. Thus, the Promo-LEX Association qualifies the **sub-action 1.7.2 as partially fulfilled and reiterates its recommendation on the efficient implementation of the mechanism for ensuring participation in international missions and EU crisis management operations, which should result in the participation of Police in the aforementioned missions.***

1.7.3. Development and approval of a curriculum to train the staff selected for participation in international missions

Performance Indicators: curriculum approved; organized and conducted training.

Timescale for completion: 2016–2017

According to the report on the implementation of the PDS, in 2019, the employees of MIA attended the following courses in the field of reference:

- CSDP course 25-29 November, Turin, Italy - Security Sector Reform, including module on participation in international missions - 2 persons;
- training course in law enforcement and international missions for capacity building "LET4CAP", 17-23 February 2019, in Vicenza, Italy - 2 persons;
- training course Conflict Analysis in the field of Common Security and Defence Policy (CSDP), 31 March-05 April 2019, Yerevan, Republic of Armenia - 1 person.

*The Promo-LEX Association points out that in 2018 the Curriculum for basic training of carabinieri has been developed and approved, although a curriculum for training of Police employees for the same purpose, is still missing in 2019. Taking into account both the sub-action and the reference indicators including on the organization and carrying out of the training with regard to the Police participation in international missions, we further qualify **the sub-action 1.7.3. as unfulfilled**. At the same time we repeat our recommendation on the implementation of all planned actions, even if the deadline for performing them has expired.*

Based on the Policy Matrix

A. 1.1. Improving Human Resources System in order to ensure transparent and merit-based selection, assessment and promotion procedures

2019 Indicator: all regional Human Resources Management Units (HRM) apply the human resources management single procedure.

The Report approved by the MIA²⁷ containing information on the final version of the Human Resources Management (HRM) Single Handbook intended for the Police and the trainings conducted to inform the employees on both the provisions and content of the aforementioned Handbook have been published on the Police website.

According to the report, the 2019 achievements were as follows:

- The Human Resources Single Handbook²⁸ has been developed and approved under MIA Order no. 646 of 09.10.2019.
- Two training sessions have been organized for delegated employees working in Human Resources Services, 100 employees of 38 territorial and specialized units receiving training.

At the same time, all human resources management units have been granted time to familiarize themselves with and apply the aforementioned handbook at work, while for assessing the way and level of understanding and application thereof, there will be organized visits in some subdivisions of the police to assess the human resources management sole procedure, recruiting process and granting the methodical and practical assistance.

We note that, in accordance with the performance criterion set for 2018, all human resources units had to be regionalised, and thereafter in 2019 sole application of the human resources management had to take place in five regional units, which proved not to be the case. For this reason, it is difficult for all territorial subdivisions to ensure the sole application of human resources management in 2019.

The Promo-LEX Monitors conducted interviews with representatives of human resources services operating within the territorial subdivisions of the police. According to the results of the interviews conducted therein²⁹, the 2019 seminar on the Human Resources Management Single Handbook has been attended as follows:

²⁷ <https://bit.ly/3dle38q>

²⁸ <https://bit.ly/2UDaokl>

²⁹ With the exception of Police Inspectorates under Chisinau and ATU Gagauzia Police Directorates as they don't have human resources services.

Table no.3. Persons who have received training on the HRM Single Handbook

Number of persons working in the Human Resources Services in the PIs who have attended the seminar	Number of Police Inspectorates	List of Police Inspectorates
0 persons	4	Briceni, Criuleni, Donduseni, Singerei
1 person	7	Bender, Cimislia, Drochia, Edinet, Leova, Taraclia, Telenesti
2 persons	10	Basarabasca, Cahul, Floresti, Hincesti, Orhei, Rezina, Riscani, Soroca, Stefan- Voda, Strasen
3 persons	9	Anenii Noi, Calarasi, Cantemir, Causeni, Falesti, Glodeni, Ocnita, Soldanesti, Ungheni
4 persons	2	Ialoveni, Nisporeni
5 persons	1	Balti
No information available	1	Dubăsari
Total: at least 67 persons employed with PIs (68.9%) received training, of the total of 137 persons employed with the Human Resources Services, according to Payroll and Job Description Schedule.		

Concerning the question on whether the human resources management single procedure, started to be applied, 31 of the respondents answered in the affirmative, 2- answered in the negative, while one person answered that he/she does not have such data.

At the same time, concerning the question on the date of application of the human resources management single procedure, respondents provided different answers:

- "as from 2013" (one person);
- "as from 2017"/"May 2017"/"according to the GIP Order no. 451 of 13.11.2017" (3 persons);
- "2019, since the single procedure has been established" (3 persons);
- "May 2019" (one person)
- "October 2019"/"since the guide has been approved"/"from the date of the adoption"/"09.10.2019" (5 persons)
- "November-December 2019"/"immediately after the training"/"the end of 2019" (6 persons)
- "January 2020"/"2020" (5 persons)
- "February 2020" (one person)
- "do not know"/"can't recall" (3 persons)

Although the vast majority of respondents have indicated that they have started to implement the human resources management single procedure in the 2019-2020 period (75%), Promo-LEX finds that there is a unique perception on the procedure and effective implementation period thereof.

*In light of the foregoing, we note that **the human resources management single procedure started to be applied partially in 2019**, although its application is also linked to the date of adoption of the Human Resources Single Handbook, which is October 2019, while training seminars have been conducted in November-December 2019.*

Referring to the indicator set for 2020 within the A.1.1 action on the ratio of 40% officers/ 60 % non-commissioned officers, when asked, the persons in charge of the Human Resources Services in the police inspectorates, whether they know about the inversion of the jobs' pyramid, 33 persons stated that they know about it and only a person answered that he/she does not know anything about it. At the same time, on whether in their opinion will be possible to achieve the ratio 40% officers and 60% non-commissioned officers, 11 (32.35%) respondents answered in

the affirmative, 17 (50%) replied in the negative, 4 (11.76%)- stated that they do not know anything about it, while 2 respondents avoided answering this question.

On the same lines, according to the GIP response no. 34/57-844 of 26th of March 2020, pursuant to the provisions of art. 12¹ of Law no. 288/2016 the modalities for the transfer from the position of officer into non-commissioned officer were due to be approved under the Government Decision, which was not the case, although the draft GD has been endorsed by the GIP Human Resources Department in May 2019. Therefore, the GIP is unable to perform the inversion of the jobs' pyramid and reach the ratio of 40% officers/ 60% non-commissioned officers where there is no regulation approved in this matter.

Contrary to the aforementioned provision, according to the Ministry of Internal Affairs, the regulatory framework for transfer is ensured under section 37¹ introduced in 2018 in the Regulation on the career progression of civil servants holding a special status within the Ministry of Internal Affairs³⁰. This norm provides that the civil servant with special status shall maintain his/her special rank in the event of transfer, (...) regardless of the level of professional seniority of the position assigned to him/her. When calculating the term for granting the next special rank, the term in the previous special or military rank until termination of office held within the Ministry of Internal Affairs or in any other national defense, state security or public order bodies shall be taken into account.

However, it appears that the mechanism for the transfer from the position of officer into the position of non-commissioned officer, referred to in art. 12¹ of the Law no. 288/2016 was not applied, the reversal of jobs taking place only from the account of vacant positions.

When asked, the territorial subdivisions of the police, whether in 2019 the transfer from the position of officer into non-commissioned officer took place, 18 subdivisions replied in the negative, while three police inspectorates (Cantemir PI, Taraclia PI, Rezina PI) stated that the transfer of a person from the position of officer to non-commissioned officer took place. At the same time, the response sent by Balti PI and Ungheni PI indicated that in 2019, 10 positions of officers have been transferred to the positions of non-commissioned officers, whereas the latter became vacant, while 4 positions have been inversed in Ungheni PI.

Assessing the possibility of reaching the indicator on the ratio of 40% officers/60% non-commissioned officers towards 2020, Promo-LEX draws attention to the risk of not meeting the indicator thereof. In this connection, considering the aforementioned and also the large number of vacancies for non-commissioned officers as well as the moratorium imposed on the vacancies registered therein including the ones in the GIP, we recommend the implementing authorities to identify the best solutions which shall ensure both the reversal of jobs pyramid and reaching in so far as is possible the share set out in the Policy Matrix, as well as filling of vacant posts.

A.1.2. Increasing Female Participation in Policing

2019 Indicator: the overall share of female police officers rose to 18%

According to the Report for the implementation of the Budget Support Program, in 2019, among the main achievements under this action were listed as follows:

- at the end of 2019, the number of women in the police is 1772 (21.31%), including women who are on child-care leave (2.38%);
- the share of female police officers is 21.73%, of whom 2.85% are on child-care leave;
- the number of women promoted to managerial positions is 102 (i.e. 10.94% of the total number of managerial positions held therein - 932).

From a methodological point of view, we believe that the share of women in the police should be calculated out of the number of persons employed and those in active office, without taking into

³⁰ Approved by Government Decision no. 460 of 22.06.2017

account the number of persons whose employment contract is suspended for a variety of reasons (including the persons who are on a maternity/paternity leave/child-care leave). Usually, the positions of persons that are on a leave, are filled by other persons for a specified period, whilst merging these two categories, leads to the distortion of figures on the representation of women in the police.

Furthermore, according to the European Code of Police Ethics, (Explanatory Memorandum)³¹, “it is a fact that women in general are under-represented in the police in the EU member states, and this is much more visible in management and high level positions than in basic ones. A similar situation can be generally described for minority groups, including ethnic minority groups in the Member States. **It is considered that the relationship between the police and the society will benefit from the composition of the police, which will reflect that of the society.**”

Thus, we believe that the minimum percentage established for women in the police, must be representative and visible in society. For this reason, it is important that women be adequately represented, including, in the territorial structures of the police.

Upon request for information addressed to the GIP, the following figures of the composition of the institution were presented:

Table no. 4. *Composition of the staff in the territorial and specialized subdivisions of the GIP, to the situation at 31.12.2019, without considering the employees on a maternity/paternity leave/child-care leave³²*

Total number of employees		Number of officers		Number of non-commissioned officers		Number of persons holding managerial functions	
Women	Men	Women	Men	Women	Men	Women	Men
1244	6138	813	3892	360	2246	87	646
7382		4705		2606		733	

Thus, we note that the overall share of women employed with the territorial and specialized subdivisions of the police to the situation at 31.12.2019 is 16.85%, whilst **the share of female police officers is 17.28%.**

According to the GIP, the share of women in the Police must include not only women employed with the territorial and specialized subdivisions, but also women employed with the central managing and control unit of the Police (where about 50 % of the staff are women) who, depending on the necessity, are involved in all policing activities.

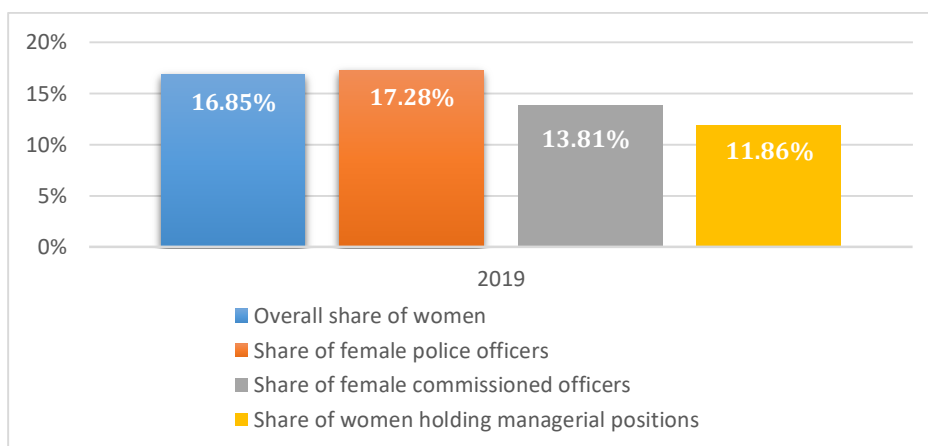
Starting from the limit staff of the central apparatus of the GIP in 2019 of 111 units³³, but also taking into account those highlighted by the GIP, we note that the share of women in the Police to the situation at 31.12.2019 was **17.34%.**

³¹ The European Code of Police Ethics, Recommendation Rex (2001) 10 adopted by the Committee of Ministers of the Council of Europe on 19 September 2001 and explanatory memorandum

³² According to the data provided by the GIP

³³ The new structure of the GIP has been implemented under the MIA Order no. 83 of 17th of February 2020 on the staffing plan of the GIP.

Chart no. 11. Share of women in territorial and specialized subdivisions of the Police in 2019



In the sense of representing women in the territorial and specialized subdivisions of the Police, we mention that the least representation to the situation at 31.12.2019, in percentage ratio is observed in the subdivisions of the Special Destination Police Brigade “Fulger”, Edinet PI, Dubasari PI, Floresti PI, with values between 3% and 8 % , while the highest representation is held by Cahul PI, Buiucani PI, General Directorate of Criminal Investigation (GDCl), the Technical-Forensic and Legal Expertise Centre (TFLEC), DCPI with values between 30% and 52%. (Annex no. 4)

*In the light of the foregoing, the Promo-LEX Association finds that in 2019 considerable efforts have been made to employ women in the Police, while the share of female police officers is close to the performance indicator set out in the Policy Matrix. However, building on the minimum share of female police officers indicated in the Objective A.1.2, we ascertain that the **performance criterion set for 2019 failed to be fulfilled**. In relation to the indicator set for 2020 – „minimum 15% of police officers are women,, and thus we note that this very indicator has already been achieved in 2019. In this connection, we recommend the implementing institutions ensuring for 2020 an increase in the number of women in the active office of Police, so as to reach the share of 20%, ensuring also the representative share in territorial subdivisions of the Police.*

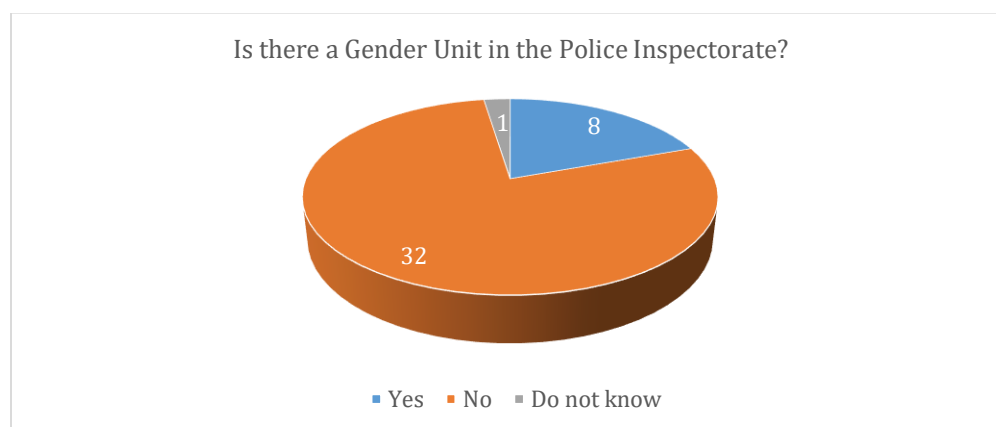
We further specify that both the progress report on the implementation of the 2019 Police Action Plan on increasing the share and role of women in the Police³⁴, and the Opinion of the Association of Women in Police on achieving the 2019 GIP Action Plan on increasing the share and role of women in Police for the period from 2018 to 2020³⁵ have been published on the Police website.

We note that according to the action no. 2.2 in the aforementioned Progress Report, 48 gender units have been nominated in the territorial subdivisions and some specialized subdivisions of the Police under internal orders, that will ensure the promotion of equality between women and men within the institution they work. According to the GIP, during September these gender units (1 person each) were created, 1/3 of whom received some trainings on gender equality. The Promo-LEX monitors have conducted interviews with the heads of police inspectorates, and when asked about the existence of a gender unit in the police inspectorate, 32 persons (78%) in the management of police inspectorates replied in the negative, and only eight of them (19.5%)-answered in the affirmative, whilst one person (2.43%) stated that he/she does not know anything about it.

³⁴ <https://bit.ly/3aBU8pH>

³⁵ <https://bit.ly/2wZYloL>

Chart no. 12. The Gender Unit



According to the GIP, the lack of knowledge by the heads of police inspectorates about the existence of gender units is also due to the employee turnover in the management of police units, which took place within territorial subdivisions, but also due to the level of training of gender units, for whom the tasks of promoting gender equality are still a challenge and need to be strengthened.

At the same time, between persons who have answered in the affirmative, when additionally asked about the date of the establishment, number of women and men in the gender unit, activities carried out in 2019 by the unit, three of the respondents declared that they do not have any data on this, one person stated that all employees of the police inspectorate are part of the Gender Unit, whilst 2 other persons mentioned that one person has been designated in each police inspectorate. As for the activities conducted by the gender unit in 2019, two persons stated that the representatives of the unit have attended seminars and trainings in this field.

While on whether in its opinion is there necessary/beneficial to have a gender unit in the PIs, 18 (43.9%) respondents answered in the affirmative, 16 (39%) replied in the negative, while 7 (17%) stated that they do not know.

In this respect, Promo-LEX concludes that gender units have been established under an internal regulatory instrument, however neither the management of police inspectorates, in large part, do not know anything about the existence and purpose of the unit, whilst half of the respondents do not think or do not know whether the existence thereof is necessary or beneficial within the police inspectorate.

A. 1.3. Improving the capabilities of initial and ongoing training, with an emphasis on human rights, modern management and anti-corruption techniques.

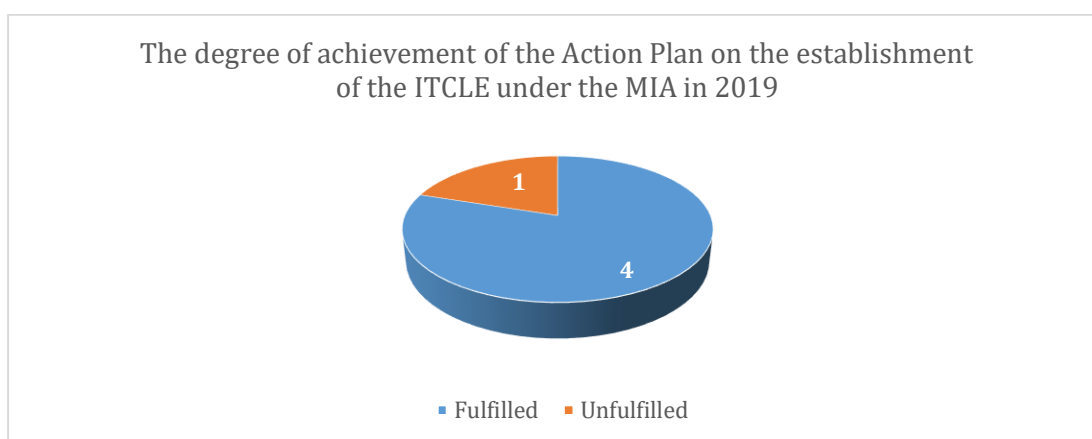
2019 Indicator: the Action Plan is implemented in accordance with annual indicators set in respect thereof, while the 16-week initial training course for non-commissioned officers (at least 50 participants) is conducted.

The progress report on implementing in 2019 the Action Plan on establishing the Joint Law Enforcement Training Centre(JLETC) of the Ministry of Internal Affairs has been published on the police website.³⁶

The degree of achievement of the aforementioned action plan under the progress report published on the police website is shown in the chart below.

³⁶ <https://bit.ly/2ynueaZ>

Chart no. 13. *The degree of achievement of the Action Plan on the establishment of the JLETC under the MIA in 2019, according to the progress report*



According to the report on the implementation of the Budget Support Program, the main achievements of 2019 in respect of the action A. 1.3 are the following:

- approval of both the Regulation for the organization and functioning of the Joint Law Enforcement Training Centre of the Ministry of Internal Affairs and the Strategic Development Program of the Joint Law Enforcement Training Centre for the period from 2019 and 2021.
- conducting the first training course for starting non-commissioned officers, and training of 55 non-commissioned police officers between 12.08.2019 and 6.12.2019;
- conducting ongoing training course for 378 police employees;
- initiating repeated procurement procedure for carrying out construction works of the JLETC.

*Considering the aforementioned, as well as the fact of conducting the 16-week initial training for 56 non-commissioned officers, Promo-LEX states that **performance indicators set for 2019 have been achieved.***

According to the GIP response, to the request for information submitted by Promo-LEX, non-commissioned officers instructed by the JLETC between August and December 2019 serve in Chisinau municipality Police Directorate, Botanica PI, Buiucani PI, Centru PI, Ceadir-Lunga PI, Comrat PI, Briceni PI, Cahul PI, Cantemir PI, Cimislia PI, Donduseni PI, Drochia PI, Floresti PI, Ialoveni PI, Orhei PI, Rezina PI, Riscani PI, Soroca PI, Straseni PI, Soldanesti PI, Stefan Voda PI, Taraclia PI, Telenesti PI, NPI.

At the same time, the Promo-LEX monitors have conducted interviews with the heads of police inspectorates, and when asked whether there are non-commissioned officers instructed by the Joint Law Enforcement Training Centre (JLETC) within the police inspectorate or police stations under its authority, 28 (68.3%) have answered in the affirmative, 11 (26.8%) replied in the negative, while 2 persons (4.87%) stated that they do not know anything about it. On the same lines, of those answering in the affirmative, 6 stated that they do not know the number of non-commissioned officers instructed by the JLETC in the PIs or police stations.

Of 28 respondents, 13 (46.42%) expressed the views that the training for non-commissioned officers conducted by JLETC is the same in relation to non-commissioned officers instructed by "Stefan cel Mare" Police Academy, 8 (28.57%) stating that it is better, while 7 (25%) declared that it is worse.

Additionally, Promo-LEX draws attention to the risk of failure to meet the indicator set for 2020, namely "operationalisation of JLETC in its components 2, 3, 4a, 4b, 4c, 5a, 5b, 6, 8a, 8b (which

corresponds to class rooms, lecture halls, auditories, dorms and hygiene facilities)", however by the end of 2019 no procurement procedure for the performance of such works was finalized, and respectively- no economic operator has been selected. We believe that the lack of JLETC infrastructure has also an impact on the quality of training courses conducted therein and that is why we recommend to the implementing authorities, making of all reasonable efforts in order to be awarded a construction services contract, but also to supervise the beginning of the works in the near term, or finding solutions agreed with the partners to amend the conditions for the implementation of the objective set.

OBJECTIVE 2: Fair efficient and effective application of human rights legislation in the activity of the Police.

Objective 2 also primary aims at increasing citizens' access to more qualitative police services; the emphasis being laid on respecting human rights in the activity of the Police. Quantitatively, the objective contains practically the fewest actions (2) and sub-actions (8).

According to the methodology, keeping in mind the Action Plan on the implementation of the PDS, six sub-actions have been assessed therein, of which: two have been previously assessed, being qualified as unfulfilled, while four are in the process of being implemented. No sub-actions under this Objective are expected to be completed for 2019. Both sub-actions assessed prior to 2019 remained unfulfilled during the reference year.

The Policy Matrix comprised a single action under Objective 2 with performance indicators to be achieved in 2019, which were qualified as partially fulfilled.

Based on the Police Development Strategy

2.1. Elimination of all forms of ill-treatment, abuse and discrimination in the activity of the Police.

2.1.1. Creating conditions for conducting criminal prosecution procedures in accordance with the legal provisions.

Performance Indicators: conditions created.

Timescale for completion: 2017–2020

According to the Progress Report for the implementation of the PDS in 2019, in the context of the capital modernization procedures started within Telenesti PI, on 28.05.2019, by the working group on public procurement has accepted the request for the allocation of the necessary financial resources for the upgrading and fitting-out 7 premises (rooms) according to the minimum standards: 3 cells of transit, 1 room for recognition of the suspected person in the course of the criminal proceedings, 1 room for hearings and meetings, under the conditions of confidentiality between the suspect/ accused with the lawyer. On 30.06.2019 based on the Order of GIP no.193 as of 30.05.2019, the activity of PDI of Telenesti PI was stopped, in order to carry out the capital repair for a specified period and also the procurement procedure for repair works of premises required to be used in the criminal proceedings has been launched therein. According to the GIP, the Criminal Investigation Department shall develop the draft Order of the GIP on the Minimum mandatory requirements for the rooms for hearings, rooms for recognition of the suspected person and meetings under the conditions of confidentiality between the suspect/ accused with the lawyer in the territorial subdivisions of the Police.

The Promo-LEX Association reiterates that in the absence of a study on the needs or conditions to be created to carry out the criminal proceedings, it is difficult to assess the efforts of the implementing institutions, namely those related to the purchase of goods, determining if they are sufficient to fulfil the existing indicators. At the same time, Promo-LEX recommends continuing the efforts in upgrading and equipping the cells, rooms for conducting interviews/rooms for presenting persons for recognition in each police inspectorate.

2.1.2. Improving conditions in the provisional detention facilities of the Police in accordance with European Union standards.

Performance Indicators: Evaluation report elaborated; Improved conditions

Timescale for completion: 2017–2020

According to the Progress Report for the implementation of the PDS in 2019, after completion of the renovation works there have been put into operation 9 PDIs in Hancesti PI; Orhei PI; Cimislia PI; Ungheni PI; Causeni PI; Edinet PI, Singerei PI, Riscani PI and Cahul PI, the isolators meeting the requirements of the minimum mandatory norms for detention facilities within the Police, having the following equipment: video monitoring systems, guard-to-cell communication (cell intercom system), radio set, lighting, fire-control system, guidance elements designed to respect religious beliefs, but also other conditions that guarantee respect for the rights, safety and security of persons deprived of their liberty during detention.

For establishing the improvement of detention conditions within the Provisional Detention Isolators (PDIs), the Promo-LEX monitors visited 8 provisional detention isolators (Singerei PI, Causeni PI, Edinet PI, Chisinau PD, Orhei PI, Cimislia PI, Cahul PI, Riscani PI) out of 10, having as milestones the Minimum Mandatory Norms for detention facilities within the Police, approved by the GIP Order no. 527 of 28.12.2017. The detailed findings are reflected within the action A.2.1.³⁷(Policy Matrix) and will not be repeated within the sub-action hereof.

Following the observations made, Promo-LEX finds that the Provisional Detention Isolators visited largely correspond to the minimum conditions of detention and recommends that further efforts be made to improve the conditions in the provisional detention facilities, through investing in the renovation and releasing to service the other 5 provisional detention isolators. On the same lines, Promo-LEX Association recommends identifying single solutions in all PDIs on ensuring the availability of cleaning services within the PDIs, employment of at least two women with the Detention and Escort Service, to ensure compliance with the procedures for performing the body search of women, providing water and food to detainees while escorting them and establishing the express operational norms/procedures regulating the way of video recording, storage and use of records made in the PDI and access level of employees to records made in the premises of detention facilities.

2.1.3. Improving the conditions of transportation of individuals who are detained/arrested in the process of criminal prosecution.

Performance Indicators: both transportation units and equipment needed were purchased therein

Timescale for completion: 2018–2020

According to the progress report for the implementation of the PDS, in 2019 there have been completed the process started from previous years, of purchasing and re-equipment, according to the approved norms, of 25 transport units for transporting detainees.

These special vehicles were transmitted to the Police Territorial Units during on 12.02.2018 and 15.01.2019. All vehicles are equipped with systems for video monitoring, airconditioning, ventilation, artificial lighting adapted to the surface of the rear speaker, seat belts, etc., in order to ensure the observance of the safeguards for persons deprived of their liberty in the process of transportation. By renewing the truck park, the conditions for transporting detainees were substantially improved, ensuring their security and safety, as well as improved working conditions for Police officers involved in escort missions.

³⁷ See pages 45-51

It is important to highlight that, the Promo-LEX monitors have inspected 28 special vehicles for transporting detainees or which have performed the transportation of detainees during 2019 (Annex no. 5), both special vehicles purchased within the Budget Support Program and those that came into the possession of the GIP until 2017. As benchmarks for performing the inspection of the aforementioned special vehicles were used the Standard Minimum Rules for equipping and endowing the special vehicles intended for the transportation of individuals detained and in custody of the police, approved by the GIP Order no. 527 of 28.12.2017. We note that, the detailed findings, identified during the observation have been reflected in the Annex no. 7 and action A.2.1³⁸(Policy Matrix) and will not be repeated within the sub-action hereof.

Following the observations made, Promo-LEX concludes that the special vehicles have been equipped and endowed and largely correspond to the minimum criteria set under the GIP Order 527/2017, the conditions for transporting detainees/arrested being substantially improved. However, referring to the standard rules for equipping and endowing the special vehicles thereof, we found that only one special vehicle of those inspected, (belonging to Riscani PI) meets all the criteria assessed by the monitors. Ten special vehicles (those belonging to Chisinau PD (4), Cahul PI, Causeni PI, Strasen PI, Cimislia PI, Edinet PI, Orhei PI) failed to meet a single criterion of those assessed (either there is no video monitoring system - 3, or there is no resistant anti-slip tape applied on the surface of seats -1, either the windows in the compartment intended for detainees are not tinted - 6), six special vehicles do not meet two of the assessed criteria, seven special vehicles do not meet three or four criteria, while four special vehicles do not meet 8-11 criteria of those assessed.

In light of the foregoing, Promo-LEX Association *appreciates the efforts in improving the conditions of transportation of detained individuals and recommends continuing to implement the sub-action thereof.*

2.1.4. Ensuring compliance with International Human Rights Standards when performing a citizen's arrest and any other operative measures

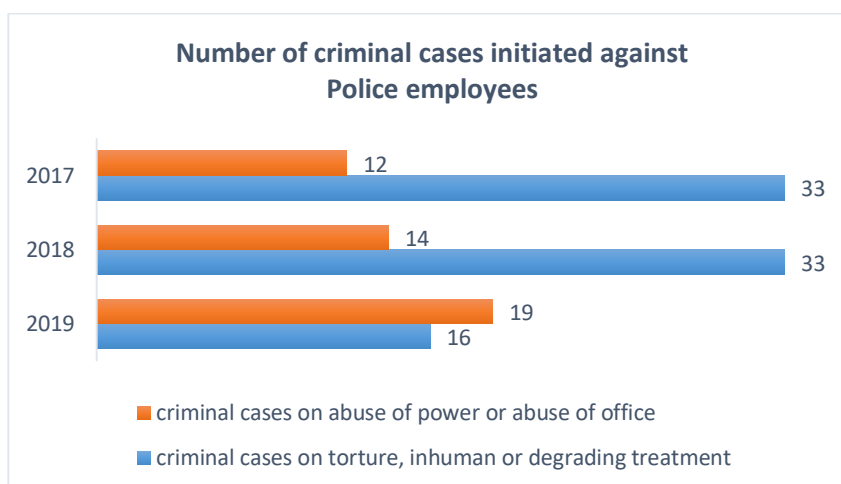
Performance Indicators: number of complaints on abuse involving police officers should decline by 20% until 2020

Timescale for completion: 2017–2020

According to the progress report for the implementation of the PDS, 16 criminal cases of torture, inhuman or degrading treatment and 19 criminal cases for abuse of power or abuse of service were started during the year 2019.

³⁸ See pages 45-51

Chart no. 14. Number of criminal cases initiated against Police employees, according to activity reports developed by the General Prosecutor Office for the years 2017–2019



Thus, the chart no. 14 shows a halving in the number of criminal cases on torture, inhuman or degrading treatment initiated in 2019 compared to 2018 and 2017 (-51.5%). In contrast, the number of criminal cases on abuse of power or abuse of office is increasing (+35.7%).

On the same lines, 29 criminal cases against police collaborators were sent to trial in 2019 (18 in 2018)³⁹ according to the Report of the General Prosecutor's Office.

In addition, in 2019 two verdicts have been issued by the courts of first instance against three police officers, a prison sentence being applied with suspension and deprivation of rights to take up positions held at the time of committing the offence under art. 166¹ (Torture, inhuman and degrading treatment) of the Criminal Code.⁴⁰

Furthermore, according to both the MIA activity report for 2019 and the 2019 Police Activity Report, disciplinary sanctions have been applied in respect of 119 police employees for their inappropriate conduct when performing their job duties as well as when interacting with the citizen, the number of police employees in relation to whom disciplinary sanctions have been applied declining by 21.19% compared to the year 2018. Disciplinary sanctions containing a warning have been applied to 43 employees, those containing a written reprimand have been applied in respect of 35 employees, under threat of redundancy - 22, rough reprimand applied to 13 employees, 3 employees sanctioned with being lowered in rank or position and downgrading.

According to the GIP response of 26th March 2020, to request for information submitted by Promo-LEX in respect of the number of abuse complaints involving police officers, the GIP informed that during 2019 there have been registered **17 abuse complaints** (maltreatment of civilians) involving police officers.

³⁹ The Activity Report of the General Prosecutor's Office for 2019, page 28 <https://bit.ly/2Ws9aIX>

⁴⁰ The Activity Report of the General Prosecutor's Office for 2019, pages 87-88 <https://bit.ly/2Ws9aIX>

Table no.5. Statistics on abuse complaints involving police officers

Abuse complaints involving police officers	The result of the examination of complaints
4 complaints on maltreatment in the course of performing their duties	<ul style="list-style-type: none"> ✓ 8 cases – were not confirmed ✓ 1 case – sent to the General Prosecutor Office, which did not cover police officers ✓ 2 police officers - warned ✓ 3 disciplinary sanctions applied ✓ 1 police officer submitted a letter of resignation on his/her own volition ✓ 2 criminal cases initiated (art. 287 Criminal Code - <i>Hooliganism</i>, art. 151 Criminal Code - <i>Serious intentional injury to bodily integrity or health</i>)
13 complaints on maltreatment beyond working hours	

The Promo-LEX Association welcomes the reduction in the number of criminal cases initiated on torture, inhuman and degrading treatment, however it is concerned about the increase in the number of criminal cases on abuse of power or abuse of office. In addition, Promo-LEX *condemns the abuses committed by police officers against detainees and reiterates its recommendation addressed to the management of the implementing institutions to provide prompt response to all allegations on cases of abuse, inhuman or degrading treatment or on any other abuses committed by Police employees.* Also, Promo-LEX *recommends that efforts be continued to ensure compliance with international human rights standards when performing a citizen's arrest and any other operative measure.*

2.2. Reviewing the status of the investigation officers and criminal investigators

2.2.1. Establishing the role, place and duties of the criminal prosecution subdivisions within the Police in the context of the judicial sector reform

Performance Indicators: joint working group created therein; concept developed and recommendations formulated therein

Timescale for completion: 2016–2017

The achievement of the action hereof was not reflected in the progress report for the implementation of the PDS in 2019.

It is recalled that according to the progress report for the implementation of the PDS, in 2016 an inter-institutional working group was set up with a view to elaborating the concept under the topic “establishing the role, place and duties of the criminal prosecution subdivisions within the Police in the context of the judicial sector reform”. It was found at a meeting that the proposed action is derived from an activity of the Justice Sector Reform Strategy for 2011-2016 and that its implementation is possible only after an activity carried out in this regard at inter-ministerial level, in accordance with the Justice Sector Reform Strategy. Ultimately, it was concluded that the activity of the working group set up was inappropriate at that time.

*Taking into account the fact that neither during 2019 the achievement of the assessed activity was renewed nor the Action Plan for the implementation of the PDS was amended, the Promo-LEX Association further qualifies the sub-action no. 2.2.1 as **unfulfilled**.*

2.2.3. Adapting the legal framework on special investigation activity to the Community Standards.

Performance Indicators: draft law developed and submitted for approval

Timescale for completion: 2016–2018

Although the activity thereof was not performed within the time limit laid down by the action plan, the achievement of the action hereof was not reflected in the progress report for the implementation of the PDS in 2019.

It is recalled that on 31.07.2017 a draft law amending and supplementing some legislative acts (Law on financial institutions no. 550-XIII of 21.07.1995, Code of Criminal Procedure of the Republic of Moldova, Law no. 59 of 29.03.2012 on special investigation activity) developed by an inter-ministerial working group⁴¹, has been submitted by the Ministry of Justice for public consultations, the inter-ministerial working group ceasing its activity in August 2017.

According to the implementing institutions, on the 27th of June 2019, the Ministry of Internal Affairs has repeatedly requested the Ministry of Justice to review some amendments and start the process for the adoption thereof. The amendments proposed cover inclusive changes to the Code of Criminal Procedure and Law no. 59/2012 on special investigation activity. The amendments proposed aim at anticipating possible impediments to prosecution and bringing perpetrators to criminal responsibility; focusing the efforts of criminal investigation authorities in order to investigate crimes with an increased degree of social danger; avoiding the unconstitutionality of some rules; ensuring the protection of fundamental rights and freedoms by establishing supplementary guarantees; removing existing gaps in legislation; and other objectives with the aim of harmonising the legislation. However, the aforementioned amendments proposed under the relevant draft law were not approved during 2019.

*Thus, Promo-LEX ascertains that the promotion of the legal amendments on special investigation activity has been procrastinated by the Ministry of Justice and further qualifies this sub-action **as unfulfilled**. In this connection, we recommend the Moldovan authorities to implement the actions required for the approval of the amendments aiming at adapting the legal framework on special investigation activity to Community standards in the near term.*

Based on the Policy Matrix

A.2.1. Reducing ill-treatment, abuse and discrimination of persons in the custody of the Police

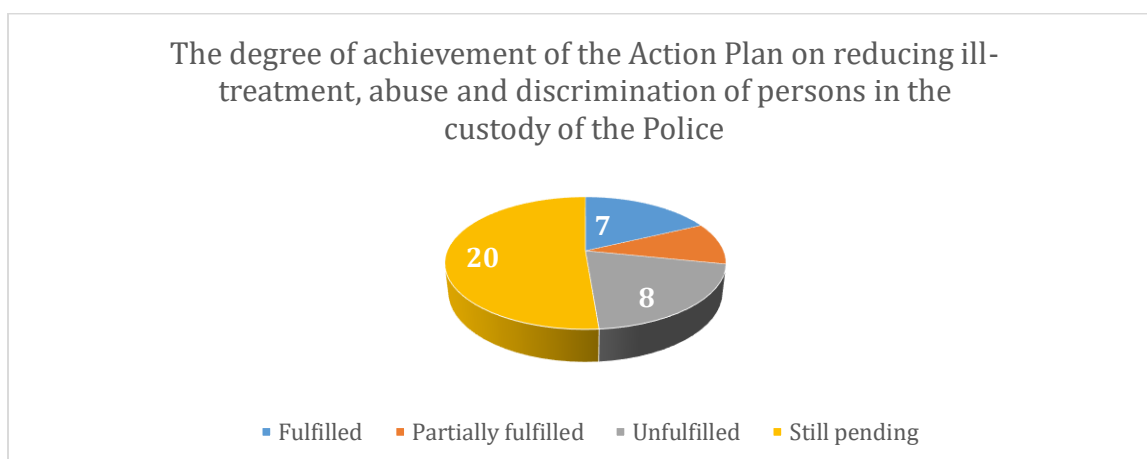
2019 Indicator: the action plan implemented in accordance with the annual reference indicators; at least 15 PDIs and 100 facilities (cells/rooms for hearings/rooms for recognition of the suspected persons) within the operational Police; one training on Police custody attended by at least 250 persons receiving training; at least 25 special vehicles for the transportation of individuals in the custody of the Police delivered.

The progress report on the implementation of the Action Plan on reducing ill-treatment, abuse and discrimination of persons in the custody of the Police in 2019 was published on the police website.⁴²

⁴¹ Draft law amending and supplementing some legislative acts (on special investigation activity). Go to the link: <https://bit.ly/2YFxSZu>

⁴² <https://bit.ly/3aBpVqP>

Chart no. 15. *The degree of achievement of the Action Plan on reducing ill-treatment, abuse and discrimination of persons in the custody of the Police*



According to the report for the implementation of the Budget Support Program, the main achievements of 2019, in respect of the objective 2.1. are the following:

- the approval of several departmental instruments required in the area thereof: the Framework Regulation on the organisation and operation of the Detention and Escort Division/Service in the territorial subdivisions of the General Inspectorate of Police, "Work Manual of the Detention and Escort Division/Service to be applied when escorting and transporting the individuals in the custody of the Police", "Manual on the organization and functioning of Provisional Detention Isolators";
- drafting and approval of the standard operating procedures on the mechanism to ensure medical assistance to individuals who are arrested and provisionally detained and ensuring the right of individuals who are arrested/detained to use the services of a translator or interpreter while being detained, supervised, escorted and transported;
- re-launching the activity of 10 Provisional Detention Isolators (PDIs) operating under the regional principle (*Edinet, Riscani, Singerei, Orhei, Ungheni, Hincesti, Chisinau, Causeni, Cimislia and Cahul*), the activity of 26 PDIs being completely stopped;
- acceptance of the request for the allocation of the necessary financial resources for the upgrading and fitting-out in Telenesti PI, according to the minimum standards, 7 rooms of the 100 set out in the Policy Matrix: rooms for recognition of the suspected person in the course of the criminal proceedings, meetings with the lawyer, rooms for hearings, cells of transit;
- from 2017 onwards, it was possible to purchase and re-equip, according to the approved norms, 25 transport units for transporting detainees⁴³, that were transmitted to the Police Territorial Units on 12.02.2018 and 15.01.2019;
- conducting 6 training sessions for employees of detention and escort services, that were attended by 104 persons.

The table no. 6 below shows the data obtained during the interviews conducted with the representatives of the Detention and Escort Division/Service on provisional detention isolators renovated in 2019 and regionalized, its accommodation capacity as well as the composition of the staff within the respective Detention and Escort Divisions/Services.

⁴³ According to the GIP 15 of 25 special vehicles purchased have been equipped with video monitoring systems

Table no. 6. Renovated Provisional Detention Isolators

PDI within	Date of placing in service the PDI	Date when individuals started to be detained in the PDI	PIs from which the detainees are brought	The number of employees within the DES ⁴⁴ , according to Payroll and Job Description Schedule	Persons employed with the DES		Number of vacant positions within the DES	The maximum number of seats for detainees
					Women	Men		
Edinet PI	16.12.2019	18.12.2020	Ocnita, Edinet, Briceni, Donduseni	22	3	19	0	19
Riscani PI	01.01.2020	03.01.2020	Riscani, Drochia, Glodeni	21	0	15	6	10
Causeni PI	11.11.2019	01.03.2020	Causeni, Stefan Voda	10	0	10	0	13
Orhei PI	31.10.2019	02.12.2019	Rezina, Soldanesti, Telenesti, Orhei.	20	1	10	9	14
Chisinau municipality PD⁴⁵	is not known exactly	2013	Botanica, Riscani, Ciocana, Centru, Buiucani, Bender, Criuleni, Anenii- Noi, Dubasari, periodically - Ialoveni	103	4	66	34	76
Singerei PI	16.12.2019	Did not start to operate	-	5	0	5	0	18
Cimislia PI	13.11.2019	25.11.2019	Cimislia, Leova, Basarabasca	16	0	10	6	10
Cahul PI	26.12.2019	01.01.2020	Cahul, Cantemir, Taraclia, Vulcanesti	23	5	14	4	13
Hincesti PI	20.10.2019	24.10.2019	Ialoveni, Hincesti	19	3	14	2	13
Ungheni PI	21.11.2019	26.11.2019	Nisporeni and Ungheni	15	2	12	1	13

On the operationalization of the provisional detention isolators and structure of the Detention and Escort Division/Service

The provisional detention isolators that were renovated operate under regionalized regime, persons detained in 2-4 territorial administrative units being brought here. However, having analyzed the data in the Table no. 6 above, it is not clear where the detainees from Balti, Falesti, Soroca, Singerei, Floresti, Straseni, Calarasi, Comrat, Ceadir-Lunga Police Inspectorates are being brought, although according to the Report for the implementation of the Budget Support Program, the activity of 26 PDIs has been stopped.

In the last quarter of 2019, 8 provisional detention isolators were put into operation, the PDI under the Police Directorate of Chisinau operating since 2013, while the PDI under Riscani PI being put into operation on the 1st of January 2020. At the same time, five PDIs (Hincesti, Cimislia, Ungheni, Orhei, Edinet) returned to its activity on detaining individuals in 2019, three (Cahul,

⁴⁴ Detention and Escort Service

⁴⁵ Figures for the number of positions and persons employed cover both the Provisional Detention Isolator and Chisinau Escort Battalion

Riscani, Causeni)- returning to its activity on detaining individuals in the first quarter of 2020, while Singerei PDI did start to ensure the detention of individuals yet.

Promo-LEX finds an extremely different ratio between the maximum number of people who may be held in the isolator and number of employees in the Detention and Escort Division/Service, according to Payroll and Job Description Schedule. If, in the case of Causeni PDI, 10 persons in the Detention and Escort Service (DES) should ensure the detention and escort of 13 detainees, when it comes to Riscani PDI, 21 employees of the DES should ensure the detention and escort of 10 detainees. *Hence, Promo-LEX recommends exploring the opportunity to periodically review the number of persons employed with detention and escort services, in order to standardise and adjust the services thereof when required.*

On the infrastructure of provisional detention isolators

For establishing the improvement of detention conditions within the Provisional Detention Isolators (PDIs), the Promo-LEX monitors visited 8 provisional detention isolators (Singerei PI, Causeni PI, Edinet PI, Chisinau PD, Orhei PI, Cimislia PI, Cahul PI, Riscani PI) out of 10, having as milestones the Minimum Mandatory Norms for detention facilities within the Police, approved by the GIP Order no. 527 of 28.12.2017.

Taking into account the findings of Promo-LEX monitors on the compliance of Provisional Detention Isolators to the Minimum Mandatory Norms for detention facilities within the Police, approved by the GIP Order no. 527 of 28.12.2017 (Annex no. 6), we conclude that the Provisional Detention Isolators visited largely correspond to the minimum conditions of detention, and respectively, to the Minimum Mandatory Norms for detention facilities.

Please note that if Provisional Detention Isolators ensure minimum conditions for both detainees and working conditions for the employees of the Detention and Escort Service, when it comes to Chisinau Escort Battalion, no minimum working conditions are provided therein, neither changing room, minimum hygiene conditions being available, nor premises intended for hygienic sanitary activities of employees.

At the same time, representatives of the Detention and Escort Service were contacted with some additional questions, including the representatives of those two PDIs, which were not visited because of the emergency state declared in the country (Hinesti PDI, Ungheni PDI)⁴⁶.

On cleaning services

According to respondents, cleaning services are available within nine out of ten PDIs. However, it appears that there is no uniform decision on how to ensure such services within the isolators. One of the respondents stated that cleaning is assured by the employees of the isolator, while in two other cases, the respondents declared that the person employed with the police inspectorate responsible for keeping the workplace clean and tidy, also provides cleaning services for the isolator.

On performing the body search of women

According to feedback from interviewees, women are employed with six isolators (Ungheni, Edinet, Chisinau municipality, Hinesti, Cahul, Riscani, Orhei) who may perform the body search of female detainees when required. At the same time, no women are employed with the four existing provisional detention isolators (Causeni, Cimislia, Singerei, Riscani), in the Detention and Escort Service, and according to feedback from two interviewees, the body search of female detainees is performed by female employees of the respective Police Inspectorate, criminal investigations department.

⁴⁶ See the Methodology for Civic Monitoring section

On providing food to detainees during their detention and escort

According to the respondents, detainees in the PDI, during their imprisonment, are being provided with food 3 times a day, service contracts being concluded with economic operators in the case of nine provisional detention isolators as well as with the district hospital in the case of Singerei PDI.

On the same lines, although some of the respondents declared that detainees are provided with food while being escorted, under the information offered, the Promo-LEX monitors found that detainees are not provided with food during their escort. According to the respondents, provision of food would not be necessary, as the escort does not take that long (e.g. a maximum of two hours) and detainees are provided with food in the isolator before being escorted; also food may go bad during the escort, however both food and water are ensured by the family of the detainee. At the same time, in at least two PDIs, detainees are provided with drinkable water while being escorted.

On the training of persons employed with the Detention and Escort Service

According to the respondents, 71 persons (36.78%) of all 193 persons employed with the PDI when conducting the interviews have been instructed in the field of police custody within all 10 PDIs. At the same time, all employees of Edinet, Riscani, and Singerei PDIs received training, and by contrast – no employee of Cahul PDI and Cimislia PDI received training in the field of police custody. According to the GIP, 446 persons received training on Detention & Escorting between 2017 and 2019, the last trainings being conducted in May 2019. Consequently, in the case of Cimislia PDI (reopened on 18.11.19) and Cahul PDI (reopened on 26.12.2019), only people who have continued to work in this service participated in training sessions organized with the support of partners. Therefore, in view of the recent approval of the regulatory framework and the recent selection of candidates for these positions, the latter are to be included in the training process.

Considering both the aforementioned and the reopening of seven PDIs in the last quarter of 2019, Promo-LEX notes that a large share of persons receiving training between 2017 and 2019, do not work for the PDIs any more, following the closure of 26 PDIs. Thus, it is advisable to provide the employees of the detention and escort service/division working in the PDIs that were reopened with training in the near term, but also to plan conducting the training for the employees before starting to detain the persons in the PDIs that are to be reopened. Furthermore, it should be noted the fact that both the sustainability of the activities conducted and trainings organized during the reform process must be ensured therein.

On video camera recorders installed in the accommodation spaces

According to Promo-LEX monitors, video camera recorders are installed in all cells for detention showing the whole accommodation space except for the hygienic sanitary space in all monitored PDIs. Taking into account the right to private life of persons, but also the need for ensuring both security and discipline in the detention spaces within the PDI, Promo-LEX recommends developing express operational norms/procedures regulating the way of video recording, storage and use of records and access level of employees to records made in the premises of detention facilities.

On special vehicles held by PDIs

21 special vehicles are re-equipped and endowed of all 25 held by PDIs that were reopened. All expenditure relating to maintaining these special vehicles for escorting the detainees are covered by the respective police inspectorates, or respective police directorate.

Table no. 7. Statistical data on special vehicles held by PDIs

PDI within	Maximum number of seats for detainees	Special vehicles held by PIs	Re-equipped and endowed special vehicles	Additional special vehicles needed according to the DES
Edinet PI	19	3	3	0
Riscani PI	10	1	1	2
Causeni PI	13	2	2	0
Orhei PI	14	3	3	1 ⁴⁷
Chisinau mun. PD (PDI and Chisinau Escort Batallion)	76	7	7	2 ⁴⁸
Singerei PI	18	2	2	0
Cimislia PI	10	2	1	3
Cahul PI	13	2	2	3
Hincesti PI	13	1	0	1 ⁴⁹
Ungheni PI	13	2	0	1 ⁵⁰
Total:	-	25	21	13

According to the interviewees, special vehicles held by 3 PDIs (Riscani, Cimislia, Cahul) are not sufficient to ensure the performance of the escort activities required therein, while 3 PDIs (Orhei, Hincesti and Ungheni) would need one more smaller special vehicle that would enable the transportation of one or two persons, being possible at the same time, to save fuel; also Chisinau Escort Batallion would need 2 more vehicles for the transportation of people with special needs.

According to the GIP, the number of special vehicles related to the number of detention facilities when applying the same working processes, covers the needs thereof in the proportion of 65-70%.

On the conditions under which persons in the custody of the Police are transported

For establishing the improvement of conditions under which persons in the custody of the Police are transported, Promo-LEX monitors have inspected 28 special vehicles for transporting detainees or which have performed the transportation of detainees during 2019 (Annex no. 5), both special vehicles purchased within the Budget Support Program and those that came into the possession of the GIP until 2017. The special vehicles that were inspected are managed by PIs having in its responsibility PDIs as well as by PIs having no PDIs under its responsibility. The prior mentioned vehicles have been inspected having as milestones the Standard Minimum Rules for equipping and endowing the special vehicles intended for the transportation of individuals detained and in custody of the police, approved by the GIP Order no. 527 of 28.12.2017.

The details of direct observations made by Promo-LEX monitors are shown in Annex 7. Some generalised data may be seen in charts 16 and 17.

⁴⁷ A smaller special vehicle would be needed for 1-2 detainees in order to save time, fuel, but also for more operative transportation

⁴⁸ It would be necessary to equip special vehicles for people with disabilities, this would make work easier and there would be no complaints about the transport conditions of people with special needs.

⁴⁹ A smaller special vehicle would be needed to perform the transportation of a single person.

⁵⁰ It would be great to have a vehicle to escort a single person.

Chart no.16. Number of special vehicles received during 2012-2019 period

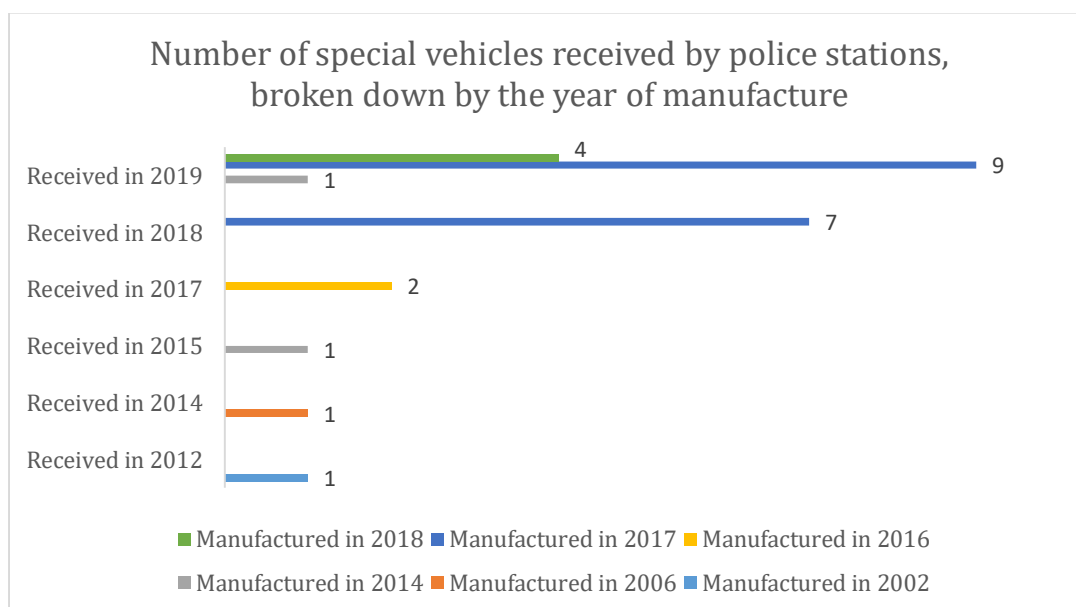
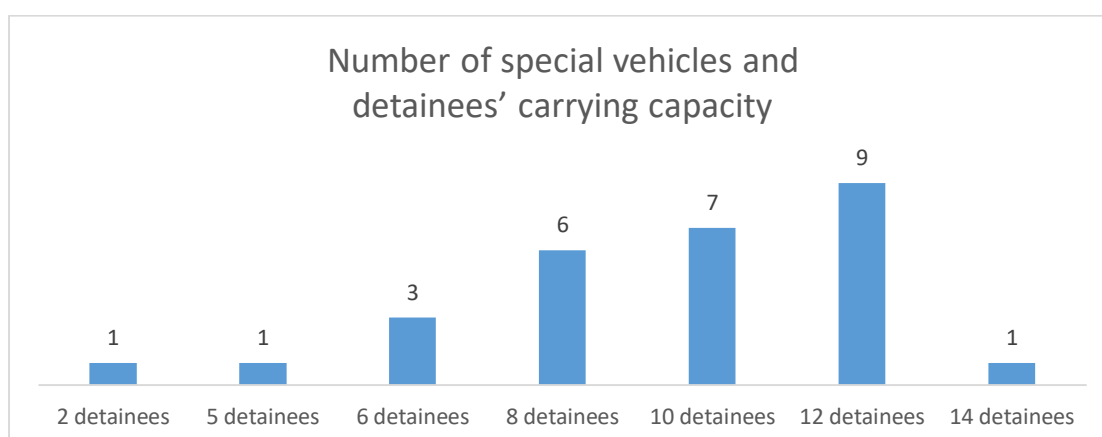


Chart no. 17. Number of special vehicles and detainees' carrying capacity



Taking into account the findings of Promo-LEX monitors on the compliance of special vehicles to the Standard Minimum Rules for equipping and endowing the special vehicles intended for the transportation of individuals detained and in custody of the police (Annex no. 7), Promo-LEX concludes that although the special vehicles have been equipped and endowed and largely correspond to the minimum criteria set in respect thereof, a single special vehicle managed by Riscani PI meets all the criteria assessed by the monitors. Ten special vehicles (those belonging to Chisinau PD (4), Cahul PI, Causeni PI, Straseni PI, Cimislia PI, Edinet PI, Orhei PI) failed to meet a single criterion of those assessed (either there is no video monitoring system - 3, or there is no resistant anti-slip tape applied on the surface of seats -1, either the windows in the compartment intended for detainees are not tinted - 6), while six special vehicles do not meet two of the assessed criteria. Also, Promo-LEX recommends establishing a clear procedure on the scope and method of use of the video monitoring equipment, place and time of information storage and level of access of employees to the recordings made. Such procedures are also required when it comes to the monitoring of the location area and drive direction of the special vehicle (GPS Trackers). Additionally, the Promo-LEX Association also recommends conducting trainings for employees on the use of the aforementioned equipment.

Police Facilities (cells, rooms for hearings, rooms for recognition of the suspected person, meetings with the lawyer)

According to the Progress Report on the implementation in the year 2019 of the Action Plan on reducing ill-treatment, abuse and discrimination of persons in the custody of the Police covering 2017-2020 years, in the context of the capital modernization procedures started within Telenesti PI, on 28.05.2019, the working group on public procurement has accepted the request for the allocation of the necessary financial resources for the upgrading and fitting-out **7 premises** out of 100 provided for in the Policy Matrix according to the minimum standards. The reconstruction of the aforementioned premises was completed towards the end of 2019 and another 93 rooms within the territorial police units are proposed to be renovated and put into operation by the end of 2020.⁵¹

However, according to the GIP, also in 2019, in addition to those seven premises within Telenesti PI, the following facilities were put into operation:

- one room for hearings and another room for meetings with the lawyer, under the conditions of confidentiality have been created in 10 PDIs, thus, in total **20 rooms** being put into operation;
- rooms for hearings under the conditions of confidentiality have been created in all 17 police stations that were upgraded. Therefore, at the current stage, all **17** inaugurated police stations have such hearing rooms.

Promo-LEX draws the attention of implementing institutions to the differences reflected in the reports and/or opinions of the GIP and recommends using the same information. Thus, Promo-LEX considers that the 100 facilities that were to be put into operation by the end of 2019, refer to the premises within the territorial police units, as reflected in the public reports developed by the GIP, including the Report on the implementation of the 2019 Budget Support Program. Referring to the seven premises within Telenesti PI, we reckon that although the modernisation works have been completed, the headquarters of Telenesti PI was not put into operation during 2019, and consequently the premises thereof cannot be considered operational.

It should be noted that the draft order of the GIP on the minimum mandatory norms for the rooms for hearings, rooms for recognition of the suspected person, rooms for meetings, under the conditions of confidentiality between the suspect/accused with the lawyer within the territorial subdivisions of the Police is currently being developed.

*Building on the reference indicators set within the action A.4.1. for 2019 and assessing the conditions for detention and transportation of detainees, Promo-LEX concludes that the performance criteria **have been partially fulfilled**, there being renovated with 5 PDIs less and not a single facility of those 100 intended (cells/rooms for hearings/rooms for recognition of the suspected person) is operational.*

⁵¹ The Progress Report on the implementation in the year 2019 of the Action Plan on reducing ill-treatment, abuse and discrimination of persons in the custody of the Police covering 2017-2020 years, See: section 2.2.7 available at <https://bit.ly/3djwLCs>

OBJECTIVE 3: consolidating the capacities of the Police to fight organized crime, trafficking in human beings, cybercrime, violence, including gender-offences, drug and weapons smuggling, counterfeiting and money laundering.

Objective 3 aims at increasing the capacity of the Police in combating crime and ensuring public security. It contains 2 actions and 12 sub-actions. According to Promo-LEX observations, ten of the sub-actions (83.3%) were planned for the period of 2016 - 2019.

Regarding the degree of achievement of the activities planned, Promo-LEX notes that out of 10 sub-actions subject to assessment, only 3 (30%) can be considered as fulfilled, one sub-action (10%) – is unfulfilled, three (30%) – partially fulfilled, while in the case of the other three sub-actions (30%) – the Association could not assign any rating.

The completion deadline expired in the case of two sub-actions only in 2019, both of them being impossible to be evaluated, due to unmeasurable indicators. The rating for one sub-action has been changed from unfulfilled into fulfilled.

As for the Policy Matrix, the indicators for the action A.3.1. have been partially fulfilled.

Based on the Police Development Strategy

3.1. Developing the capacity of structures responsible for combating organized and cross-border crime.

3.1.1. Purchasing special equipment and hardware for qualitative investigation of all categories of criminal offences.

Performance Indicators: purchased equipment

Timescale for completion: 2017–2019

According to the Progress Report for the implementation of the PDS, during the month of November 2019, 90 phones (smartphones) and 20 power banks have been granted in order to achieve a qualitative result of the investigations conducted therein.

We note that procurement of the same devices have been reported in both this sub-action and sub-action 4.2.8. In this respect, it is recalled that in the Report no. 1 on the civic monitoring of Police Reform, Promo-LEX stated that it is advisable to avoid this practice, or amending the performance indicators, to include the provision referring to the goods' procurement area.

When territorial subdivisions were asked by Promo-LEX to provide them with information on the endowment thereof with special equipment and technical devices for qualitative investigation of all categories of offences between 2017 and 2019, 12 police inspectorates have listed a string of facilities that were provided to them. In this connection, the majority of the facilities provided to territorial subdivisions refer to forensic labs, crime scene supplies and forensics products, transport units and computer hardware units. However, Nisporeni PI and Leova PI stated that their subdivisions did not receive any special equipment or technical devices for the investigation of offences during this period.⁵²

Also, at least 6 police inspectorates (Balti PI, Edinet PI, Leova PI, Nisporeni PI, Vulcanesti PI, Stefan – Voda PI) declared that there is still a need to equip the subdivisions with the required special equipment and technical devices, among them being mentioned:

⁵² According to the GIP, both Nisporeni PI and Leova PI have been provided with vehicles, computer hardware units, belts, handcuffs. Leova PI received TETRA portable, mobile and fixed terminals.

- ✓ specialized technical devices, which would allow it to carry out remote or on site special investigative measures (mobile phones, portable computers) connected to the databases, including means of transport equipped with high-performance technical devices. It is also necessary to provide the subdivision with „DRAGER” appliances (Edinet PI);
- ✓ 2 GPS (auto-tracking system), 2 dictaphones, 2 micro video camera (installed in the premise, auto) (Leova PI);
- ✓ video cameras, video sound recording equipment (Vulcanesti PI);
- ✓ the technical devices required to conduct the operative-investigative measures/investigations (Stefan- Voda PI).

*In light of the foregoing, Promo-LEX Association finds that during the period for the implementation of this sub-action the special equipment and technical devices for the investigation of offences were purchased, however **it cannot provide any rating in respect of the achievement of the action no. 3.1.1** due to the unmeasurable indicator contained in this sub-action. On the same lines, Promo-LEX recommends to implementing institutions to continue its efforts in equipping the subdivisions of the Police, in line with their needs, while for the annual activity reports – to reflect the percentage value of both the computer hardware and special equipment for qualitative investigation of all categories of criminal offences in all subdivisions of the GIP.*

3.1.3. Strengthening the capacities of forensic and investigative subdivisions at regional level

Performance Indicators: working conditions created in accordance with EU standards; strengthened capacities

Timescale for completion: 2018–2020

According to the Progress Report for the implementation of the PDS, in 2019 there has been received the Mobile Laboratory of model “Ford Tranzit” with equipment for on-site research with CBRN materials and its registration on 06.02.2019. Also, training of 3 experts on the use of mobile equipment CBRN received has been conducted therein.

In addition, protective equipment class A, B and C - 6 sets; crime scene investigation forensic kit to CBRN - 6 kits, containers discharges of substances CBRN - 4 of plastic and 1 of lead, oxygenated air supply systems - 6, protection masks - 6 has been provided.

At the same time, forensic kits were purchased for the needs of the police to collect traces at the crime scene.

In the interviews conducted with the management of Police Inspectorates, all respondents declared that inspectorates are equipped with a forensic lab having forensic kits intended to fixate, reveal, collect traces as well as material evidence found in situ. Whilst, when asked whether the employees received training on the use of mobile equipment and technical devices provided to them during 2017-2019 period, 38 (92.68%) answered in the affirmative, and 3 (7.31%) – replied in the negative. At the same time, of those answering in the affirmative, 34 persons stated that all persons directly involved in the use of the equipment and technical devices received training, while two persons declared that 50% received training and respectively 70% of those involved received training.

According to the GIP, at least one representative of the Forensic Service and one criminal investigation officer from each territorial subdivision were instructed and familiarized with the methods of using both the equipment available and mobile forensic autolaborators.

Thus, including in the context of the personnel turnover, the Promo-LEX Association recommends continuing to conduct periodical trainings on the use of the equipment purchased and delivered therein and reiterates that regionalization of the structures subordinated to the GIP must take place in the near term, otherwise the effective implementation of this sub-action is uncertain. We note that

it is necessary amending the Law no. 320/2012 on the activity of the Police and the status of police officer with a view for the regionalization of the territorial structures of the Police, although, until the end of 2019, no draft law in respect thereof has been published for consultations.

3.1.5. Improving the application on the electronic registry of arms

Performance Indicators: specialized software purchased and installed

Timescale for completion: 2017–2018

According to the report for the implementation of the PDS, in 2019, there has been conducted the tender for acquisition of services for the development of the Automated Information System “State Firearms Registry”, and thereafter on 14.08.2019 the Contract for the acquisition of the services thereof was concluded with the Economic Operator.

According to the 100 days Government Report⁵³, on 13.11.2019 the technical task of the Automated Information System Software “State Firearms Registry” was positively approved – the latter being deliverable for the first phase of the Project Implementation, development of the Automated Information System Software “State Firearms Registry” due to be completed on 8th of April 2020.

We note that in the Report no. 2 on civic monitoring of police reform in the Republic of Moldova, following the interviews conducted with the management of police inspectorates, Promo-LEX highlighted a series of changes or deficiencies that are expected to be removed once the State Registry application is improved.⁵⁴

*In light of the foregoing, the Promo-LEX Association states that **the sub-action no. 3.1.5 was partially fulfilled**, the services purchased having to be delivered and the system thereof installed. Although the deadline has expired, we recommend continuing the efforts in providing all necessary assistance to the economic operator in the development of the information system, receipt thereof, including the fact that the deficiencies detected by users will be removed and the system will be installed.*

3.1.7 Improving the capabilities of the Special Police Brigade “Fulger” for intervention in combating organized crime, terrorism and extremism according to the specific powers assigned to it.

Performance Indicators: trainings conducted; equipment purchased; infrastructure created and developed therein.

Timescale for completion: 2018–2019

According to the progress report for the implementation of the PDS, in 2019, the employees of the Special Police Brigade (SPB) “Fulger” participated in 482 operations and training, 6 stages of training, study and work visits, special equipment being purchased therein.

⁵³ See page 2 <https://bit.ly/394x6WR>

⁵⁴ Report no. 2 on civic monitoring of police reform in the Republic of Moldova, pages 14-16. Go to the link: <https://bit.ly/2yrgVXf>

Table no. 8. Activities for improving the response capabilities

2019	Exercises/ operations	<ul style="list-style-type: none"> -482 trainings were conducted, according to the signals of the fighting capacity: "Alarm", "Thunder", "Hurricane", "Siren", "Attack on the headquarters", "Complex exercises and applications with the group of climbers", "Antiterrorist exercises", etc. - holding 21 sessions of shootings in the Brigade Shooting, in the Interactive shooting 33 and in other polygons 37 practical shootings. - conducting exercises for simulation "Negotiations in times of crisis", for the release of the hostages captured by terrorists, carried out jointly with the Instructors from Israel; - participating in antiterrorism groups in the activities held during the football match between the national teams Moldova - France, in the framework of the UEFA European Football Championship in 2020; -105 combat capability checks with simulations; - 10 climbing sessions; - 12 marches in force with obstacles; - 5 exercises to repel the attack on the premises; - 3 practical exercises sniper elite; - 12 pistol firing exercises; - 3 shooting exercises in Danceni; - 1 Practical meeting Researching and Defusing explosive substances.
	Trainings/study visits	<ul style="list-style-type: none"> - work trip within the Campaign no. II "Basic tactics", Stockholm city, Sweden; - operational pass technicians training course, Dambovită County, Romania; - workshop Activity of Professional Training and Exchange of Experience, Harghita County, Romania; - study trip at the Police Training Center in Legionovo, Poland; - training course entitled "Staff training on tactical decision and command of operations", Rennes city, France; - study visit in the field of anticorruption, economic development and rapid response, Munich city, Germany.
	Special equipment and means purchased therein	<ul style="list-style-type: none"> - 200 ml Tear Spray (Police) - 400 ml Tear Spray (Police) - 48mm Tear grenades - 48mm Smoke grenades - 48mm Audiovisual grenades - 48mm audiogas grenades - Disposable handcuffs - Stun stick (flashlight) - electroshock gun - Spare cartridges for TASER

We note that both in 2018, and in 2019 exercises and operations have been conducted, employees participated in study/work visits and trainings, both special equipment and means being purchased therein. On the same lines, it is important to stress that although the deadline for the implementation of the sub-action was between 2018 and 2019, works for upgrading the infrastructure of the Special Destination Police Brigade „Fulger” (sports hall was upgraded and equipped, a psychological counseling office has been arranged and a virtual reality shooting simulator has been donated to the unit) have been carried out in 2017.

*Taking into account the aforementioned, but also the fact that the indicators set for this sub-action are generally formulated and do not provide for the number or type of the equipment that is to be purchased, trainings that are to be conducted and infrastructure developed therein, the Promo-LEX Association **is unable to assign any rating in respect of the achievement of this sub-action.** We reiterate that in order to assess the capabilities of SPB „Fulger” for intervention, following the*

measures taken in order to improve them, it was appropriate to develop a study to evaluate the Brigade's capabilities for intervention and needs thereof.

3.1.8. Improving the quality of professional training of investigation officers by identifying a group of trainers in subdivisions subordinated therein and providing them with training according to international standards.

Performance Indicators: trainers identified and instructed therein

Timescale for completion: 2017–2020

According to reports for the implementation of the PDS, in 2016, 15 employees have been identified as trainers. During the period 11.04.–15.04.2016 trainers' testing has been performed therein. Hence, during 2019, 6 training courses for investigation officers were organized and conducted therein being attended by 117 employees receiving training.

Table no. 9. Statistical data on the training of investigation officers

Year	Trainings conducted	Investigation officers receiving training
2017	15	199
2018	7	113
2019	6	117

Promo-LEX Association appreciates the continuity of trainings for investigation officers, however in order to ascertain the improvement of quality of trainings thereof, it reiterates the recommendation to annually assess the level of preparedness of investigation officers trained by trainers identified therein as well as to publish statistical data on the results of these assessments.

3.2. Extending the competences of the Police in preventing and combating laundering of money generated by organized crime.

3.2.1 Developing and approving drafts amending both the legislative and regulatory frameworks with a view to regulating the competences of the Police in preventing and combating the phenomenon of money laundering.

Performance Indicators: legislative and regulatory framework harmonized

Timescale for completion: second half of 2016

On 22.12.2017, a new Law was approved on the prevention and combating of money laundering and terrorist financing, in force as of 23.02.2018.

The draft developed by the GIP on granting powers to the Police in preventing and combating the phenomenon of money laundering for crimes falling within the competence of the MIA, without interfering with the existing powers and competences to receive and operate the information submitted by the reporting entities and held by the Service for Prevention and Combating of Money Laundering under the National Anti-Corruption Center, received a negative opinion from the latter. Thus, the amendments to the legislative and regulatory framework were not approved.

According to the GIP, by the letter of the NII of the GIP dated 26.07.2019 the procedure for amending the provisions of art. 269 of the Code of Criminal Procedure on excluding the art. 243

(Money Laundering) of the Criminal Code from the exclusive jurisdiction of the National Anti-Corruption Center has been reinitiated⁵⁵, which however has not been implemented.

According to the Progress Report for the implementation of the PDS, in 2019, on 09.04.2019, the Methodological Manual entitled “Guidance on conducting parallel financial investigations” which is used by the Prevention and Combating of Money Laundering and Terrorist Financing Department in the course of its activities has been developed and approved under the General Prosecutor Order no. 18/11. We note that, the goal of the aforementioned Guidance is to ensure correct and uniform application of the legislation, make the process of preventing and combating the criminal activities generating illicit income more efficient, ensure the recovery of criminal assets as well as develop the punitive policy through the effective enforcement of safety measures in respect of both special confiscation and extended confiscation, and do not govern the competences of the police in preventing and combating the phenomenon of money laundering.

*Taking into account the aforementioned, as well as the lack of approval of some modifications to the legislative and regulatory framework, the lack of modifications in the Action Plan on the implementation of the PDS, the Promo-LEX Association finds that the sub-action regarding the modification of the legislative and regulatory framework **has not been fulfilled**. Hence, we reiterate the recommendation regarding the re-examination of the need to extend the powers of the Police in this segment.*

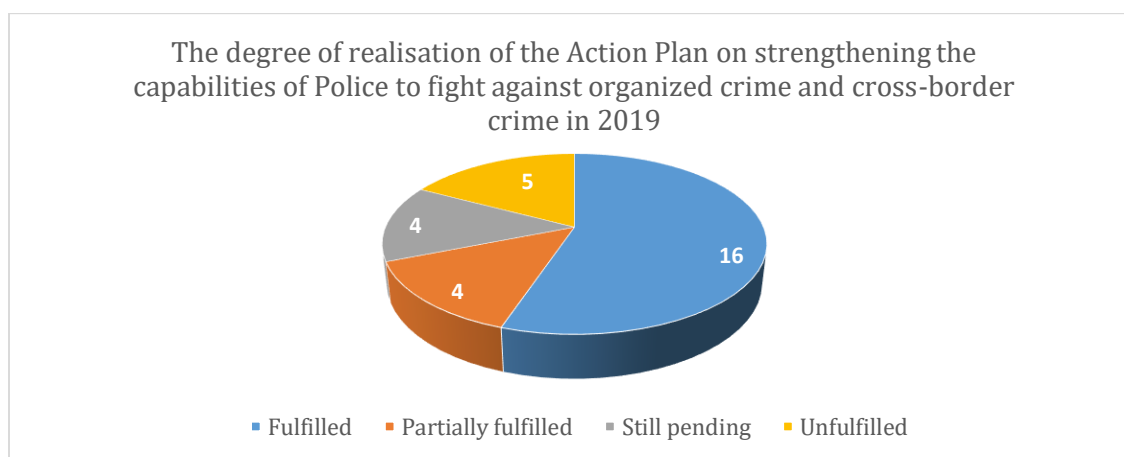
Based on the Policy Matrix

A.3.1. Developing the capabilities in the fight against organised crime and cross-border crime, including by increasing the capacity of on-the-spot investigation

2019 Indicator: the Action Plan is implemented in accordance with the reference indicators; the premises of five regional investigation units are renovated and fully operational.

The progress report on the implementation in 2019 of the 2017-2020 Action Plan on strengthening the capabilities of police to fight against organized crime and cross-border crime, has been published on the police website.⁵⁶

Chart no. 18. *The degree of realisation of the Action Plan on strengthening the capabilities of Police to fight against organized crime and cross-border crime in 2019, according to the Progress Report*



⁵⁵ In 2018, the NII of the GIP has submitted the draft Law on amending the Code of Criminal Procedure, namely para. (1) art. 269 of the Code of Criminal Procedure for review and approval, but at the initiative of the Legal Department of the GIP, the draft thereof has been withdrawn.

⁵⁶ <https://bit.ly/342OhYj>

The report on the assessment of regional investigation units has also been published on the police website.⁵⁷ According to the aforementioned report, all 5 regional investigation units are operational, the only thing being that, the North and South regional investigation units, remaining further located in the previous premises, until the completion of modernization works carried out in the new premises. Furthermore, it is mentioned that for the deployment of those 5 regional investigation units, the following locations have been identified:

- a) Balti municipality, 15 Moscovei Street – “North” Division of the NII (Northern Region);
- b) Cahul town, 79 Ioan Voda cel Cumplit Street – “South” Division of the NII (Southern Region);
- c) Chisinau municipality, 14 Bucuriei Street - NII (Central Region) and “East” Division of the NII (Eastern Region);
- d) Chisinau municipality, 6 Tighina Street – Department for combating serious criminal offences and organized crime (Chisinau municipality area);
- e) Comrat municipality, 22 Komsomolului Street – Department for coordinating the investigation activity (ATU Gagauzia area).

We note that, the regional investigation units within the Police Directorate of Chisinau municipality, ATU Gagauzia Police Directorate, North Division of NII, South Division of NII were visited between 5th and 18th of March. In addition, the National Investigation Inspectorate was visited and an attempt to identify the headquarters of the East Division of the NII was made.

While visiting the Southern Regional Investigation Unit (South Division of the NII) on 18.03.2020 by the Pomo-LEX monitor, the management of the South Division of the NII refused to answer to questions posed during the interview, arguing that the management did not notify him/her about this. Subsequently, upon the suggestion of the interviewee, the head of the NII has been contacted, the latter also refusing to provide any answers for the Southern Investigation Unit, arguing that this information has already been communicated to a Promo-LEX monitor in respect of all regional investigation units and he/she is willing to provide answers during an interview conducted in Chisinau.

The information on the Eastern Division of the NII also has not been obtained, owing to the impossibility to conduct the interview with the head of the subdivision thereof, for objective reasons (his/her participation in a training). The attempts to resume the communication concerning the conduct of the interview after the completion of training courses, have been subjected to failure. We note that, other person has not been designated to conduct this interview, and the headquarters of the Eastern Division of the NII could not be found ⁵⁸.

Table no. 10. Regional Investigation Units
according to the data obtained during the interviews conducted therein

Region	Investigation Unit	Territorial jurisdiction of responsibility	Employees, staffing plan	Persons employed on 31.12.2019	Means of transport
Northern region	North Division of the NII	Balti, Falesti, Glodeni, Donduseni, Briceni, Ocnita, Edinet, Sorooca, Singerei, Riscani, Drochia, Floresti	20	19	8
Eastern region	East Division of the NII	Criuleni, Dubasari , Rezina , Causeni , Stefan-Voda	10 ⁵⁹	-	-
Chisinau	Department for combating serious	Chisinau municipality (Botanica, Ciocana,	45	45	11

⁵⁷ <https://bit.ly/2UPWGde>

⁵⁸ According to the data provided by the GIP, following the visits made, employees in the East Division were deployed in the premises of Criuleni PI (1 office) as well as in the head office of the NII (1 office).

⁵⁹ According to the data provided by the GIP, following the visits made.

	criminal offences and organized crime of Chisinau municipality Police Directorate	Riscani, Centru, Buiucani city districts)			
Southern region	South Division of the NII	-	-	-	
ATU Gagauzia	Department for coordinating the investigation activity of ATU Gagauzia Police Directorate	Comrat , Ceadir-Lunga , Vulcanesti	8	7	3

On the infrastructure and equipment provided to employees

According to the replies provided during the interviews conducted therein, the meeting facility of an investigation unit (ATUG) has been renovated, while in other two (North Division of the NII, South Division of the NII) renovation/construction works have been carried out. At the same time, the new headquarters of the North Division of the NII is planned to be put into operation on 1.12.2020.

On the same lines, when asked whether the working conditions have been ensured for each employee and whether is there a space of at least 6 m² provided to each police officer, respondents in the investigation units of ATUG and Chisinau municipality answered in the affirmative. According to the interviewee in the Northern investigation unit, the employees with this unit are not provided with the appropriate working conditions, they having no computers, kitchen, meeting facility, WC facilities being insufficient, and the furniture - outdated.

Also, there are training rooms within the investigation units of ATUG and Chisinau municipality, and there are no any in the Northern investigation unit.

According to the answers of the interviewees, the interconnection to the available information-analytical systems, necessary to document the offences related to organised crime is ensured within the three regional investigation units. At the same time, one respondent noted that it would be necessary to interconnect databases, as they currently operate independently of each other.

Also, two respondents declared that police officers operating within the investigation units of ATUG and Chisinau municipality are adequately equipped, having also base transceiver stations, multifunctional tactical flashlight, etc.), while another respondent stated that police officers in the Northern investigation unit are not provided with the necessary equipment.

Building on the answers of the interviewees, we find that both the infrastructure and the appropriate equipping of employees is provided in the investigation units within the police directorates, and is not provided in the investigation unit of the North Division of the NII.

On the organizational structure and the normative-departmental framework

We note that the organizational structures of the regional investigation units are not uniform either in terms of the number of staff related to the assigned territorial competence, or as subdivisions that are part of the investigation unit (e.g. the investigation unit of Chisinau municipality is comprised of the Department for coordinating the investigation activity, Serious Crimes Department, public transport robbery department, while the Northern investigation unit is comprised of economic fraud department and criminal police department), not even in terms of the authority to which it is subordinated.

According to the feedback provided, there are criminal investigation groups operating within both the investigation units of ATUG and Chisinau municipality, while there is no such group operating in the Northern investigation unit.

When asked whether an internal regulation for the organization and operation of the investigation unit has been approved and job descriptions of the employees have been approved or amended in the context of regionalisation, after 26.12.2018,⁶⁰ two respondents answered in the affirmative, while one – in the negative. At the same time, one of the respondents stated that an investigation officer should be granted more powers.

Regarding the question on the activities needed for complete operationalisation of the regional investigation units, in the opinion of the interviewees, there have been listed the following:

- ✓ boosting the salaries of investigation officers;
- ✓ appointing a criminal investigation body to work together and directly with the investigation unit;
- ✓ granting more powers to investigation officers.

In light of the foregoing, Promo-LEX Association finds as follows:

- ✓ *two regional investigation units have the status of departments within Police Inspectorates, i.e. the latter operate within the same headquarters. During the interviews conducted therein, it has been mentioned several times that the aforementioned units are not structures belonging to the NII;*
- ✓ *two investigation units are subordinated to the National Investigation Inspectorate and operate under a regionalized regime, however the headquarters thereof have been renovated and are not fully operational;*
- ✓ *the East Division of the NII has been created for the Central region in February 2019 having four personnel units, whose headquarters could not be identified, having its previous headquarters located inside Anenii-Noi PI, Criuleni PI.*

*Thus, Promo-LEX concludes that the performance criteria for this action have been **partially fulfilled**, because the performance indicator on the renovation and operationalisation of headquarters of those five regional investigation units **has not been fulfilled**, while the action plan **was largely implemented** in accordance with the indicators established in respect thereof. In light of above findings we recommend examining the possibility of harmonizing the structures of regional investigation units and granting a similar status to all regional investigation units.*

⁶⁰ GIP Order no. 566 of 26.12.2018- the Framework Regulation for the organization and operation of investigation units

OBJECTIVE 4: Creating a modern police service in compliance with the best international standards and practices of the European Union, able to respond proactively and equally to the needs of the citizens and the society as a whole.

Objective 4 contains sub-actions oriented towards bringing the police service in line with European and international standards. It is a general objective, which contains 3 actions and 20 sub-actions. According to the observations of Promo-LEX, 11 of the sub-actions were to be implemented between 2016 and 2019. We consider that out of 11 sub-actions, two (18.2%) were fulfilled, whereas one (9%) remained unfulfilled. Six other (54.5%) were qualified as partially fulfilled, while in the case of two actions, the Association could not assign any rating due to too general formulations or unmeasurable indicators. At the same time, we emphasize that two other sub-actions (4.1.1. and 4.1.2.) were fulfilled before the expiry of the deadline set.

The completion deadline expired in the case of two sub-actions in 2019, one of which was qualified as unfulfilled, while in the case of the other one, the Association could not assign any rating due to too general formulations, or unmeasurable indicators. The rating for four sub-actions has been changed from unfulfilled into partially fulfilled.

The sub-action no. 4.2.10 - Development of the Police Integrated Information System presents a considerable risk of non-implementation.

As for those three actions set by the Policy Matrix, Promo-LEX qualified the performance criteria established for 2019 for two actions as fulfilled, and for one action as partially fulfilled.

Based on the Police Development Strategy

4.1. Implementing the concept of Community Policing in the structures of the General Inspectorate of Police.

4.1.3. Clear establishment of the district police officers' competences

Performance Indicators: : internal regulatory framework adjusted therein

Timescale for completion: second half of 2016 – first half of 2017

The 2019 progress report for the implementation of the PDS did not contain the activities to be conducted therein leading to a clear establishment of the district police officers' competences.

At the same time, Promo-LEX included in the Report no. 2 on civic monitoring of police reform in the Republic of Moldova, the results of the interviews conducted between 10th and 25th of November with the management of police inspectorates and police stations on district police officers' competences.⁶¹

According to the interviewees, the tasks unrelated to the job of the district police officer, which continued to be performed by them, were as follows:

- forced bringing of individuals;
- maintaining public order during events;
- enforcement of judgments and search of data on debtors;
- examining petitions and complaints not falling within the competence of the district police officer;
- performing on-call services;

⁶¹ Report no. 2 on civic monitoring of Police Reform in the Republic of Moldova, pages 17-20. Go to the link: <https://bit.ly/2JslAuc>

- discovering the offences;
- engaging in social assistance activities (for example: children left in distress by drunk parents, old people having no firewoods; psychological counselling for cases related to family violence), etc.

It should be noted that according to the GIP, the tasks given below also considered unfit, were excluded from the competence of the district police officers following the approval of the new job descriptions for district police officers in 2018:

- planning the work of the people's guards;
- receiving and recording crime alerts;
- receiving and recording of petitions;
- investigation of criminal offences;
- identifying and liquidating the facilities used for preparing, disposal and storage of narcotic drugs;
- combating illicit constructions;
- Environmental Protection Activity;
- accounting of persons released from detention facilities;
- the restoration of public order. The task thereof is being exercised by the patrolling subdivisions (NPI), "Fulger" SPPB and GIC, and is to be fully transferred, in 2021 from the jurisdiction of the Police sector into the one of the GIC, under art. 37 para. (3) of the Law 219/2018 on the General Inspectorate of Carabinieri;
- forced bringing (of mentally ill, people with TB disease) upon doctors' request. However, these tasks shall be performed with a view to maintaining public order upon doctors' request where their life and health are at risk.

The tasks below have also been amended:

- „detection of offences” was replaced by „detection of flagrant offences and participation in the detection of hot offences”;
- „detection and identification of wanted persons, missing persons, public debtors” was replaced by the task of „helping in identifying the wanted persons, missing persons, public debtors”;
- “sanitation of the territory served” has been partially excluded;
- “ensuring public order” has been partially excluded, the district police officers engaging in large-scale events at local or national level, when other forces are insufficient. The task thereof falls within the competence of patrolling subdivisions (NPI) and Carabineer Troops (GIC);
- “responding to citizens’ emergency calls” has been partially excluded, as the rapid response teams have been established therein.

On the same lines, the task on the execution of warrants on forced bringing has been preserved in the new job description under art. 22 of the Law no. 320/2012 on Police activity and status of police officer. The tasks on forced bringing were to be taken over by the Ministry of Justice under the Justice Sector Reform Strategy 2011-2016.

*In the light of the foregoing, the Promo-LEX Association notes that due to the exclusion of some tasks that were unfit, **the sub-action no. 4.1.3 has been partially fulfilled**. However, we recommend the authorities to monitor the compliance with the job descriptions thereof and find efficient solutions in order to exclude all the tasks that are unfit for the district police officers and to clearly define their tasks in relation to investigative, patrol – alarm response structures, judicial police as well as structures subordinate to other ministries.*

4.1.4. Strengthening the district police officers' communication skills

Performance Indicators: trainings conducted therein

Timescale for completion: 2017–2020

According to the Progress Reports on PDS implementation, in 2019, training sessions have been organized and conducted in the Community Policing area:

Table no.11. Statistical data on persons receiving training

The organiser	Number of persons receiving training
"Stefan cel Mare" Police Academy	29 employees (24 employees working for police stations and 5 employees responsible for the management of police stations)
Swedish Police Reform Support Program	93 employees of pilot police stations
National Trainers under the "Community Policing" Curriculum	240 employees of police stations

Thus, during 2019, **362 persons** received training. We note that, the Curriculum in the area of community policing was approved by the order of the head of the GIP no. 289 as of 17.08.2019. Communication is one of the eight topics covered by this Curriculum, it being granted 120 minutes in this course. At the end of the training of those 240 employees, testing of their knowledge has been performed, and results of the training thereof were reflected in the Information Note no.2954 of 06.12.2019.

Taking into account the aforementioned as well as the trainings conducted in previous years, Promo-LEX reveals that according to the sub-action 4.1.4 the trainings organized and conducted therein must aim at strengthening the district police officers' communication skills. In this connection, the expectations aim at organizing and conducting dedicated training specific to the way in which district police officers communicate. Also, Promo-LEX Association reiterates its recommendation to periodically assess the communication skills thereof as well as the impact of trainings conducted therein.

4.1.5. Developing the infrastructure of headquarters of both police stations and police inspectorates according to relevant standards

Performance Indicator: modernized infrastructure according to the standard model

Timescale for completion: 2017–2020

The sub-action 4.1.5. in the Action Plan for the implementation of the Police Development Strategy, where the development of the infrastructure of police stations is concerned coincides with the objective A.4.1 in the Policy Matrix for the implementation of the Budget Support. For this reason, the analysis of the degree of achievement of this action on this segment is shown in the objective A.4.1.⁶² and will not be resumed in this sub-action.

We note that in contrast to police stations, in the case of police inspectorates, no standard model for the modernization of the infrastructure thereof has been approved until 2019.

⁶² See pages 74-76

During the interviews conducted with the management of the territorial subdivisions of the GIP, regarding the question on modernisation works initiated or carried out in 2019, the respondents have declared that modernization works have been initiated or carried out in the headquarters of 13 (31.7%) police inspectorates⁶³, respectively no modernization works have been carried out in 28 (68.29%) police inspectorates.

Among the modernization works carried out in 2019 the following were mentioned:

- the events venue in Ceadir-Lunga PI was renovated;
- automatic barrier installed at the entrance of Ocnita PI headquarters;
- the roof was renovated and old windows were replaced in Edinet PI;
- service offices in Soroca PI were modernized;
- repair works of the entire floor from the administrative building of Anenii Noi PI were carried out;
- the roof was renovated, some offices were partially renovated, furniture was purchased in Rezina PI;
- the meeting room in Bender PI was renovated;
- repair works for Cahul PI entrance were performed, also it being adapted for disabled persons;
- the on-call services premise within Taraclia PI was renovated.

Apart from this, according to the 2019 Police Activity Report, two of the main achievements of the institution are the inauguration of the new headquarters of Criuleni Police Inspectorate, which was built from scratch, fitted with furniture and latest generation appliances due to the money allocated from the state budget and the capital repair of Telenesti Police Inspectorate, which was possible to be completed due to the money allocated from the state budget;

In light of the foregoing, Promo-LEX recommends developing a vision or concept for modernizing the infrastructure of police inspectorates and approving the list of modernization works proposed to be carried out in the next period together with the works execution time schedule.

4.1.7 Organizing prevention activities in accordance with the risks and trends of the organized crime

Performance Indicators: prevention measures performed; risk analysis reports developed therein

Timescale for completion: 2017–2020

In order to assess the progress of the implementation of the sub-action no. 4.1.7, we will refer to the prevention measures conducted in 2019, which should comply with the organized crime trends found in 2018. Thus, according to the information note on the activity in the field of prevention of organized crime and development of the phenomenon thereof in the course of 2018⁶⁴, in line with the degree of increase or decrease in the status of organized crime, a high level of crime was seen in the following categories of offenses:

- offences against personal liberty (286)
- trafficking in human beings (143)
- sexual violence (328)
- blackmail (95)
- car robbery (367)
- taking children abroad illegally (22)
- offences against public health (1421)

⁶³ No modernization works being carried out for police stations or provisional detention isolators located in the same headquarters

⁶⁴ <https://bit.ly/2w0MrKG>

- offences related to drugs (1296)
- smuggling (39)
- passive corruption (26)
- illegal crossing of the State border (287)
- offences against military obligations (101)

According to the Police Activity Report, 18 campaigns, **2 955** information, awareness raising **activities** were organized and carried out and more than **180 thousand citizens** has been informed in 2019. The majority of campaigns carried out were organized in partnership with non-governmental organizations.

Table no.12. *Information and awareness raising campaigns*

The campaign aim	Campaigns and operations conducted in 2019 to prevent organized crime
Preventing domestic violence	1. "16 Days of Activism Against Gender-Based Violence" International Campaign 2. "An awareness-raising campaign targeting the civil society on the harm caused by family conflicts"
Child safety and protection – preventing juvenile delinquency, reducing the level of victimization	1. Child+street-liberty or illusion? 2. "Schooled child - protected child" 3. A toy to make children smile 4. "Care" Operation
Road Safety	1. "Let's drive safe & smart!" 2. "An awareness-raising campaign targeting minor children on complying with traffic rules" <i>Special Operations:</i> 3. "Speed" 4. "White Nights" 5. "Zero alcohol" 6. "Fighting against cases of illicit passenger transportation, (Taxi)" 7. "The single center for monitoring and control under the NPI checking on drivers having unpaid fines" 8. "The pedestrian" 9. "Flashing light", 10. "Window film" 11. "Be different - prudent and responsible" 12. "Slow down - every life matters", 13. "Drive your child safely" 14. "The bus" 15. "Muleteers" 16. "Xenon" 17. "RADAR" 18. "Railway passage" 19. "Bribery (both giving and receiving bribes) - a felony, punishable by a state prison"
Prevention of robberies and burglaries	"Your safety matters!"
Reducing drug use and diminishing HIV risks	1. "Antidrug" 2. "MAC-2019"
Surveillance of firearms for civilian use - prevention of incidents with the use and application of firearms	1. "Now is the time, hand over the weapon!" 2. Help Moldova become a safer country"
Improving dialogue with citizens, community policing, increasing civic responsibility	1. "Police behind the scenes"; 2. The program entitled "Neighborhood Surveillance" 3. Coffee With A Cop 4. "Caring Grannies"

	5. "Safety Alley" 6. An awareness-raising campaign targeting both the objectives and achievements of Police Reform
Preventing corruption in police	1. We say NO to corruption in police 2. "Police officers of good repute and integrity – protected citizens"
Others	1. The national charity campaign "Christmas Caravan" 2. Cascada Operation 3. Search operation 4. "Begging" operation 5. Operation on combating the traffic of goods across the borders of the Republic of Moldova on the Transnistrian segment "Dniester 2019"

Also, during the reporting period, police officers conducted about **7200 searches** in the context of programs and projects to discourage criminal behavior through the massive presence of police officers and activities to prevent and combat the phenomenon of organized crime, and restore the level of security in the community.

The table below shows the number of information and awareness-raising activities, of leaflets distributed therein, the number of beneficiaries and the number of publications made in the media in 2019:

Table no. 13. *The number of information and awareness-raising activities*

The purpose of the activities carried out	Information and awareness-raising activities	Number of beneficiaries	Number of leaflets distributed therein	Publications in the media (written, TV, radio)
Child safety and protection – preventing juvenile delinquency, reducing the level of victimization	9 367	422 435	215 005	1336
Preventing Domestic Violence	24 767	104 546	59 190	267
Promoting anti-tobacco policy	15 622	63 300	21 974	145
Preventing alcohol consumption and reducing its consequences	4021	48 256	27 814	266
Surveillance of the circulation of firearms for civilian use - prevention of incidents with the use and application of firearms	2 269	29 402	25 652	137
Reducing drug use and diminishing HIV risks	3607	35 289	16 074	181

According to the data in the Table no. 13 and in line with the activity on preventing organized crime under the risks and trends thereof, we can conclude that the highest risk of organized crime in 2019, as in previous years, was registered in juvenile delinquency, being necessary to ensure both the safety and the protection of children. According to the GIP, 664 crimes were committed by minors and with the participation of minors during 2019, which represents a decrease of 3.49%, compared to the analogous period of 2018 (688 crimes).

On the same lines, according to the Information Note on the activity on preventing organized crime and development of the phenomenon thereof in the course of 2019⁶⁵, 33 information campaigns have been initiated locally by 15 territorial subdivisions of the Police.

Promo-LEX Association welcomes the conduct of local campaigns on preventing organized crime depending on the level of crime in a region and further recommends to the implementing institutions organizing and conducting long-term campaigns on preventing crimes, apart from those organized jointly with or civil society as well as objectively assessing the results of the prevention activities conducted therein. Additionally, Promo-LEX draws attention to the need to report herein both the number and deadline of the risk analysis reports developed.

4.2. Developing the Intelligence-led policing concept and extending it throughout the entire territory of the Republic of Moldova.

4.2.2. Participating in the implementation of twinning (institutional twinning) projects on the implementation of the intelligence-led policing concept

Performance indicators: projects developed and implemented therein

Timescale for completion: 2017–2019

According to the progress report for the implementation of the PDS, no data have been reported in respect of this activity in 2019.

According to the answer of 26th of March 2020 to the request for information submitted by Promo-LEX on the activities conducted for the implementation of the sub-action 4.2.2, the GIP stated that in February 2019, an international expert was contracted with a view to preparing the Needs Assessment Report for the implementation of the ILP Concept at national level via Technical Assistance project granted by the EU. The report thereof has been prepared and approved. On the same lines, the second phase of the mission related to the description of technical parameters of the equipment required to implement the ILP, has been postponed, due to objective circumstances that changed the agenda of the expert.

In addition, according to the GIP, the project thereof shall be supported by the Technical Assistance and Twinning Projects during the implementation of the Budget Support Program. The ILP area was to be part of the Program, which was approved after the approval of the Police Development Strategy, but was not included in the list of top priorities, as it was a component of the Technical Assistance Project.

Thus, the twinning (institutional twinning) project on the implementation of the intelligence-led policing concept has neither been accepted nor signed by the parties.

*Thus, Promo-LEX Association qualifies **this sub-action as unfulfilled** and recommends the implementing institutions continuing its efforts in developing the Intelligence- led- policing concept, as well as extending it throughout the country.*

4.2.3. Reorganization of information analysis structures.

Performance Indicators: Information Analysis Center reorganized as a central unit subordinated to the General Inspectorate of Police; regional structures established and operationalized therein

Timescale for completion: 2017

According to the progress report for the implementation of the PDS, by Government Decision no. 547 of 12.11.2019 on the organization and functioning of the General Inspectorate of Police, have

⁶⁵ <https://bit.ly/33YoC2Q>

been approved the GIP Structure, the Regulation on the organization and functioning of the GIP, List of the territorial subdivisions of the Police subordinated to the GPI and the organizational structure of the GIP.

The new organizational structure of the GIP includes new structures at the level of the Police control and management central unit, including the Information Analysis Department.

According to the GIP answer of 26th of March 2020 to the request for information submitted by Promo-LEX, following the endorsement of the staffing table of the GIP in the State Chancellery, the new structure was put into effect under the MIA Order no. 83 of 17th February 2020 on the personnel of the GIP. In accordance with the newly approved structure, the Information Analysis Department within the GIP is the subdivision responsible for ensuring the analysis of data and information on crime from a strategic point of view.

According to the GIP, the Information Analysis Department was not established through the reorganization of the Information Analysis Center in the NII, the latter further being responsible for performing the information analysis, but directed towards giving them a foundation and enforcing the decisions in the short term, with an immediate impact due to exploitation of data and information. The activity of the Information Analysis Center involves identifying and combating illegal activities, through the support offered to structural subdivisions of the NII, regional divisions and territorial investigation subdivisions.

For the purposes of the sub-action 4.2.3 and performance indicators set in respect thereof, Promo-LEX Association highlights that a new central unit subordinated to the GIP in the field of information analysis was established by approving the new structure of the GIP, but not through the reorganization of the Information Analysis Center (IAC) in the NII, as it was provided by the performance indicator. For this reason, but also, due to the failure to establish and put into operation the information analysis regional structures, the sub-action 4.2.3 could not be regarded as fully fulfilled. It should be noted that such information analysis structures have already been established at the level of each police inspectorate in 2013. However, so far no adjustments have been made in relation to the regionalization of the aforementioned structures.

*In light of the foregoing, Promo-LEX Association qualifies **the sub-action no. 4.2.3. as partially fulfilled** and recommends the General Inspectorate of Police operationalizing the new structure of information analysis and creating the respective regional structures.*

4.2.4. Strengthening risk analysis capabilities

Performance Indicator: specialized structure established and operationalized therein

Timescale for completion: 2017–2018

The Risk Analysis and Information Management Division has been established within the Operational Management Directorate of the GIP under the Government Decision no. 547 of 12.11.2019 on the organization and functioning of the General Inspectorate of Police. According to the GIP, it shall be responsible for permanent monitoring and complex analysis of the criminal phenomenon and public events, identifying risks and making proposals for effective planning of response measures and substantiating the decisions of the management of the General Inspectorate of Police.

Taking into account that the new structure of the GIP, including the Risk Analysis Division, have been implemented in February 2020 under the MIA Order no. 83 on the staffing plan of the GIP, we note that the specialized structure for risk analysis has been established following the approval of the new structure of the GIP, but the operationalization of the risk analysis structure did not take place in 2019. Moreover, its risk analysis capabilities could not be strengthened.

*Thus, Promo-LEX Association qualifies **the sub-action no. 4.2.4 as partially fulfilled**.*

4.2.5. Improving operational and tactical analysis capabilities

Performance Indicators: trainings organized and conducted therein; specialized equipment purchased and dedicated information applications implemented therein; standard operating procedures on the collection of information established therein

Timescale for completion: 2019–2020

According to the Progress Report for the implementation of the PDS, several trainings in risk, operational and tactical analysis have been organized and conducted in 2019. These are as follows:

- Training course “Management of police subdivisions”, organized at the Academy “Stefan cel Mare” of the MIA. According to the training plan, 20 employees from the operational management services received training in:
- “Strategic and Operational Planning. Risk, operational and tactical analysis.”
- 2 trainings attended by 30 employees, on the topic “Analysis of information. Evolution and actuality. Necessity and efficiency of the implementation of this field in the activity”;
- 1 training attended by 50 employees, on the topic “Analysis of information. Evolution and actuality. Necessity and efficiency of the implementation of this field in the activity”;
- training course “Risk Management Systems in the field of Public Order” attended by 9 employees from the NII subdivisions and the Special Destination Police Brigade “Fulger” of the GIP.

During 2019 there were organized and conducted 6 training courses for investigation officers in which 117 employees received training.

We note that by the GIP Order no. 265 of 08.06.2018, the Concept of signaling threats and vulnerabilities to public order and community safety entitled the “**Threat Map**”⁶⁶ has been approved therein. Since the launch date (22.08.2018) until the end of 2018, **775** warnings about threats and vulnerabilities found by citizens have been reported therein, while according to the Police Activity Report, during 2019, 661 warnings reported by the society have been found therein.

According to the results of interviews conducted with the management of Police Inspectorates, 33 (80.5%) of the respondents stated that they use the Threat Map online application, whilst 8 (19.5%) of the respondents declared that they do not use it, because it is obsolete and has an unattractive design, there is no need to use it and very few people know about it.

Of the interviewees who stated that they use the application, 24 declared that the application is useful, necessary or they use it when needed, including for involving the patrol team, rational activity planning and orientation towards concrete directions/actions and areas. However, at least four respondents who declared it was useful, mentioned that citizens do not know about this application, do not use it, or use it very little.

On the same lines, eight respondents who mentioned that they use the application, stated that the usefulness of the application is limited, not useful/irrelevant, there are no real threat points, erroneous data are intentionally entered and citizens do not use it.

⁶⁶ <https://bit.ly/2KxIPo1>

Table no. 14. Results of the interview on the use of the Threat Map online application

Use of the Threat Map online application		
People using it	33 (80.5%)	24 (finding it useful, efficient), of whom 4 – stated that citizens do not know about it)
		8 (limited use, irrelevant)
People not using it	8 (19.5%)	

Promo-LEX Association welcomes the conduct of training courses in risk, operational and tactical analysis. However, taking into account the deadline for the implementation of the sub-action and Action Plan for the implementation of the PDS, we recommend carrying out the necessary actions with a view to achieving all indicators, including those on the purchase of the specialized equipment, effective implementation of dedicated information applications, establishment of standard operating procedures on the collection of information. Additionally, Promo-LEX repeats its recommendation for developing and promoting the “Threat Map” so that the citizens of the Republic of Moldova be able to use it effectively, make warnings that shall meet their expectations and increase community safety.

4.2.8. Purchase of special equipment and technical devices

Performance Indicators: both special equipment and technical devices purchased therein

Timescale for completion: 2017–2019

According to the Progress Report for the implementation of the PDS, with a view to achieving this sub-action in 2019, 90 phones (smartphones) and 20 power banks have been granted to the NII of the GIP.

We note that procurement of the same devices have been reported in both this sub-action and sub-action 3.1.1. In this respect, it is recalled that in the Report no. 1 on the civic monitoring of Police Reform⁶⁷, Promo-LEX recommended avoiding such practices and advised reflecting in this sub-action the information on the purchase of the specialized equipment and technical devices only, serving to achieve the main action – Developing the Intelligence-led policing concept and extending it throughout the entire territory of the Republic of Moldova.

Thus, we note that, on 27th of July 2017, the (2017-2020) Action Plan on the implementation of the Intelligence-led policing concept has been approved, under which, the following specialized equipment and technical devices were to be purchased:

- purchasing and implementing the specialized software development services for the Public Order and Security component by expanding the existing (INFOPOL) system and creating a single GIP database;
- purchasing and implementing the services for the elaboration of the specialized software for recording the persons detained by the police, by expanding the existing (INFOPOL) system;
- assessing and purchasing technical equipment (computers, printers, connection elements, etc.) for investigation subdivisions and for those ensuring public order and security (at both local and regional levels);
- ensuring the endowment with specialized software equipment in the field of tactical analysis (hotspots, case comparisons), connected to the necessary information systems;
- developing an information system for monitoring activities and establishing activity guidelines.

⁶⁷ <https://bit.ly/2R2naXT>

We note that the aforementioned Progress Report on the implementation of the previously mentioned Action Plan is not available in the public domain, whilst the request for information submitted to the GIP on providing the report thereof, if available, was not fulfilled.

Additionally, Promo-LEX have sent requests for information to police inspectorates, including on the specialized equipment and technical devices purchased/allocated between 2017 and 2019 for the development of the Intelligence-led policing concept. According to the replies, 12 representatives of police inspectorates stated that computers and printers have been purchased and/or allocated to them. Moreover, representatives of some subdivisions declared that information applications/systems required for the activity of police have been installed therein. Whilst in relation to requests thereof, employees of some subdivisions stated the need for conducting trainings on the use of the investigation equipment as well as of high-performance software.

*Starting from the fact that the indicator set forth by the action plan for the implementation of the sub-action hereof is a general one, and do not provide for the number and type of the equipment proposed to be purchased, **Promo-LEX Association cannot assign any rating on the achievement of this sub-action.***

4.2.9. Implementation of Police voice-data communication network.

Performance Indicator: network created and operationalized therein

Timescale for completion: 2019–2020

According to the progress report for the implementation of the PDS, the following actions have been performed for establishing and operationalizing the TETRA network in 2019:

- all equipment expected for 2019 plus equipment expected for 2020 were delivered;
- detailed site design in the candidate locations nominated for the installation of base stations and radio links was performed;
- technical expertise of 22 candidate locations for 2019 was made;
- collocation contracts and additional agreements to existing contracts with National Telecommunications Operators for the installation of TETRA equipment have been concluded;
- the necessary authorisations for base station installations and radio connections were granted;
- all TETRA system errors after installation and commissioning of SwMI equipment in full configuration with 2 georedundant zones in the MSO-A and MSO-B location were tested and rectified;
- 16 TETRA base stations and 14 radio links have been installed, configured and operated.

Promo-LEX notes that the sub-action 4.2.9 in the Action Plan on the implementation of the PDS coincides with the objective A.4.2. in the Policy Matrix for the implementation of the Budget Support Program “Ensuring reliable and efficient communication for operational purposes within the Police”. Hence, both the degree of achievement and conclusions thereof are formulated within the same objective and will not be resumed in this sub-action.

However, we highlight the fact that activities conducted for the implementation of TETRA system are welcomed, therefore, Promo-LEX recommends continuing the efforts in providing the GIP subdivisions with TETRA equipment, but also conducting proper training for persons engaged in operative reactionary activities.

4.2.10 Development of Police Integrated Computer System

Performance Indicator: system developed therein

Timescale for completion: 2017–2020

According to the report for the implementation of the PDS, in 2017 with the support of UNDP, within the project “Support for police reform”, the design of LAN networks for 44 territorial subdivisions of the police was carried out. Given the capital construction work carried out at the Criuleni and Telenesti police inspectorates, in 2018, 2 of the 44 LAN execution projects received were implemented.

During 2019 it was possible to connect 106 objectives located at the GIP records or subordinated units to the WAN system of MIA. This will allow the interconnection of LAN networks and ensure a secure flow of information, in particular in the process of database interpellation.

On the same lines, for 2020, through financing project, it is planned to implement at least 9 projects in the police inspectorates located in the area bordering the Dniester River.

In conclusion, Promo-LEX Association recommends continuing the efforts required for the implementation of LAN execution projects in the subdivisions of the Police. However, we draw attention to the risk of not reaching the indicator set in order to achieve the sub-action 4.2.10 in 2020.

4.3. Consolidation of the patrol, reaction and intervention capabilities of Police to the call of the citizens.

4.3.1. Reorganization of the National Patrolling Inspectorate through the decentralization of the patrol structures

Performance Indicators: National Patrolling Inspectorate of the General Inspectorate of Police reorganized therein

Timescale for completion: second half of 2016 – first half of 2017

On 12.11.2019, the Government Decision no. 547 on the organization and functioning of the General Inspectorate of Police has been approved⁶⁸ and entered into force on 22.12.2019. According to section 3 of the aforementioned decision, the list of specialized subdivisions of the General Inspectorate of Police, limit on the number of employees and territorial subdivisions shall be set by the Minister of Internal Affairs, within the limits of the budget approved and limit on the number of employees. We note that granting to the Minister of Internal Affairs, who is eminently a political figure, the right to make changes in specialized structures of the Police, could put the General Inspectorate of Police and subdivisions thereof at the risk of being politicised.

According to the Progress Report for the implementation of the PDS, by the order of the MIA no. 821 of 27.12.19, the list of specialized subdivisions of the General Inspectorate of Police was approved. Through this document was created, including the National Public Security Inspectorate as a subdivision with general territorial competence of the General Inspectorate of Police which has legal personality.

According to the GIP reply as of 26th of March 2020 to the request for information submitted by Promo-LEX, the staff of the NPSI is in the process of analysis and subsequent endorsement at the State Chancellery, and until the approval of the new structure, the NPI shall operate in compliance with both functions and powers set out in the existing Regulation on the organization and functioning thereof. The GIP also mentioned that during 2019, 149 personnel units were assigned to territorial patrolling subdivisions with a view to strengthening the functional capacities and ensuring an operative response to all emergency calls from citizens.

It is recalled that according to the *vision on deconcentrating the activities of public order and security to the level of the territorial subdivisions of the Police as well as establishing the National*

⁶⁸ <https://bit.ly/3aA9Mlo>

Public Security Inspectorate within the General Inspectorate of Police, the logical order developed in 2018 on the on the implementation of the actions thereof is as follows:

- 1) establishing the NPSI within the GIP by merging the NPI and GDPS;
- 2) deconcentrating the activities of public order and security by granting to territorial subdivisions of the Police of competences and personnel resources required to manage the situation at a local level.

*In light of the foregoing, the Promo-LEX Association qualifies this **sub-action as partially fulfilled** and recommends the implementing insitutions undertaking the necessary efforts to deconcentrate the activities of public order and security under the aforementioned Vision.*

4.3.3. Improvement of the communication capacities of the staff involved in the integrated management of urgent calls

Performance Indicators: trainings organized and conducted therein

Timescale for completion: 2017–2020

According to the report for the implementation of the PDS, in 2019 several training courses have been conducted therein, which were attended by 89 employees. These were as follows:

- 1) the training course “Intervention of Police Employees to calls or complaints about acts of violence”, organized by the Academy “Stefan cel Mare”;
- 2) training course entitled “Management of public services”
- 3) training/specialization course on the topic “Management of police subdivisions”;
- 4) training/specialization course entitled “Operational management”;
- 5) training course entitled “Document and archive management systems”.

Taking into account the aforementioned as well as trainings conducted in previous years, Promo-LEX reveals that according to sub-action 4.3.3, the trainings organized and conducted therein should aim at improving the communication skills of the staff involved in the receipt of emergency calls. In this connection, the expectations aim at organizing and carrying out dedicated training specific to the way of communication of the people involved in the management of emergency calls. Additionally, Promo-LEX Association reiterates its recommendation on periodically resuming the action made in 2016 on making check calls, in order to assess the real evolution of the communication capacities of the personnel involved in taking emergency calls and the impact of the trainings conducted in respect thereof.

Based on the Policy Matrix

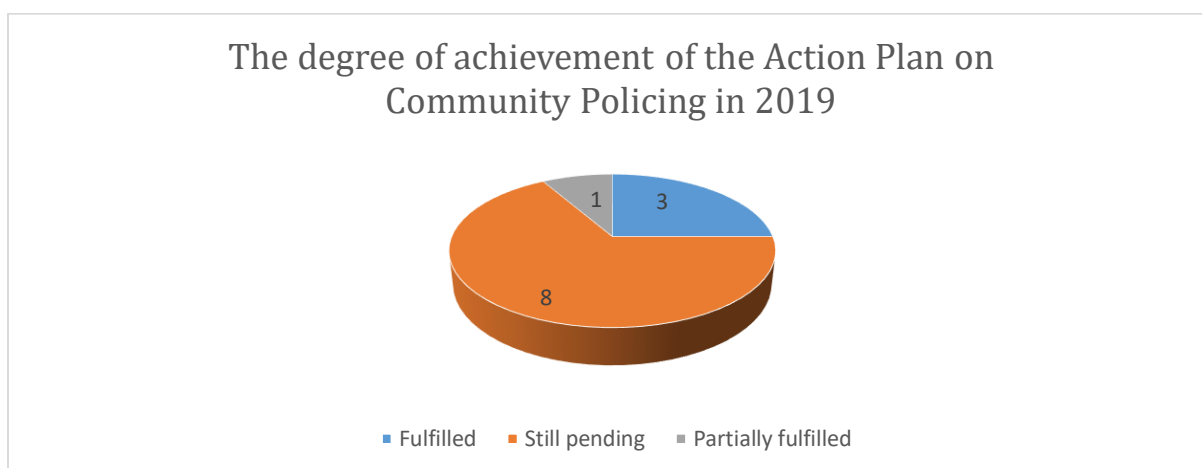
A.4.1. Implementing the concept of Community Policing, by enhancing physical and informational access to equal and quality Police services throughout the country.

2019 Indicator: at least 200 police officers received training in the field of community policing as well as a promotion campaign for the general public has been conducted in all 42 Police Inspectorates

The annual progress report on the implementation of the Action Plan on Community Policing has been published on politia.md website,⁶⁹ the degree of achievement thereof being shown in the Chart below.

⁶⁹ <https://bit.ly/2R0ubs7>

Chart no. 19. *The degree of achievement of the Action Plan on Community Policing in 2019 under the progress report*



According to the report for the implementation of the 2019 Budget Support Program, major achievements are as follows:

- ✓ approval of the curriculum in the field of community policing and training conducted for 240 employees within police stations under the aforementioned curriculum;
- ✓ campaign to promote community policing in all 42 police inspectorates, being also conducted 342 events for watching the documentary movie on community policing attended by 12237 citizens residing in 754 villages/towns. Also, 933 meetings were conducted being attended by 22491 citizens, who have been acquainted with the work of community policing, 174 events entitled “Coffee with a Cop” have been organized being attended by 4612 citizens;
- ✓ heads and employees of territorial subdivisions of Police participating in 27 public TV shows on community policing. We note that, according to information obtained out of replies provided by the representatives of territorial subdivisions to the request for information submitted by Promo-LEX, the heads of at least 14 (33%) police inspectorates did not attend any local radio or TV show in 2019 dedicated to community policing, one of the most common reasons being the lack of such local radio/TV stations addressing the issue thereof. On the same lines, the heads of at least five police inspectorates (Anenii- Noi PI, Floresti PI, Leova PI, Singerei PI, Rezina PI) (11.9%) participated in at least one TV show addressing this topic;
- ✓ 6 design-build services for the repair of police stations were contracted by police inspectorates, in total being designed 63 police stations;
- ✓ repair works were carried out in 14 police stations, while 12 police stations were declared fully operational.

*In light of the foregoing, Promo-LEX welcomes the efforts made on conducting community policing awareness-raising campaigns aimed at citizens but also on organizing proper trainings under the curriculum intended for the police staff. Thus, **we qualify the performance indicators set in the action A.4.1. for 2019 as fulfilled.***

Additionally, we note that during the period from November 2019 to March 2020, the police stations renovated in 2019, were visited by Promo-LEX monitors, being assessed the compliance with the Concept on technical functioning requirements of the Police Station, approved by the GIP Order no.286 of 22 June 2018.

Table no. 15. Police stations that were renovated during the year 2019

No.	Police Inspectorate	Police Station	The date of placing in service the police station	Total area of the headquarters (m ²)	Total number of employees according to the staffing plan	Number of employees at the time of the visit	Number of vehicles available
1.	Riscani PI (Chisinau)	no. 4	13/02/2019	243	15	9	1
2.	Causeni PI	no. 1 Causeni	04/04/2019	252	11	10	2
3.	Soroca PI	no. 1 Soroca	18/04/2019	90	23	18	2
4.	Basarabasca PI	no. 1 Basarabasca	22/08/2019	120	8	5	2
5.	Drochia PI	no. 1 Drochia	18/09/2019	240	15	10	2
6.	Donduseni PI	no. 1 Donduseni	18/09/2019	120	13	11	4
7.	Floresti PI	no. 1 Floresti	01/10/2019	80	11	11	1
8.	Comrat PI	no. 1 Comrat	03/10/2019	65	12	8	1
9.	Anenii Noi PI	no. 5 Serpeni	08/10/2019	117	8	4	2
10.	Telenesti PI	no. 1 Mindresti	10/10/2019	100	13	11	3
11.	Soldanesti PI	no. 1 Soldanesti	31/10/2019	85	9	7	1
12.	Ialoveni PI	no. 3 Costesti	08/11/2019	96	11	7	3
13.	Falesti PI	no. 1 Falesti	24/12/2019	272	10	9	1
14.	Cimislia PI	nr. 1 Cimislia	26/12/2019	100	9	4	1

Taking into account the findings of the monitors on the compliance of police stations with the technical functioning requirements (Annex 8), Promo-LEX concludes that the police stations, which were renovated ensure to a large extent conditions for carrying out the police activity, including the community one, the working conditions for employees being substantially improved. However, referring to the technical functioning requirements of the Police Station, approved by the GIP Order no. 286 of 22 June 2018, we find that no police station fully complies with the requirements laid down therein. We note that, police stations no.1 in Falesti, no. 3 in Costesti, Ialoveni, no. 1 in Soldanesti, no. 1 in Basarabasca, no. 1 in Donduseni, do not meet two requirements each of those assessed by Promo-LEX monitors, these covering the lack of road signs indicating the location of the headquarters of the Police Station, lack of the information board or failure to match the limits applied to the total area set for police stations.

Additionally, we stress that although the efforts made in renovating the police stations are considerable, there is a risk of failure to achieve the indicator covering the renovation of 90 police stations. Promo-LEX recommends, inter alia, examining the possibility to organize and conduct procurement procedures for renovation services in respect of police stations by the territorial subdivision concerned (at least in the case of police stations subordinated to Police Directorates).

A.4.2. Ensuring reliable and efficient communications for operational purposes within the Police

2019 Indicator: the network for the pilot phase has been selected, the latter being completed and assessed in at least three Police Inspectorates.

2020 Indicator: Secure communication system fully implemented.

The report on the assessment of the pilot phase within the project entitled “Ensuring a reliable and efficient communication system for operational purposes within the Police” ⁷⁰ as well as the

⁷⁰ <https://bit.ly/2WWKtWT>

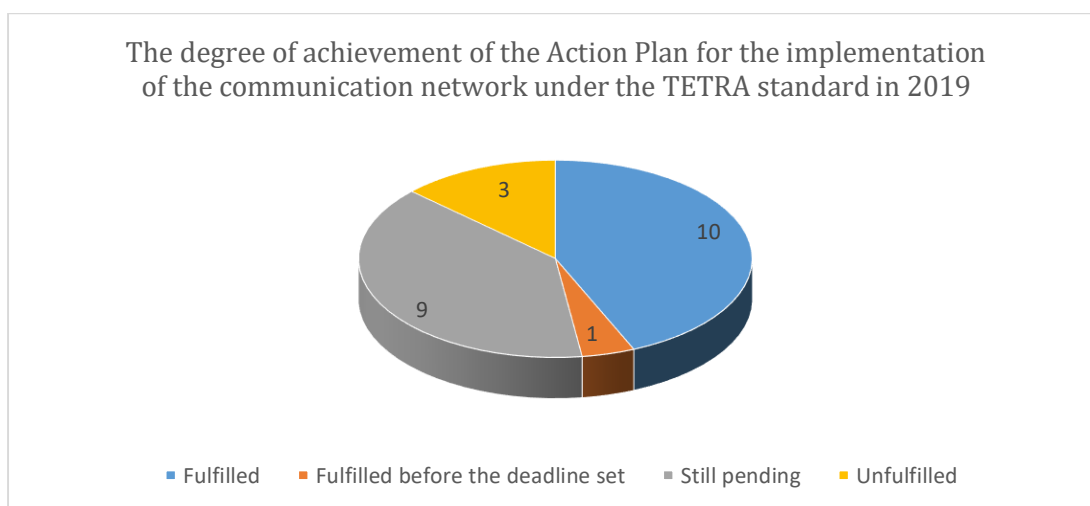
Progress Report for the implementation of the MIA Action Plan on the implementation of the communication network under the TETRA standard within the MIA⁷¹ have been published on politia.md website.

According to the report on the assessment of the pilot phase, at the end of 2019, the TETRA system comprised 87 base stations providing a coverage of approximately 60-65% at the level of portable terminal and 75% at the level of mobile terminal being used in their daily work by several police inspectorates, the main ones being the Inspectorates of Chisinau municipality, Police Directorate of Chisinau municipality, Balti PI, Cahul PI. Below, we highlight the following important conclusions made in this report:

- the current level of endowment with TETRA equipment (917 units) is insufficient, the required number of radio terminals being 2950 units; at the moment the endowment with tetra terminals in percentage ratio with the necessary one is 31%;
- the communication time between the dispatcher and the reaction team has been significantly reduced in PIs, which were provided with TETRA equipment;
- the inability to fully use the TETRA terminals was attested, due to the insufficiency of the trainings;
- taking into account the fluctuation of police staff, it was considered that the trainings to be carried out during 2020 were not sufficient, and that ongoing trainings are required to be conducted in the initial training courses;
- the lack of technical staff able to manage the fleet of TETRA terminals at central and regional level was attested, which makes it difficult to use the TETRA network at full capacity.

At the same time, the chart below shows the degree of achievement of the Action Plan under the MIA progress report on the implementation of the communication network under the TETRA standard within the MIA.

Chart no. 20. *The degree of achievement of the Action Plan for the implementation of the communication network in 2019*



We note that in territorial aspects, according to the report on the assessment of the pilot phase, 19 police inspectorates or 45.23 % were provided with TETRA equipment.

⁷¹ <https://bit.ly/39uiuR6>

On the same lines, according to the interviewees in the Police Inspectorates, 21 (51.2%) of the territorial subdivisions of the GIP have been provided with Tetra equipment between 2017 and 2019, while 20 (48.78%) other have not been provided with Tetra equipment.

At the same time, when asked about the implementation and the extent to which the Tetra equipment is used, advantages/disadvantages thereof, at least 3 of the respondents stated that it is not used, including due to the lack of network coverage.

Table no.16. Advantages/disadvantages of using the TETRA equipment

Advantages	Disadvantages
<ul style="list-style-type: none"> ✓ Secure communication regime between collaborators; ✓ High mobility and reduced intervention time; ✓ Increasing the speed of reaction; ✓ Ensuring a permanent connection between collaborators, including with the on-call service; ✓ Using the equipment in areas not covered by the mobile network; ✓ Operative and fast transmission of information; ✓ Improving communication, by receiving the same information by those involved in the service; ✓ Reducing costs for communication services through fixed and mobile telephone networks. 	<ul style="list-style-type: none"> ✓ Low capacity of energy storage batteries⁷²; ✓ Pre-existing wear of the delivered equipment (1) ; ✓ Lack of coverage of the Tetra network in some areas, especially in settlements located in the border area.

Most of the interviewees appreciated the TETRA equipment as useful in application and functional one. Regarding the use of the equipment, at least four interviewees reported using the TETRA equipment as needed.

*In light of the foregoing, Promo-LEX Association concludes **that the performance indicator has been achieved** and welcomes the efforts made in ensuring a reliable and efficient communication system for operational purposes within the Police. Also, Promo-LEX recommends continuing making efforts for providing the subdivisions of the GIP with TETRA equipment as well as conducting proper training for persons engaged in operative reactionary activities.*

A.4.3. Improving the communication capacities for rapid reaction of intervention teams of the Police when taking the emergency calls

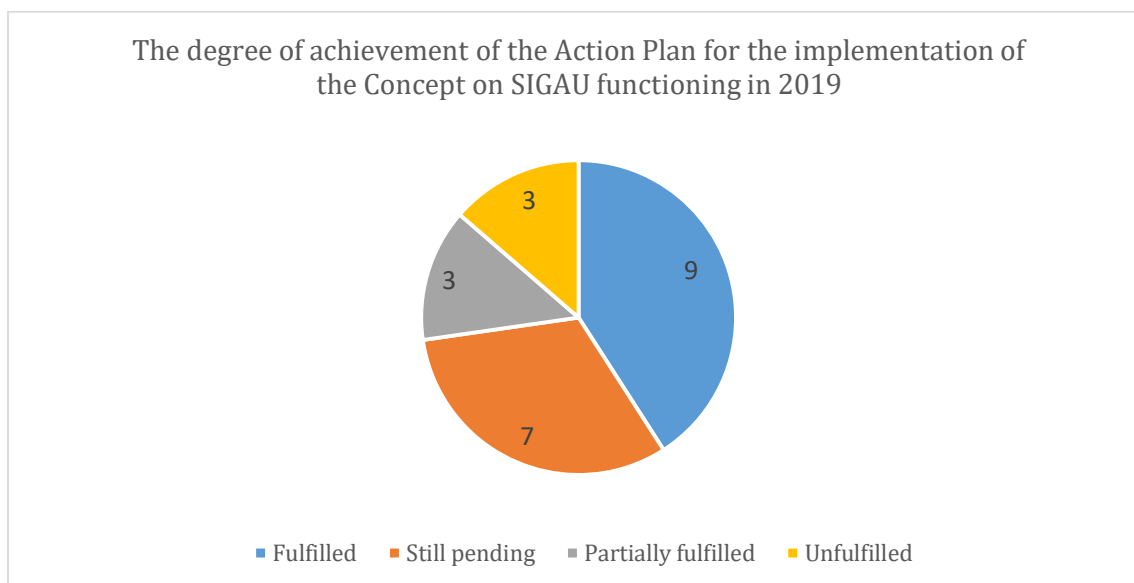
2019 Indicator: the Action Plan was implemented under the indicators set; 6-month pilot phase for SIGAU in 2 major urban centres and 2 rural areas was completed and the ongoing training on SIGAU for the dispatching staff was assessed therein.

The report on the implementation in 2019 of the project 4.3. Improving the capacities for rapid reaction of intervention teams of the Police when taking the emergency calls has been published on politia.md website.⁷³

⁷² "Weak batteries. Draining very fast."

⁷³ <https://bit.ly/2lpoY99>

Chart no. 21. *The degree of achievement of the Action Plan for the implementation of the Concept on SIGAU functioning according to the progress report*



We note that there is neither a report of the implementing institutions on the achievement of the 6-month pilot phase for SIGAU in 2 major urban centres and 2 rural areas, nor on the assessment of ongoing trainings on SIGAU for the dispatching staff that have been published. When the GIP was asked to provide information on the submission of the report on the assessment of ongoing trainings on SIGAU as well as on the report on the assessment of the pilot phase, approved by the MIA, if available, no documents have been submitted in respect thereof. We point out that neither the report on the implementation of the 2019 budget support program, contains conclusions on the aspects set by the performance indicator. **Thus, Promo-LEX concludes that the performance indicators set by the Policy Matrix for the action A.4.3. have been partially achieved in 2019.**

Promo-LEX observes that on the 7th of May 2018, the Manual on primary response to emergency calls has been approved by the GIP Order no. 232. According to the order thereof, the heads of PIs, with the exception of those from Chisinau mun., shall:

- 1) create at least two patrolling and operative reactionary teams (one to operatively cover the district centre), on a 24 hour/7 day basis, jointly engaging the employees of the subordinate patrolling subdivisions and traffic supervision and road safety subdivision, corresponding to the number of the available staff;
- 2) provide both patrolling and operative reactionary teams as a matter of priority with special vehicles managed by Patrol Bureaus of Public Security Divisions in the PI;
- 3) review the provision of weather-appropriate work uniforms to employees of the subordinate patrolling and traffic supervision and road safety services.

The order also provides for the organization of joint patrolling and operative reactionary teams on the territory of Balti mun. and the North Regiment of the NPI, by using the Police special vehicles managed by Patrol Service of Balti mun. PI in its work activities.

According to the Manual developed to this end, the primary operative response will take place by directing the nearest patrolling and operative reactionary team of the Police or any other available police teams, who are located closest to the place where the urgency occurred. The crews of the National Patrol Inspectorate were to be instructed in this connection as patrolling and operative reactionary teams, within the perimeter of the patrolling itineraries established according to the daily dislocation. The engagement of the employees of the police stations as a resource for primary response to emergency calls was to take place during their established activity program, taking into account the operative reactionary capacities of the subdivision. At the same time, the

principles laid down in the aforementioned Manual will be applicable **during the pre-piloting and piloting period** of the dispatching activity of the operative reactionary forces of the Police, with subsequent adaptation thereof as a result of the reorganization measures or use of the dedicated computer application.

With a view to evaluating the results of the application of the single principles of primary response to emergency calls during 2019, Promo-LEX monitors conducted interviews with the management of territorial police subdivisions and made visits and conducted interviews within the Regional Dispatching Centres. Also on the 6th of March 2020, Promo-LEX submitted a request for information to 112 emergency service on the average duration of response of police services to urgent calls of citizens in 2019, in each territorial administrative unit (district/municipality), the latter refusing to provide them with such information without giving any reason and contrary to applicable legal provisions.⁷⁴

On piloting the single principle of primary response to emergency calls

When the management of police inspectorates was asked about both advantages and disadvantages on **piloting the single concept of primary response to emergency calls**, and engagement of the NPI crews as patrolling and operative reactionary teams, within the perimeter of the patrolling itineraries the following were stated:

Table no.17. *Advantages/disadvantages of the single principle of primary response*

Advantages	Disadvantages, shortcomings
<ul style="list-style-type: none"> ✓ Exclusion of reaction duplications ✓ Prompt reaction and reduced reaction time ✓ Reduction of transport costs ✓ Ensuring the non-admission of destruction or loss of evidence in carrying out the actions necessary for the criminal prosecution. ✓ Good and professional collaboration between NPI and PI; ✓ NPI employees available in the territory 24/24; ✓ Presence of police in the territory; ✓ More professional way of working. 	<p>Regarding the NPI</p> <ul style="list-style-type: none"> ✓ Lack of professional training of the NPI teams for documenting on-site evidence, cases of violence, theft, murder, for intervention in operational cases; ✓ Lack of proper professional skills of NPI teams in undertaking operational measures, discovering crimes; ✓ Exclusive patrolling by the NPI of the main branch of the district center, and omission of patrolling other localities; ✓ Insufficient or incorrect documentation of cases by the NPI, documentation by the NPI, exclusively of road accidents and road traffic offences; ✓ Engaging the NPI employees in activities outside the pre-established patrol itinerary. ✓ The NPI teams not carrying out its activity 24/7; <p>Regarding the 112 Emergency Service and Regional Dispatching Centres of the Police</p> <ul style="list-style-type: none"> ✓ Unclear completion of information received from 112, or transmission of information contrary to competence, and as an effect inefficient use of time; ✓ Distortion of the information provided, provision of erroneous or incomplete information (including address), also due to lack of knowledge of the language of ethnic minorities (Gagauz, Bulgarian); ✓ Insufficient training of operators; ✓ Calls doubling, due to the fact that any information that comes to 112 is also recorded in the on-call unit; ✓ the existence of calls that do not even reach 112 / delay in the transmission of information by the 112 service or the Regional Dispatching Centre, and as a result, citizens call directly the PI. <p>Regarding the powers of the patrolling-reactionary teams:</p>

⁷⁴ See the chapter covering the Methodological issues in this report.

	✓ The lack of the possibility of verifying the veracity of the information received from the telephone calls, which has the effect of thwarting the trips and respectively increasing the expenses for management and transportation.
Suggestions	
✓	deconcentrating the NPI at the PI level;
✓	better training of persons employed with regional dispatching centres;
✓	training the NPI employees for performing reactionary activity;
✓	establishing standard operational procedures for regional dispatching centres, 112 service, to react operatively and correctly depending on the situation;
✓	granting powers of reaction to emergency calls to be assigned to territorial PI Patrol Services.

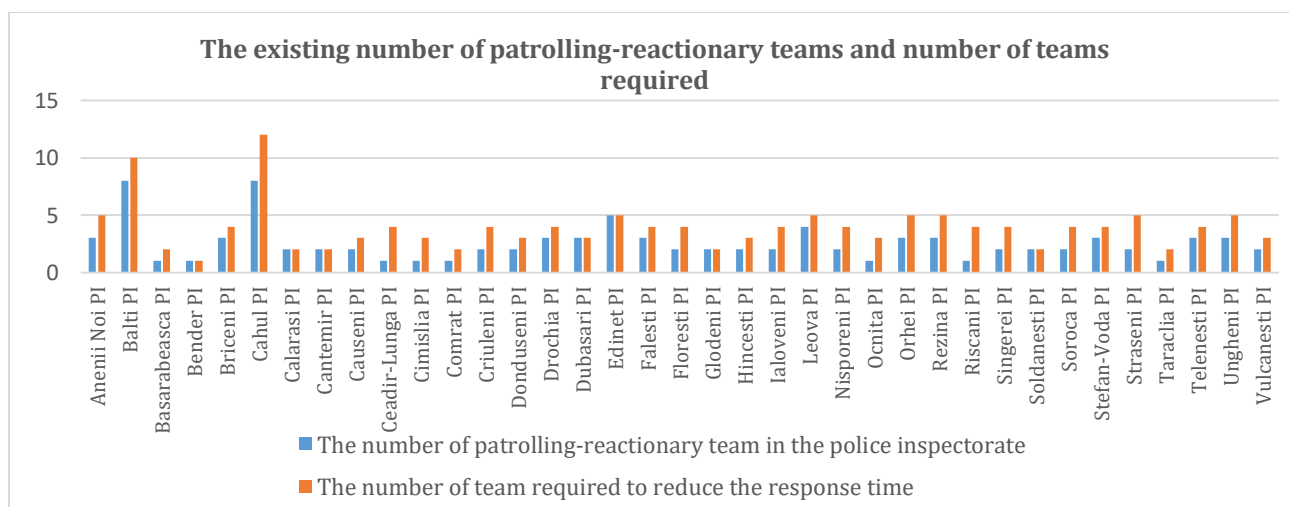
We note that on 11th of December 2019, the standard operational procedure on primary response of intervention teams to emergency calls has been approved under the GIP Order no. 483 with effect from the date of entry into force of the Government Decision no. 547/ 2019 on the organization and functioning of the General Inspectorate of Police.

On the number of patrolling-reactionary teams and response time to citizens' emergency calls

According to the results of interviews conducted with the management of police inspectorates to the question on the number of both the existing and required patrolling-reactionary teams, Promo-LEX noted the following:

- ✓ the police inspectorates of Bender, Calarasi, Cantemir, Dubasari, Edinet, Glodeni and Soldanesti have a sufficient number of patrolling-reactionary teams;
- ✓ the police inspectorates of Basarabasca, Briceni, Causeni, Comrat, Donduseni, Drochia, Falesti, Hincesti, Leova, Stefan-Voda, Taraclia, Telenesti and Vulcanesti need one more patrolling-reactionary team;
- ✓ the police inspectorates of Anenii-Noi, Balti, Cimislia, Criuleni, Floresti, Ialoveni, Nisporeni, Ocnita, Orhei, Rezina, Singerei, Soroca and Ungheni need two more patrolling-reactionary teams;
- ✓ the police inspectorates of Ceadir-Lunga, Riscani and Straseneni need three more patrolling-reactionary teams;
- ✓ the police inspectorate of Cahul needs four more patrolling-reactionary teams.

Chart no. 22. *The existing number of patrolling-reactionary teams and number of teams required to reduce the response time, according to the PI management*



On the same lines, in relation to the indicator set in the Policy Matrix for 2020, Promo-LEX points out that the police inspectorates of Bender, Basarabasca, Comrat, Taraclia, Cimislia, Ocnita, Ceadir-Lunga and Riscani still have one patrolling-reactionary teams each. (Annex no. 9) *Respectively, in order to achieve the established indicator, at least with regard to them, the implementing institutions should make necessary changes to supplement the number of patrolling-reactionary teams.*

According to the report for the implementation of the budget support program for Police Reform, the average response time to emergency calls at national level is 35 min. *Promo-LEX states that the number of patrolling-reactionary teams in each PI has a direct impact on the police average response time, and therefore recommends the implementing institutions examining the possibility of increasing the number of patrolling-reactionary teams and providing them with proper equipment, taking into account the suggestions proposed by the management of police inspectorates. On the same lines, Promo-LEX warns about the risk of not reaching the performance indicator set for 2020 - on reducing the police response time to 15 minutes. We note that all patrolling-reactionary teams should be granted similar material intervention powers as well as similar responsibility in cases reported by citizens, even if mixed teams were formed and employees of the National Patrol Inspectorate received training in this respect. Otherwise, the reduction of the response time will not ensure achievement of the objective on "Creating a modern police service in compliance with the best international standards and practices of the European Union, able to respond proactively and equally to the needs of the citizens and the society as a whole".*

On providing equipment to employees of patrolling and operative reactionary services

Regarding the appropriate endowment of the employees of the patrolling and operative reactionary services (with transport units and special equipment purchased for employees, including TETRA radio terminals), the majority of respondents - 28 people (75%) from the management of police inspectorates stated that they are properly equipped, 8 (21%) - replied in the negative, and one mentioned that he/she does not know anything about it.

Regarding the endowment needs, 8 of the respondents stated that they do not have endowment requests for the employees of the patrolling and operative reactionary services, they being provided with the necessary equipment, other 9 respondents declared that the employees have the most modern equipment, except the TETRA equipment. At the same time, the other respondents mentioned the following endowment needs:

- ✓ Tetra equipment, including portable radio stations (7);
- ✓ Body camera/ video equipment including in the car (7);
- ✓ Tear spray⁷⁵ (4);
- ✓ Endowing the service vehicles with the necessary equipment for ensuring access to information systems for verifying personal data (4);
- ✓ Multifunctional belts, body armour, taser (3);
- ✓ Handcuffs (2);
- ✓ Batons, flashlights, computer hardware; speedometer; drone;
- ✓ New acquisition of patrol cars;
- ✓ New work uniforms - reducing the term of wear of police uniforms (at the moment being of 2 years), improvement of quality of the fabrics for uniforms (3).

Additionally, at least two respondents noted the need to conduct training courses on the correct use of all special equipments.

Promo-LEX appreciates the efforts to properly equip the patrolling and operative reactionary teams, and recommends conducting the necessary training courses in order to ensure proper use of the equipment provided, with due respect for human rights.

⁷⁵ One respondent noted that its validity period has largely expired.

On the optimisation of on-call services of operational coordination units

According to the report for the implementation of the budget support, in 2019, the on-call services of the operational coordination units within the police inspectorates were optimized, as a result of which 60 positions were assigned to strengthen the Patrol Services at territorial level. Also, the Model Regulations on the organization and functioning of the on-call services within the subdivisions of the Police has been approved by the GIP Order no. 454 of 25.11.2019 establishing the mission, areas of competence, functions and rights of the service, as well as the organization of its work. Subsequently by the GIP Order no. 500 of 24.12.2019 the standard operational procedure on the actions of the staff of the on-call service in the event of the receipt of information about crimes and contraventions was approved, the purpose of which is to standardize the way of intervention of the employee of the on-call service in the process of processing data and information about crimes and contraventions.

Thus, during the interviews, when asked whether **the optimization of the on-call services of the operational coordination units** within the PI, and assignment of positions with a view to strengthening the Patrol Services at territorial level, has a beneficial effect, 32 of the interviewees (78%) answered in the negative, 8 (19.5%) – answered in the positive, 1 (2.43%) stated that he/she does not know anything about it.

Among those who responded positively to the question on the need for this optimization, respondents stated that it was necessary, because many of the responsibilities were doubled, so these duplications were excluded, increasing the speed of reaction and the police became more present in the territory.

On the same lines, among those who answered negatively to the question on the need for this optimization, most respondents stated that optimization does not have a beneficial effect, is not necessary, is inappropriate or inefficient, and the main concern is the security of the headquarters of the police inspectorate and of the person on duty, especially in the night shift, taking into account that the weapons are kept in the headquarters of the PI. Also, some respondents believe that the on-call service should be distinct and lucrative 24 hours/ 7 days a week.

At the same time, some respondents noted that patrolling teams had been improved and strengthened and some duplications of competence had been excluded. They noted that optimization was necessary, but the staff is not properly instructed/ trained.

In this respect, Promo-LEX notes a lack of internal communication of the reorganisation measures taking place, the need thereof, the steps after the reorganisation and the expected effects of these reorganisations. We believe that a reorganisation cannot be effective if the parties directly involved in its implementation, at least, do not realise or recognise the need, opportunity and/or impact thereof, and at most have not been consulted in this regard.

On the organizational structure of regional dispatching centres and infrastructure thereof

Following the visits and interviews carried out with the persons designated within the Northern, Central, Chisinau and Southern Dispatching Centres, we note that their structure is uneven, caused by the omission of the creation of the GIP's Mission Coordination Center. If the Central and Chisinau Dispatching Centres are part of Chisinau Police Directorate, these being managed by a single person, then the Northern and Southern Dispatching Centres are structures subordinated to Balti Police Inspectorate and Cahul Police Inspectorate respectively.

When asked during interviews with representatives of the Northern and Southern Dispatching Centres, regarding the need for a reorganization thereof so that they could be no longer part of the police inspectorates, one respondent stated that it would be beneficial to separate the dispatching centre from the PI, in order to ensure the independence of decision-making. The second interviewee declared that he/she does not consider it necessary to reorganize the dispatching centre.

Table no. 18. Regional Dispatching Centres

Regional Dispatching Centre	Administrative-territorial units served by the Regional Dispatching Centre	Number of population served ⁷⁶	Number of staff of the dispatching centre according to staffing table	Number of population in relation to the number of operators in each shift
Central Regional Dispatching Centre (Chisinau PD)	Criuleni, Dubasari, Orhei, Ialoveni, Anenii Noi, Causeni, Stefan-Voda, Bender, Hincesti, Ungheni, Nisporeni, Calarasi, Telenesti, Rezina, Soldanesti, Strasenii, Cimislia, Basarabeasca	1 390 686 ⁷⁷	24 (6 * 4 shifts)	231 781
Chisinau mun. (Chisinau PD)	Chisinau municipality	847 661	20 (5* 4 shifts)	169 532.2
Northern (Balti PI)	Balti, Falesti, Glodeni, Donduseni, Briceni, Ocnita, Edinet, Soroca, Singerei, Riscani, Drochia, Floresti	984 112	20 (5*4 shifts)	195 822.4
Southern (Cahul PI)	Comrat, Ceadir-Lunga, Cahul, Leova, Taraclia, Cantemir, Vulcanesti	469 307	12 (3* 4 shifts)	156 435.6
		Total: 3 691 766		

We note that regional dispatching centres serve the administrative-territorial units under the Concept regarding the functioning of the Emergency Call Handling Integrated System, approved by the GIP Order no. 351 of 24.11.2017. However, it seems that the number of population served by the personnel of the dispatching centre varies from 156 435 to 231 781.

The Promo-LEX Association considers that the structure of regional dispatching centres must be uniform, while the number of operators must be proportional to the number of population served.

We note that according to the data obtained in the interview, to the situation at 31.12.2019, 4 vacant positions existed in each of the Central, Chisinau mun., Northern dispatching centres, and one vacant position in the Southern dispatching centre.

When asked if repair works of the premises where employees of the dispatching centre perform their work have been carried out, all interviewees answered in the affirmative, although there was mentioned the need to replace the chairs in Balti dispatching centre, previously cosmetic repairs being carried out therein.

Also, according to the respondents, the Automated Information System of the MIA for the GPS-based monitoring of the car fleet belonging to MIA subdivisions is installed on the operators' computers and each operator can see on the map the available crews and the closest crew to the scene of the incident, the intervention of the primary reactionary teams taking place according to the principle "the closest police team". However, one interviewee noted that some territorial subdivisions react with difficulty due to lack of staff, including problems with GPS systems in police inspectorates.

As for the availability of working spaces for each employee, all interviewees stated that all the conditions required for the performance of their duties are ensured within the dispatching centre,

⁷⁶ According to the statistical data from the State Register of Population on individuals residing in the Republic of Moldova in administrative-territorial profile (as of 1st of December 2019), published by the Public Services Agency.

⁷⁷ Population of Bender municipality was not taken into account.

and for making the services of the dispatching centres more efficient, qualitative training would be needed, including in the field of intervention.

Promo-LEX considers that the infrastructure of the police dispatching centres largely corresponds to their needs, however it recommends examining the possibility of reorganizing the regional dispatching centres, especially the Northern and Southern ones by excluding them from the organizational chart of Balti and Sourthern Police Inspectorates.

On the approval/changes made to job descriptions, training and assessment of persons employed with dispatching centres

With regard to the question whether the job descriptions of the staff in the regional dispatching centres were changed after 18.06.2018, the date when the GIP Order no. 278 on the approval of the framework Regulation on the organization and functioning of the dispatching centre within the Police territorial subdivision and model job descriptions of the employees thereof have been issued, 3 interviewees answered in the affirmative, one of whom specified that the latter have been approved on 7th of February 2020. At the same time, one person replied that no changes have been made to the job descriptions thereof.

On the same lines, to the question relating to the number of employees who have received training on the use of the 112 AIS, respondents indicated the total number of staff, to the situation at 31.12.2019, or 88% of the total number of employees in the regional dispatching centres. We note that according to the report for the implementation of the budget support, during 2019, 56% of Police dispatchers received training on the use of 112 AIS.

According to the answers, all the interviewees declared that the assessment of dispatchers takes place periodically. However, on the additional question about the date of the last assessment, the Promo-LEX monitors received different answers; in two cases it was mentioned that the psychological state is assessed and after each shift the way of receiving and managing phone calls is evaluated, in one case it was mentioned that all assessments take place in October of each year, and in another case it was mentioned that the assessment is carried out twice a year (in June and October).

Promo-LEX recommends carrying out the necessary actions in order to provide all operators within the regional dispatching centres with training, assessing them periodically and developing procedures as specific as possible with a view to responding to citizens' emergency calls.

OBJECTIVE 5: Promoting and implementing the principle of zero tolerance for corruption, discrimination and ill-treatment in the activity of the Police.

Objective 5 has been developed with the purpose of promoting and ensuring transparency of the activity and professional integrity of the Police. It contains 2 actions and 8 sub-actions. Five sub-actions out of 8 have a continuous term, in respect of which the Promo-LEX Association proposed some recommendations. Hence, the degree of achievement of the objective hereof remained the same. Of these, two sub-actions were qualified as partially fulfilled, while one sub-action as fulfilled.

The sub-actions 5.1.3 - Development of the electronic system of the fact-finding and recorded traffic offences in order to reduce human intervention in this activity and 5.1.4 - Reorganization of public procurements system within the Police and training the staff in charge - present a considerable risk of non-implementation thereof.

As for the indicators set by the Policy Matrix for the action A.5.1. for 2019, Promo-LEX found that the criteria have been achieved.

Based on the Police Development Strategy

- 5.1. Promoting and implementing the principle of zero tolerance in the activity of the Police.**
- 5.1.2 Intensifying prevention campaigns of corruptive behavior of policemen, particularly in the vulnerable areas.**

Performance Indicators: prevention campaigns conducted therein

Timescale for completion: 2017–2020

According to the progress report on the implementation of the PDS, 2 information and awareness campaigns were launched and carried out in 2019, namely:

- ✓ ***The campaign “We DON’T accept the corruption in Police”*** which had a preventive and awareness nature for both police officers and citizens on the risk they face when offering or taking bribes. In this very campaign, a Facebook page was created entitled #WE_DON’T_ACCEPT_CORRUPTION_IN_POLICE, two TV programs were attended, both a video and an audio spot, with a message in Romanian and Russian languages, addressed to citizens and police employees, being urged not to offer or take bribes, as well as to report these cases to the competent authorities were launched. The audio spot was broadcast through 7 radio stations and the video spot was broadcast through several TV stations. In addition, information messages with campaign logotype were placed on led panels in Chisinau municipality; a contest for students, on the topic “I choose an upstanding future” was conducted therein; also information and awareness raising activities of citizens related to the principles of the phenomenon of corruption were carried out in 8 localities of the Republic of Moldova.
- ✓ ***The information campaign “Police officers of good repute and integrity – protected citizens”***, carried out by the GIP jointly with the National Anticorruption Center, aimed at preventing cases of corruption and abuses within the police. During this campaign, 38 training sessions were held on the topic “Rules of integrity in all territorial subdivisions of the police”, attended by around 2500 employees.

We note that in relation to the request for information submitted to territorial subdivisions of the police on the conduct or non-conduct of a local campaign aimed at preventing the corrupt behavior of police officers in 2019, according to the replies provided therein, such campaigns have been conducted in three police inspectorates (Anenii Noi PI, Cahul PI and Cantemir PI); also gatherings aimed at informing, preventing and non-admittance of corrupt behaviour were

organized in Vulcanesti PI during which 67 persons have been informed in respect thereof. At the same time, in at least eight police inspectorates, during the operational sessions/training hours, information sessions were held to prevent corruption cases.

The Promo-LEX Association appreciates the efforts regarding the national campaigns carried out, however, according to the activity formulated, campaigns to prevent criminal behavior must be intensified, especially in vulnerable areas. In this regard, the expectations also concern an increase in the number and frequency of campaigns to prevent corruptive behavior of policemen however the campaigns aimed at preventing corrupt behavior can also be carried out locally, following the model of campaigns on community policing. In addition, we draw attention to the need for the campaign, especially in vulnerable areas.

5.1.3 Development of the electronic system of the fact-finding and recorded traffic offences in order to reduce human intervention in this activity.

Performance Indicators: regulatory framework adjusted therein, electronic system developed therein

Timescale for completion: 2018–2020

Automation of the process for detecting and finding violations in the field of road traffic committed by the drivers, accumulating evidence for solving the case and bringing them to contravention or criminal liability, collecting data on the road situation in the real-time surveillance zones is the goal pursued by the automated road traffic control and monitoring system established under the Government Decision no. 965 of 17.11.2014 (Road Traffic Control Concept).

By the Government Decision no. 1264 of 19.12.2018, entered into force on 25.01.2019, changes have been made to the Government Decision no. 965 of 17.11.2018, granting same powers to both the private and the public partner, including the right of access to information from the System. We highlight, in this respect, that in its audit report, the Audit Chamber⁷⁸, stated as follows: *“signature of contracts with **economic operators** was performed without taking into account **that the latter are not entitled to participate in the ATMS**, because they are neither entrusted by the applicable law to conduct any activities related to monitoring and ensuring the safety of road traffic **nor entitled to carry out any tasks of public interest or which may result out of the exercise of the prerogatives of public authority**”.*

On 8th of February 2019, the MIA initiated the public consultation of the draft Government decision on approving the objectives, conditions of public-private partnership for the implementation of the Automated Road Traffic Monitoring System (ATMS) in the Republic of Moldova and general requirements for private partner selection.⁷⁹ According to the information note, the implementation of the public-private partnership project presupposed the transfer to a private investor of the rights and obligations related to the implementation and technical operation of the ATMS in the Republic of Moldova, who will make investments from own sources within 6 years from signing the contract. The feasibility of the partnership is revealed by the Feasibility Study, which starting from the total volume of investments of about EUR 21 million, to be attracted for the implementation of the partnership, indicates that the optimal period of return on investment is 25 years.

The project was approved by Government Decision no. 82 of 11.02.2019, in violation of the norms of decisional transparency. By this decision, both the objectives and the conditions of the public-private partnership on the creation of the Automated Public Safety and Traffic Surveillance Control System (APSTSCS) were approved, the MIA was designated as the public authority

⁷⁸ Approved by the Decision no. 12 of 05.04.2017. Available at: <https://bit.ly/2NfaQma>

⁷⁹ <https://bit.ly/33Uqzgx>

responsible for conducting the private partnership selection procedure, through public competition conducted in a single stage and the creation of APSTSCS was included in the list of state-owned goods and the list of works and services of national public interest proposed to the public-private partnership.⁸⁰

Subsequently, on 29.03.2019, the Public Property Agency published the informative press release regarding the announcement made by the MIA about the public tender for the selection of the private partner for the implementation of the project, the deadline for opening the bids being 30.05.2019.⁸¹ We note that although a private partner was selected, the signing of the contract did not take place.

On 2.12.2019 the MIA initiated the public consultation of the draft government decision on the approval of the draft law on the automated information system for recording contraventions, contravention cases and persons who committed them.⁸² According to the information note, by approving this draft law, it will be ensured the development of an unique information resource for recording contraventions, contravention cases and persons who have committed them, which will be available to all authorities and bodies with specific responsibilities for the contravention process with the possibility of entering/extracting information in/from the system in real time, so that everyone can duly and timely perform their legal duties in the field of finding and examining contraventions. We note that, until the end of 2019, the draft government decision thereof was not placed on the executive's agenda.

On the same lines, on the 24th of October 2019, by the Decision 56/2019, the Court of Accounts approved the Report of the follow-up mission on the implementation of the requirements and recommendations approved by the CoA Decision no. 12/2017 on the approval of the audit report „Management of road traffic surveillance systems”⁸³. Hence, the MIA, is to implement in advance the recommendations of the Court of Accounts, namely to review the existing legal framework⁸⁴, ensuring the interconnection of legal provisions, as well as connecting the Chinese software to the requirements of the national legislation on its integration in the RFCI AIS, as well as to implement the Policy on the Protection of Personal Data for all information systems owned, and also to bring the contravention procedure initiated on the basis of information obtained via the Automated Road Traffic Monitoring System „Traffic Surveillance Control” into conformity as regards the provisions of the Contravention Code, ensuring its completion through electronic minutes.

Considering the aforementioned, we recommend the implementing institutions identifying optimal solutions for the development of the electronic system for finding and recording road traffic contraventions, in compliance with the recommendations of the Audit Chamber and the rules on decision-making transparency, particularly in the case of public-private partnership and, where appropriate, conducting an ex-ante analysis of the process of monitoring the road traffic via the Road Traffic Control System.

⁸⁰ <https://bit.ly/3dGDZBI>

⁸¹ <https://bit.ly/3athcqQ>

⁸² <https://bit.ly/2UsT4Pm>

⁸³ Decision 56/2019 on the approval of the Report of the follow-up mission on the implementation of the requirements and recommendations approved by the CoA Decision no. 12/2017 on the approval of the audit report „Management of road traffic surveillance systems”, available at: <https://bit.ly/3dl4SKc>

⁸⁴ Rules of operation of the RFCI AIS, ARTMS “Traffic Surveillance Control” and AIS REC

5.1.4 Reorganization of public procurements system within the Police and training the staff in charge

Performance Indicators: system adjusted therein, procurement system regionalized therein, operational procedures developed and approved therein, staff instructed

Timescale for completion: 2017–2020

According to the progress report for the implementation of the PDS, in 2019, the GIP has conducted 239 procurement procedures via the MTender system. Also, the report referred to the participation within the round table entitled “An efficient system for the settlement of disputes is the key to an effective system of public procurement”, organized by the Institute for Development and Social Initiatives (IDIS) “Viitorul”.

According to the GIP response of 26th of March 2020 to the request for information submitted by Promo-LEX, during 2019, **no operational procedures in the field of public procurement have been developed**, the legal, regulatory and departmental framework in force being applied within the institution.

When asked about conducting public procurement for the needs of Police Directorates of Chisinau municipality and ATUG, the GIP informed that **it has announced procurement procedures for the regional subdivisions of the police**, as follows:

- ✓ for the needs of the PD of ATUG – reconstruction of the police station no. 3 under Ceadar-Lunga PI, police station no. 2 under Comrat PI, police stations no. 1 and no. 2 under Vulcanesti PI has been performed; computers were purchased for the renovated police stations; metal detectors were purchased for provisional detention isolators; goods were purchased for the full operationalization of police stations;
- ✓ for the needs of the PD of Chisinau municipality - transport units were purchased for the documentation of road accidents; computers were purchased for the renovated police stations; metal detectors were purchased for provisional detention isolators.

On the same lines, according to the GIP, during 2019, the police directorate concluded 71 contracts amounting to 15.161,7 thousand lei to cover the needs of the police inspectorates subordinate to Chisinau PD (Botanica PI, Buiucani PI, Centru PI, Ciocana PI, Rascani PI), and 41 contracts amounting to 2.437,6 thousand lei to cover the needs of the police inspectorates subordinate to the ATUG PD (Ceadir-Lunga, Comrat and Vulcanesti PIs).

The GIP also informed that during 2019 **no centralized trainings in the field of public procurement were conducted**, some leaders or representatives of the territorial subdivisions participating in the training sessions organized by non-governmental organizations.

In the light of the foregoing, Promo-LEX concludes that in 2019 some efforts have been made to achieve the performance indicators established under the sub-action 5.1.4. At the same time, we note that both initiation and conduct of public procurements under a regionalized system by police directorates must be ensured, including by publishing the procurement plans and reports on the performance of public procurement contracts on the website. It should be noted that the delay in the regionalization of the police sector as well as in establishing the three regional directorates leads to the delay in the implementation of the sub-action 5.1.4.

In addition, we note that according to the 2019 Performance Report of the National Agency for Solving Complaints⁸⁵, the General Inspectorate of Police is one of the contracting authorities against which most claims were submitted regarding public procurement procedures initiated / carried out (more of 8 appeals), ranking fourth after the Center for Centralized Health

⁸⁵See page 30 available at <https://bit.ly/33qlQTP>

Procurement, “Nicolae Testemitanu” State University of Medicine and Pharmacy and Directorate General of Public Services and Utilities.

Promo-LEX asked questions about the conduct of public procurements both during interviews with the management of police inspectorates and in its request for information addressed to them, the results of the observations being the following:

- ✓ 31 (91.1%) of the respondents stated that in 2019 public procurements have been conducted, while 3 (8.82%) stated that no public procurements have been conducted by them⁸⁶. On the same lines, persons employed with 12 PIs (38.7%) of 31 conducting public procurements did not receive any training in the field of public procurements, whilst in the case of 19 PIs (61.29%) – the persons in charge of public procurements received training in this field;
- ✓ in an interview, it was mentioned that in the event of a bid, due to lack of people competent in this field, the PI management had to call on the specialists of the district council to help them organize and conduct it correctly.
- ✓ according to the replies provided in respect to the point of order submitted to territorial subdivisions of the police, seven police inspectorates have an annual procurement plan, while at least 10 – do not have such a plan⁸⁷. It should be noted that the police directorates have an annual procurement plan as well as a report on low value public procurement contracts already developed. On the same lines, of 21 police inspectorates, 13 - have prepared the report on low value public procurement contracts.
- ✓ Based on the feedback we received, at least seven police inspectorates launched public procurement procedures in 2019 (these were: Falesti PI, Nisporeni PI, Ungheni PI, Edinet PI, Leova PI, Taraclia PI, Rezina PI.)

In light of the foregoing, Promo-LEX sees the need to conduct both training courses for the staff of GIP subdivisions in the field of public procurements and develop standard operating procedures in the field thereof. These activities would facilitate the organisation of public procurement, reduce the volume of centrally organised public procurement, and ensure uniform and consistent application of legislation. Hence, we repeat our recommendation to the General Inspectorate of Police to develop and approve standard operating procedures, provide training for the staff involved in the public procurement procedure within the GIP subdivisions and make all reasonable efforts to regionalise the Police and public procurements respectively.

We also draw attention to the fact that the police’s territorial subdivisions do not have a website, which makes it impossible to comply with the provisions of section 18 of the Regulation on the planning of public procurement contracts, approved by Government Decision No. 1419 of 28th of December 2016, i.e. the publication of the provisional/annual procurement plan. We therefore recommend identifying a temporary solution to ensure compliance with legal provisions until the operation of Police in a regionalized system.

⁸⁶ Police Inspectorates subordinated to Chisinau PD and ATUG PD do not carry out any public procurements; the corresponding Police Directorates being responsible for the procurement needs thereof.

⁸⁷ Only 25 police inspectorates responded to the request for information submitted by Promo-LEX. Not all of them provided responses to the questions on public procurement plans and reports on low value public procurement contracts.

5.2 Improving the cooperation between agencies and structures of combating corruption at intra and inter-institutional level.

5.2.3. Achievement jointly with Internal Protection and Anti-Corruption Service of the Ministry of Internal Affairs and National Anticorruption Centre of some training programs for police staff in preventing corruption.

Performance Indicators: trainings conducted therein

Timescale for completion: 2017–2020

According to the progress report on the implementation of the PDS, during 2019, the employees of the Anti-Corruption Prevention and Studies Division of the Internal Protection and Anti-Corruption Service of the MIA have participated in a working group having the responsibility to develop the JLETC curriculum for the initiation of the training course in the field of anti-corruption ethics and measures thereof, preparing also the programme of the training course related to the Anti-Corruption Chapter.

In addition more than 262 training courses (sessions/workshops/lectures) have been conducted during the reference period, which were attended by more than 6298 employees. We note that compared to the number of employees within the GIP to the situation at 31.12.2019 (7406), only in 2019, 85% of the staff received training in the field of integrity and combating acts of corruption.

The training courses thereof focused on topics such as ethics, professional integrity, institutional integrity, whistleblowers, preventing and combating corruption, the use of special methods and techniques for investigating corruption cases, the procedure for declaring the assets and personal interests, etc.

*Promo-LEX reiterates that both organization and participation of GIP employees in various trainings and workshops aimed at preventing corruption and ensuring professional and institutional integrity is welcomed. However we believe that such trainings should be continuous, accompanied by a clear message so as to ensure a common perception and understanding of the phenomenon thereof. Thus, we advise the implementing institutions continuing its efforts in developing **certain training programs for the police staff**, implementation thereof, which will also evaluate the capabilities of the staff attending training in the corruption prevention area.*

5.2.4. Establishment and development of verification of complaints system against police personnel on discrimination and ill treatment acts in Police activity.

Performance Indicators: training sessions conducted therein; standard operating procedures developed and approved therein

Timescale for completion: 2017–2020

According to the progress report for the implementation of the PDS, three training courses have been conducted during 2019:

- training course for employees involved in the activity of provisional detention;
- training course on “Legal protection of human rights”, organized within the Academy “Stefan cel Mare” of the MIA, attended by 19 employees (women-1, men-18) within the Detention and Escort Services of the GIP subdivisions.
- training course on “Legal protection of human rights”, organized within the professional development division of the Academy “Stefan cel Mare” of the MIA.

We note that according to the GIP response of 26th of March 2020 to the request for information submitted by Promo-LEX on the number of service investigations initiated and conducted in 2019,

193 service investigations have been initiated and conducted therein involving **243 employees**, of which 29 investigations resulted in issuing disciplinary sanctions orders in respect of 38 employees. (see Table no. 19 below).

Table no. 19. Disciplinary sanctions applied to GIP employees in 2019

Name of the institution conducting the service investigation	Sanction applied	Number of employees	The structures to which the employees belong
The GIP Staff Inspection Division	warning	19	NPI, NII, Ungheni PI, Straseni PI, Singerei PI, Soldanesti PI, Battalion for Patrolling and Operational Reaction (BPOR) of Chisinau mun. PD, Botanica PI of Chisinau mun. PD, Centru PI of Chisinau mun. PD, Taraclia PI, Bender PI, Ialoveni PI.
	reprimand	9	Anenii Noi PI, NPI, NII, Glodeni PI, Falesti PI, Buiucani PI of Chisinau mun. PD;
	severe reprimand	4	Criuleni PI, Orhei PI, Ciocana PI of Chisinau PD
	classification in a special function group with downgrading	1	Ialoveni PI
	downgrading	1	Botanica PI of Chisinau mun. PD
	dismissal from the position of civil servant with special status	4	NPI, Buiucani PI of Chisinau mun. PD, Dubasari PI, Ciocana PI of Chisinau PD
Internal Protection and Anti-Corruption Service of the Ministry of Internal Affairs	warning	2	Chisinau mun. PD
	reprimand	2	Criuleni PI, Buiucani PI
	severe reprimand	1	Dubasari PI
	dismissal	6	Riscani PI, Leova PI, NII, NPI
	downgrading	2	CC of the GIP
Total:		51	24 GIP structures

Also it was proposed to reduce the premium for monthly performance of 70 employees up to 10% of the annual amount of basic salaries at the level of the budget unit, whilst 134 employees have been warned only.

On the same lines, pursuant to section 26 of the standard operating procedure “Initiation and conduct of service investigations”,⁸⁸ in the case where the service investigation is initiated for disciplinary proceedings on **acts of corruption, related to corruption, acts of corruptive behavior, acts of torture, inhuman or degrading treatment, and other misconduct** likely to endanger the safety of the MIA, administrative authorities and institutions subordinated to the MIA, in the framework of their respective competences, shall submit the latter within 24 hours to the Internal Protection and Anti-Corruption Service (IPACS) of the MIA, including obligatory

⁸⁸ Approved by the GIP Order no. 407/ 2018

notification of the management of the Staff Inspection Division about it. Thus, in 2019, **9 cases** for conducting service investigations have been submitted to the IPACS of the MIA.

According to the 2019 Activity Report of the Internal Protection and Anti-Corruption Service⁸⁹, during 2019, disciplinary sanctions have been applied in respect of 13 persons employed with the GIP (see Table no. 19) by the IPACS, while in relation to criminal investigation, on the cases investigated by IPACS employees 91 GIP employees were or are still being documented.

We note that during 2019, several complaints against the actions of the Ministry of Internal Affairs and GIP subdivisions were examined by the Council for the prevention and elimination of discrimination and ensuring equality. As regards four complaints, the Council found:

- ✓ 1 case of incitement to discrimination on grounds of belief⁹⁰;
- ✓ 1 case of discrimination in relation to gender and age under equal protection by law⁹¹;
- ✓ 1 case of victimisation⁹²;
- ✓ 1 case of discrimination based on language in the exercise of the right to receive a reply in the language of the request⁹³.

According to the implementing institutions, developing own mechanisms for checking the complaints against the police staff regarding acts of discrimination and ill-treatment in the Police sector, is contrary to the provisions of the normative acts in force, namely:

- the Joint Order of the Attorney General, Minister of Justice, Minister of Internal Affairs, the NAC director, director general of the Customs Service and Minister for Health of 31st of December 2013 on the procedure for identifying, recording and reporting the alleged cases of torture, inhuman or degrading treatment. It provides for the reception, recording and transmission to the territorial or specialized prosecutor's Office of complaints, statements or other information about alleged acts of torture, inhuman or degrading treatment;
- Law no. 121/2012 on ensuring equality. Thus, the applications covering forms of discrimination, are being referred to the Council for Preventing and Eliminating Discrimination for examination.

Promo-LEX Association reiterates that although in 2018 by the GIP Order no. 407, the standard operating procedure "Initiation and conduct of service investigations" has been approved, it practically does not cover the acts of discrimination and ill-treatment. For this reason, in order to achieve the indicator set therein, Promo-LEX further recommends to the Ministry of Internal Affairs, which is the subject in charge for implementing the activity thereof to develop the standard operating procedure verifying the complaints lodged against the Police staff on discrimination and ill treatment acts, or make corresponding amendments to the Action Plan for the implementation of the PDS.

⁸⁹ <https://bit.ly/3by1gn2>

⁹⁰ <https://bit.ly/2lqeoif>

⁹¹ <https://bit.ly/2UTBgMy>

⁹² <https://bit.ly/39t9LP8>

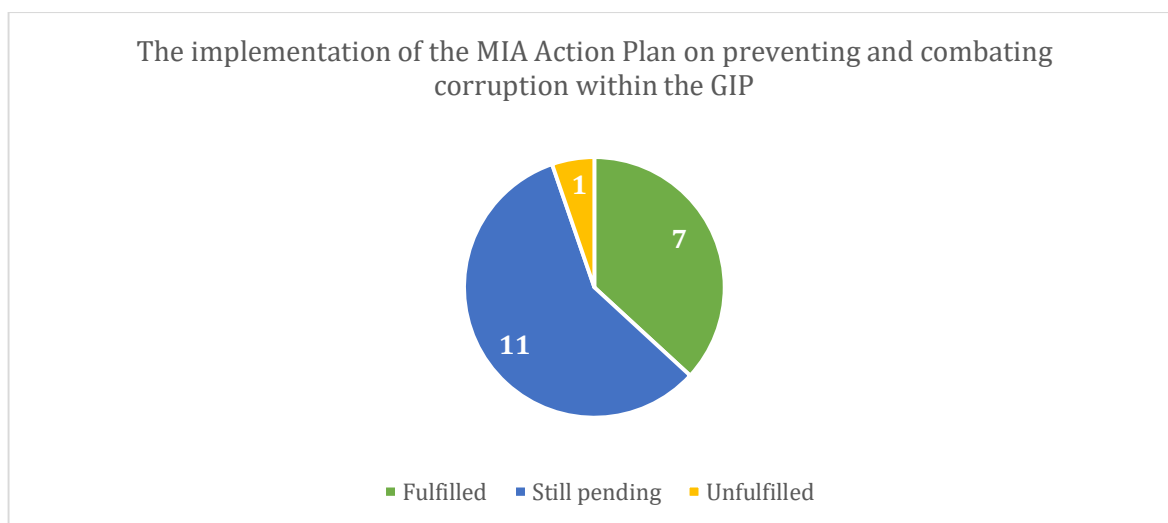
⁹³ <https://bit.ly/2ylk3nv>

A.5.1. Strengthening the capacity to prevent and combat corrupt behaviour within the police forces, in particular by targeting internal anti-corruption capacities while improving motivation.

2019 Indicator: the Action Plan is implemented in accordance with the indicators set therein; both initial and ongoing training on anti-corruption ethics and measures are carried out by the JLETC for a minimum of 250 participants).

The progress report on the implementation in 2019 of the MIA Action Plan on preventing and combating corruption within the GIP⁹⁴ has been published on politia.md website.

Chart no. 23. *The implementation of the MIA Action Plan on preventing and combating corruption within the GIP, according to the progress report developed by the GIP*



Among the main achievements of 2019 reflected, including, in the Progress Report, we list the following:

- ✓ launching and conducting two information and awareness campaigns⁹⁵
- ✓ developing the Report on the results of the self-assessment of corruption risks within the Human Resources Directorate of the GPI;
- ✓ developing and publishing the Report on the results of the corruption risk assessment carried out within the National Investigation Inspectorate and the territorial investigation bodies⁹⁶,
- ✓ developing the Research Report on the interpretation of the results of the operation of the Anonymous Questionnaire for evaluating the perception of corruption in the fields of activity of the Police,
- ✓ conducting training sessions and courses in the field of corruption prevention, including within 38 territorial subdivisions,
- ✓ instructing 4 trainers in the field of staff training on professional ethics and integrity;
- ✓ approving the standard operational procedure for integrity warnings and designating the subdivision responsible for recording cases of disclosure of illegal domestic practices and integrity warnings;

⁹⁴ <https://bit.ly/3bvhnSq>

⁹⁵ See pages 59-60

⁹⁶ <https://bit.ly/3apcydi>

- ✓ approving the Corruption Risk Assessment Methodology within the Ministry of Internal Affairs.

Referring to the performance indicator - *initial and ongoing training on anti-corruption ethics and measures carried out by the JLETC for a minimum of 250 participants*, we note that according to the MIA Order no. 308 of 23rd May 2019, JLETC conducted 5 training courses in the field of integrity, which were attended by 120 Police employees holding both administrative and managerial positions. Five-day courses (a total of 150 hours) were held, which addressed topics on integrity and measures to ensure it, testing professional integrity and whistleblowers, manifestations of corruption, improper influence, the code of ethics and deontology and service discipline. According to the report submitted by the IPACS, regarding the enforcement of the MIA Order no. 308 of 23rd May 2019, during the training courses conducted therein, the staff noted the risks that contribute to the commission of crimes of corruption, namely the low salary that does not allow them to support their family and make additional expenses at work, to ensure the conduct of service activities, as well as to cover expenses for food, travel and other actions/activities required.

On the same lines, according to the progress report for the implementation of the MIA action plan on preventing and combating corruption within the GIP, in addition, in 2019, 4 training courses were conducted during September-October. So, during 2019, 248 employees in the GIP subdivisions, holding both administrative and managerial positions received training, the course thereof ending with the assessment of participants and granting of certificates.

In addition, 56 non-commissioned officers attended the training in the field of Police Ethics and Integrity within the initial training course, thus the total number of persons receiving training being **304 employees**.

*Thus, the Promo-LEX Association finds that the performance criteria set therein **were fulfilled**, the performance indicator on training courses in the field of anti-corruption ethics and measures being largely achieved, being instructed by two persons less than the figure determined by the Policy Matrix, while the Action Plan on preventing and combating corruption being implemented under the indicators set.*

Referring to the number of corruption cases, we note that according to the NAC Activity Report⁹⁷, during 2019, the most frequent corruption cases were found in the Ministry of Internal Affairs (56 cases), for committing corruption and corruption-related crimes, the Center identifying and criminally investigating 45 police inspectors. For comparison, in 2018, the NAC found 54 cases for committing corruption and corruption-related crimes in the Ministry of Internal Affairs, 29 police inspectors being investigated. Thus, we find that in 2019 both the number of investigated corruption cases and the number of investigated police inspectors increased.

However, according to the Annual regular analytical report on misconduct committed by police staff members on the territory of the Republic of Moldova between 2016 and 2019⁹⁸, the share of criminal cases (under art. 324, 326, 327, 328, 329, 330, 332 of the Criminal Code) has been steadily decreasing, thus compared to 2018 (61/78), in 2019 we see a decrease by -17 cases. More often, employees of the NPI, Chisinau PD, NII, Centru PI, Botanica PI were involved in such acts, the latter holding for the most part offices such as: patrol officer, investigation officer and district officer.

Referring to the indicator set for 2020, according to the GIP answer no. 34/57 -844 of 26th March 2020, to the request for information submitted by Promo-LEX, to the situation at 31st December 2019, the lowest is **3.390,00 lei** and relates to the administrative position of non-commissioned officer in the subdivisions subordinated to administrative authorities. According to the National

⁹⁷ <https://bit.ly/2UR0KtX>

⁹⁸ The annual regular analytical report on misconduct committed by police staff members on the territory of the Republic of Moldova between 2016 and 2019, available at: <https://bit.ly/3b908Uw>

Bureau of Statistics of the RM, the value of the minimum income in **the 1st semester of 2019** per individual, in the country was 2028,3 lei⁹⁹. Thus, the amount of the lowest basic salary in 2019 within the General Inspectorate of Police corresponds in proportion of 167% to the minimum consumption basket established by the National Bureau of Statistics. We note that compared to the European average, the salaries of police officers in the Republic of Moldova are still very low.¹⁰⁰

In conclusion, the Promo-LEX Association welcomes the efforts made by the implementing institutions to achieve the indicators set by the Policy Matrix, but also the efforts made by the Internal Protection and Anti-Corruption Service of the MIA and competent bodies investigating the acts of corruption, with a view to combating the corruptive behavior in the police forces. However, we recommend to both the Government and the Ministry of Internal Affairs to take the necessary actions to increase the salary of police employees, not only in relation to the minimum consumption basket, but in relation to the average salary in the economy, as conducting trainings for and sanctioning of employees are not sufficient measures to combat corruption in police forces.

⁹⁹ <https://bit.ly/33VhVOY>

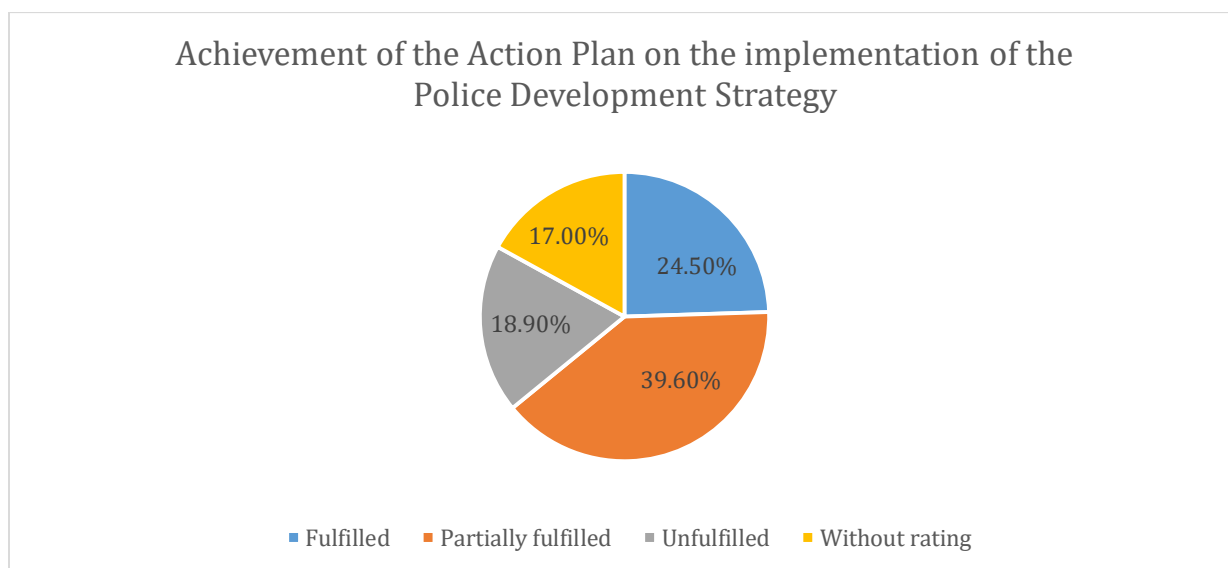
¹⁰⁰ <https://bit.ly/39Tu7RD>

GENERAL CONCLUSIONS

Out of the total number of activities planned, 53 sub-actions (63%) were to be implemented by the end of 2019. Referring to the degree of their fulfilment, the Promo-LEX Association gave the following ratings:

- ✓ **13 sub-actions – fulfilled (24,5%)**
- ✓ **21 sub-actions – partially fulfilled (39,6%);**
- ✓ **10 sub-actions – unfulfilled (18,9%)**
- ✓ **9 sub-actions (17 %) have too general formulations, while their indicators are not measurable. Therefore, the Promo-LEX Association could not comment on the degree of their fulfilment.**

***Chart no. 24.** Achievement of the Action Plan on the implementation of the 2016-2020 Police Development Strategy*



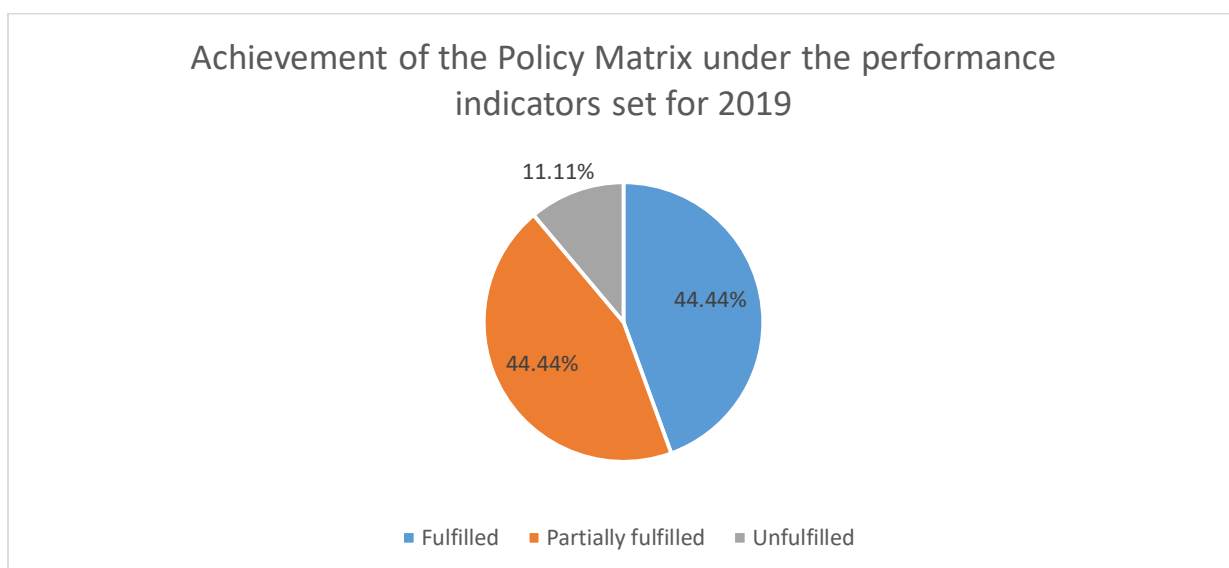
The Promo-LEX Association concludes that out of 8 sub-actions that were to be fulfilled in 2019, two were qualified as partially fulfilled, one sub-action was qualified as unfulfilled, while in the case of the other five sub-actions, Promo-LEX could not assign any rating in respect of their degree of fulfilment (four of them cover the purchase of the equipment).

At the same time, at least 4 sub-actions present a considerable risk of non-implementation thereof, three – related to the development of some information systems, one – related to the conduct of public procurements.

Of all performance criteria set for 2019 in the Policy Matrix in respect of 9 actions, the Promo-LEX Association qualified:

- ✓ **The indicators for one action as unfulfilled (11.1%)**
- ✓ **The indicators for four actions as fulfilled (44.4%);**
- ✓ **The indicators for four actions as partially fulfilled (44.4%)**

Chart no. 25. Achievement of actions in the Policy Matrix in accordance with the indicators set for 2019



On the same lines, at least in the case of two actions there is a considerable risk of failure to achieve the indicators set for 2020, related to the achievement of the ratio of 40% officers/60% non-commissioned officers and operationalization of the Integrated Training Center for Law Enforcement.

RECOMMENDATIONS

To the Parliament of the Republic of Moldova

1. Amending the Law no. 320/2012 on police activity and status of police officer, on the organization and functioning of Northern, Central and Southern Regional Police Directorates.
2. Increasing the salaries of Police employees.

To the Government of the Republic of Moldova

3. Cancelling the moratorium on the appointment of the staff from the budget sector to fill in the vacancies in the General Inspectorate of Police.
4. Increasing the salaries of Police employees.

To the Ministry of Internal Affairs

5. Taking the necessary actions to regionalize the Police sector.
6. Initiating the construction works for the Joint Law Enforcement Training Centre, or finding the best solutions agreed with the development partners to amend or review the conditions for the implementation of the objective A.1.3.
7. Drafting and approving the strategic documents for the development of the police sector for the next period, including only the actions and activities achievable within the expected term with expected results, measurable indicators, and concrete execution deadlines.
8. Taking the necessary actions to strengthen the Police's capacity to participate in international missions and European Union crisis management operations.
9. Identifying the best solutions to ensure both the reversal of jobs pyramid and filling of vacant posts in the General Inspectorate of Police.

To the General Inspectorate of Police

10. Carrying out, together with the MIA, the necessary actions in order to regionalize the police.
11. Deconcentrating the activities of maintaining and ensuring public order at the level of the territorial subdivisions of the Police, by providing the territorial subdivisions of the Police with both powers and staff necessary to manage the situation at the local level;
12. Standardizing the structures and status of the Regional Investigation Units.
13. Initiating, organizing and conducting public procurements in a regionalised system.
14. Examining the possibility of reorganizing the regional dispatching centres, especially the Northern and Southern Dispatching Centres by excluding them from the subordination of the Balti and Southern regional police inspectorates.
15. Supplementing the number of rapid response teams to the citizens' emergency calls according to the needs of police inspectorates.
16. Carrying out long-term crime prevention campaigns, independent of those organized together with civil society.
17. Developing the action plan on external police communication.
18. Monitoring the compliance with recruitment procedures, notably with the principle for the publication of job announcements by both territorial and specialized subdivisions of the Police.
19. Avoid reporting the same information in different activities.
20. Identifying the best solutions to ensure both the reversal of jobs pyramid and filling of vacant posts in the General Inspectorate of Police.

LIST OF ABBREVIATIONS

WMD - Weapons of Mass Destruction;
AWP – Association of Women in Police;
CPA - Community Policing Activity;
“Fulger” SPPB -Special Purpose Police Brigade;
BMA – Bureau for Migration and Asylum;
IPCC - International Police Cooperation Center;
JLETC – Joint Law Enforcement Training Centre;
NAC - National Anticorruption Center;
CPC - Criminal Procedure Code;
CPT - Council for the Prevention of Torture;
FJEC - Forensic and Judicial Expertise Centre;
GDPS - General Directorate for Public Security;
GDCP – General Directorate for Criminal Prosecution;
DIREA - Directorate of International Relations and External Assistance;
HRD - Human Resources Directorate;
CTD - Carabineer Troops Department;
GD - Government Decision;
IHRM - Institute for Human Rights of Moldova;
PDI - Provisional Detention Isolator;
GIC - General Inspectorate of Carabinieri;
GIP - General Inspectorate of Police;
ILP - Intelligence-Led Policing;
NPI - National Patrol Inspectorate;
NIPS - National Inspectorate of Public Security;
PI - Police Inspectorate;
LAN - Local Area Network;
MD - Ministry of Defense;
MIA - Ministry of Internal Affairs;
NPMT – National Preventive Mechanism against Torture;
PSDP - Police Strategic Development Program;
PDS - Police Development Strategy;
ATMS - Automated Traffic Monitoring System;
RFCIAIS – “Registry of Forensic and Criminological Information”, Automated Information System;
SRA SIA – “State Registry of Arms”, Automated Information System;
ISECM - Integrated System for Emergency Calls Management;
EMIS- Emergency Management Information System;
PD- Police Department;
SPCML - Service for Prevention and Combating Money Laundering;
CPDP – Center for Personal Data Protection;
IPACS - Internal Protection and Anti-Corruption Service of MIA;
ITS - Information Technology Service.

ANNEXES

Annex no. 1. Statistical data on employment in police inspectorates

Type of employment	Recruitment from internal sources				Recruitment from external sources			
Source	Request for information		Monitoring of the politia.md website		Request for information		Monitoring of the politia.md website	
Police Inspectorate	Number of job announcements published	Number of positions for the job announcements published	Number of job announcements published	Number of positions for the job announcements published	Number of contests organized	Number of positions for the contests organized	Number of contests organized	Number of positions for the contests organized
Anenii -Noi PI	3	3	28	13	20	20	21	16
Balti PI	63	54	56	47	13	24	26	19
Basarabeasca PI	4	4	10	10	2	2	1	1
Bender PI	11	-	42	15	7	-	5	5
Botanica PI (Chisinau)	6	7	291	58	2	2	12	7
Briceni PI*	0	0	-	-	0	0	-	-
Buiucani PI (Chisinau)	1	2	432	60	6	7	29	11
Cahul PI	61	28	53	38	13	11	38	24
Calarasi PI	8	-	79	79	8	-	15	15
Cantemir PI	50	50	46	38	12	12	20	18
Causeni PI	23	22	102	24	14	22	14	8
Ceadir-Lunga PI	26	12	26	15	6	9	60	26
Centru PI (Chisinau)	1	1	0	0	8	9	16	9
Cimislia PI*	9	13	19	14	3	6	1	1
Ciocana PI (Chisinau)	-	-	112	33	2	2	4	4
Comrat PI	33	19	33	13	3	31	22	10

Criuleni PI	-	-	27	27	9	19	36	36
Donduseni PI*	2	2	8	8	5	5	8	7
Drochia PI*	0	0	13	10	5	12	13	-
Dubasari PI	30	30	21	21	4	6	7	7
Edinet PI	2	2	20	16	1	1	32	10
Falesti PI	9	9	31	22	10	12	13	10
Floresti PI	29	29	26	24	7	7	5	9
Glodeni PI*	14	11	24	17	5	10	47	20
Hincesti PI**	-	-	23	23	-	-	25	25
Ialoveni PI**	-	-	30	30	-	-	25	25
Leova PI	14	14	19	16	8	8	12	9
Nisporeni PI	18	24	52	52	3	10	5	5
Ocnita PI*	10	10	13	16	10	10	23	8
Orhei PI	5	5	1	1	12	12	2	2
Rezina PI	33	23	13	12	7	14	2	2
Riscani PI*	0	0	22	21	6	6	22	15
Riscani PI (Chisinău)	0	0	358	65	4	4	11	7
Singerei PI	17	17	10	10	13	13	1	1
Soldanesti PI	30	8	16	10	4	4	10	6
Soroca PI**	-	-	33	25	-	-	34	10
Stefan-Voda PI	12	-	27	17	9	-	10	7
Straseni PI*	-	-	115	115	6	6	45	45
Taraclia PI	25	25	8	6	37	37	-	-
Telenesti PI	24	24	9	8	10	13	13	12
Ungheni PI	18	18	-	-	5	5	-	-
Vulcanesti PI	24	10	24	11	6	68	9	6

*The figures in the *request for information* source section reflect the first half of 2019 only

** No response has been provided to the requests for information submitted therein

Annex 2. Monitoring of Facebook pages

No.	Police Subdivision	Account (Page) Type	Number of likes per page	Number of friends per profile page	Page Name	Link	Account creation date	The presence of general information about the subdivision	Presence of contact data	Page Activity in 2019
1.	Chisinau mun. Directorate	Public	8352		Direcția de Poliție a mun. Chișinău (Chisinau mun. Police Directorate)	https://www.facebook.com/politiacapitalei.md/	05/09/2016	yes	yes	yes
2.	Anenii Noi PI	Private		2205	IP Anenii Noi	https://www.facebook.com/ipaneniinoi	11/07/2014	no	no	yes
3.	Anenii Noi PI	Public	128		IP Anenii Noi	https://www.facebook.com/Inspectoratul-de-politie-Anenii-Noi-112118936808674/	12/08/2019	yes	yes	yes
4.	Balti PI	Private		4996	IP Balti	https://www.facebook.com/IPBalti	24/05/2015	yes	yes	yes
5.	Basarabeasca PI	Private		729	IP Basarabeasca	https://www.facebook.com/ip.basarabeasca/timeline?lst=1665965384%3A100012953745994%3A1574196230	04/08/2016	no	no	yes
6.	Bender PI	Private		1217	IP Bender	https://www.facebook.com/profile.php?id=100012483677492&ref=br_rs	01/02/2016	no	no	yes
7.	Botanica PI (Chisinau)	Public	1401		IP Botanica	https://www.facebook.com/politiabotanica/	27/06/2016	yes	yes	yes
8.	Briceni PI	Private		986	IP Briceni	https://www.facebook.com/profile.php?id=100008126988363&lst=100002024254662%3A100008126988363%3A1581334209&sk=about	28/10/2014	no	no	yes
9.	Buiucani PI (Chisinau)	Public	2260		IP Buiucani al DP mun. Chișinău (Buiucani PI of Chisinau mun. PD)	https://www.facebook.com/IPBuiucani/	21/05/2016	yes	yes	yes
10.	Cahul PI	Private		not available	IP Cahul	https://www.facebook.com/ip.cahul	05/01/2016	no	no	yes
11.	Calarasi PI	Public	777		IP Călărași	https://www.facebook.com/CalarasiIP/	17/01/2018	yes	yes	yes
12.	Cantemir PI	Private		1349	IP Cantemir	https://www.facebook.com/profile.php?id=100006443568859	11/07/2014	yes	no	yes
13.	Causeni PI	Public	1331		IP Căușeni al IGP	https://www.facebook.com/politiacauseni/	28/10/2014	yes	yes	yes

Annex 2. Monitoring of Facebook pages

No.	Police Subdivision	Account (Page) Type	Number of likes per page	Number of friends per profile page	Page Name	Link	Account creation date	The presence of general information about the subdivision	Presence of contact data	Page Activity in 2019
					Causeni PI of the GIP					
14.	Ceadir-Lunga PI	Private		415	Ип Чадыр Лунга (Ceadir-Lunga PI)	https://www.facebook.com/profile.php?id=100041313823573&lst=1665965384%3A100041313823573%3A1580458683&sk=timeline	10/09/2019	no	no	yes
15.	Centru PI (Chisinau)	Has no facebook page								
16.	Cimislia PI	Public	1023		IP Cimişlia	https://www.facebook.com/Inspectoratul-de-Poli%C8%9Bie-Cimi%C8%99lia-502239336635053/	09/04/2016	yes	yes	yes
17.	Ciocana PI (Chisinau)	Public	1182		IP Ciocana al Direcției de Poliție a mun. Chişinău (Ciocana PI of Chisinau mun. Police Directorate)	https://www.facebook.com/IPCiocana/	28/11/2015	no	no	yes
18.	Comrat PI	Private		761	IP Comrat	https://www.facebook.com/ip.comrat.7	25/07/2016	no	no	yes
19.	ATUG PD	Public	460		Управление Полиции АТО Гагаузия (ATU Gagauzia Police Directorate)	https://www.facebook.com/upatogagauzia/	27/02/2017	yes	yes	yes
20.	Criuleni PI	Private		2069	IP Criuleni	https://www.facebook.com/ipcriuleni.criuleni?ref=search&_tn_=%2Cd%2CP-R&eid=ARC3M2Lwa_BMGHl4lt4yGwPz8vVOiiOZk6UNYypBI2apoY-P6sY6i4QseAWk7j2KjllzX_RJIIOslwMm	02/04/2013	no	no	yes

Annex 2. Monitoring of Facebook pages

No.	Police Subdivision	Account (Page) Type	Number of likes per page	Number of friends per profile page	Page Name	Link	Account creation date	The presence of general information about the subdivision	Presence of contact data	Page Activity in 2019
21.	Donduseni PI	Public	787		IP Donduşeni	https://www.facebook.com/Inspectoratul-de-Poli%C5%A3ie-Dondu%C5%9Feni-482726801911817/	21/04/2016	no	no	yes
22.	Drochia PI	Private		92	SG IP Drochia Igp	https://www.facebook.com/ip.drochia.3	05/06/2019	no	no	no
23.	Drochia PI	Private		1050	IP Drochia	https://www.facebook.com/ip.drochia	27/10/2014	no	no	yes
24.	Dubasari PI	Private		2753	IP Dubăsari	https://www.facebook.com/profile.php?id=100009277546784	31/03/2015	no	no	yes
25.	Edinet PI	Private		1051	ИП Единет (Edinet PI)	https://www.facebook.com/profile.php?id=100007459425647	20/07/2014	no	no	no
26.	Edinet PI	Private		929	IP Edineţ IP Edineţ	https://www.facebook.com/ipedinet.ipedinet/timeline?l=100002024254662%3A100042483864105%3A1581420513	17/12/2018	no	no	yes
27.	Falesti PI	Private		168	IP Făleşti	https://www.facebook.com/ip.falesti.3?fref=search&tn=%2Cd%2CP-R&eid=ARCO3RfjWXXWeDSP34HFNpizjW7K0fPkY6GwgNtdOjncPgr4RrBiB6QUgx0aSUDuL2SECabYFhc-opbY	21/08/2019	no	no	yes
28.	Floresti PI	Private		1229	IP Floreşti	https://www.facebook.com/ip.floresti	10/08/2016	yes	no	yes
29.	Floresti PI	Public	493		IP Floreşti	https://www.facebook.com/Inspectoratul-de-Poli%C8%9Bie-Flore%C8%99ti-1105045749521156/	08/04/2015	yes	no	no
30.	Glodeni PI	Public	645		IP Glodeni	https://www.facebook.com/PolitiaGlodeni/	22/03/2017	yes	yes	yes
31.	Hincesti PI	Public	1513		IP Hînceşti	https://www.facebook.com/IPHINCESTI/	05/09/2016	yes	yes	yes
32.	Ialoveni PI	Public	870		IP Ialoveni	https://www.facebook.com/politiaialoveni/	25/04/2018	yes	yes	yes
33.	Leova PI	Private		407	IP Leova	https://www.facebook.com/ip.leova.14?ref=br_rs	04/09/2019	yes	no	yes
34.	Nisporeni PI	Private		4993	IP Nisporeni	https://www.facebook.com/profile.php?id=100007518213205	18/12/2014	no	no	yes
35.	Nisporeni PI	Public	2750		IP Nisporeni	https://www.facebook.com/ip.nisporeni/	28/10/2014	yes	yes	yes
36.	Ocnita PI	Private		2622	IP Ocnîța	https://www.facebook.com/profile.php?id=100008296129415	16/05/2014	no	no	no

Annex 2. Monitoring of Facebook pages

No.	Police Subdivision	Account (Page) Type	Number of likes per page	Number of friends per profile page	Page Name	Link	Account creation date	The presence of general information about the subdivision	Presence of contact data	Page Activity in 2019
37.	Ocnita PI	Public	705		IP Ocnita	https://www.facebook.com/Inspectoratul-de-Poli%C8%9Bie-Ocni%C8%9Ba-1653315154985426/	05/09/2016	yes	yes	yes
38.	Orhei PI	Public	1297		IP Orhei	https://www.facebook.com/orheip/	05/09/2016	yes	yes	yes
39.	Rezina PI	Public	1439		IP Rezina	https://www.facebook.com/Inspectoratul-De-Poli%C5%A3ie-Rezina-1954366088222194/	13/10/2017	yes	yes	yes
40.	Riscani PI	Private		227	Serviciul Armament IP Riscani	https://www.facebook.com/serviciul.armamentri-scani	29/05/2016	no	no	no
41.	Riscani PI	Private		1146	IP Riscani	https://www.facebook.com/rusu.al.7	29/04/2016	no	no	yes
42.	Riscani PI (Chisinau)	Public	1348		IP sect. Riscani al DP a mun. Chisinau (Riscani city district PI of Chisinau mun. PD)	https://www.facebook.com/politiariscanimunicipiu/	10/11/2016	yes	yes	no
43.	Singerei PI	Private		1165	IP Singerei	https://www.facebook.com/profile.php?id=100004664297969	08/07/2014	yes	yes	yes
44.	Singerei PI	Public	215		IP Singerei	https://www.facebook.com/Inspectoratul-de-Poli%C8%9Bie-S%C3%AEngerei-502091276582316/	01/08/2016	yes	yes	no
45.	Soldanesti PI	Public	1168		IP Soldănești	https://www.facebook.com/Inspectoratul-de-poli%C8%9Bie-%C8%98old%C4%83ne%C8%99ti-806711419424829/	04/06/2015	yes	yes	yes
46.	Soroca PI	Public	1312		IP Soroca	https://www.facebook.com/Inspectoratul-de-Poli%C5%A3ie-Soroca-716342598455654/	29/09/2014	yes	yes	yes
47.	Stefan-Voda PI	Public	812		IP Ștefan-Vodă	https://www.facebook.com/politiaStefanVoda/	28/04/2016	yes	no	yes

Annex 2. Monitoring of Facebook pages

<i>No.</i>	<i>Police Subdivision</i>	<i>Account (Page) Type</i>	<i>Number of likes per page</i>	<i>Number of friends per profile page</i>	<i>Page Name</i>	<i>Link</i>	<i>Account creation date</i>	<i>The presence of general information about the subdivision</i>	<i>Presence of contact data</i>	<i>Page Activity in 2019</i>
48.	Straseni PI	Public	1621		IP Strășeni	https://www.facebook.com/Inspectoratul-de-Poli%C5%A3ie-Str%C4%83%C5%9Feni-766879853364262/?ref=br_rs	25/05/2014	yes	yes	yes
49.	Taraclia PI	Private		653	IP Taraclia	https://www.facebook.com/ip.taraclia/timeline?lst=1665965384%3A100012948400400%3A1574205670	05/09/2016	no	no	yes
50.	Telenesti PI	Private		1107	IP Telenesti	https://www.facebook.com/ip.telenesti.1/timeline?lst=100044784012611%3A100012357406889%3A1581614256	10/06/2016	no	no	yes
51.	Ungheni PI	Public	1633		IP Ungheni	https://www.facebook.com/Inspectoratul-de-Poli%C8%9Bie-Ungheni-832290130177424/	19/03/2015	yes	yes	yes
52.	Vulcanesti PI	Public	277		IP Vulcanesti	https://www.facebook.com/daigagauzia/	23/12/2017	yes	no	no
53.	Vulcanesti PI	Private		1573	IP Vulcanesti	https://www.facebook.com/ip.vulcanesti	18/06/2016	yes	yes	yes

Annex no. 3. (1.4.8.) Equipment provided to police inspectorates and police stations operating under their authority

Subdivision	The position of territorial subdivisions of the GIP ¹⁰¹		The position of central apparatus of the GIP
	The share of endowment with specialized equipment	The share of uniforms provided	The share of uniforms/equipment provided to the staff of PIs ¹⁰²
Balti PI	60%	Total: 80% (30%- women, 50 %- men)	93%
Falesti PI	100%	100%	100%
Nisporeni PI	-	employees received patrol suits, headgear, hooded jackets, boots.	100%
Telenesti PI	35%		100%
Ungheni PI	-	58 utility uniforms were provided	93%
Edinet PI	The staff of the community interaction service of the Public Security Division was fully equipped with work templates and multifunctional belts.	Utility uniforms are provided annually (spring summer-autumn patrol suits and partly winter uniforms, as well as partly footwear (only autumn and winter boots) within the limits of available stocks. From 2014 to the present day, the staff did not receive any office uniform, spring-summer footwear, etc.	95%
Basarabeasca PI	The staff of Basarabeasca PI was provided with specialized equipment and utility uniforms; foremost, both police stations and employees of the Public Security Division were provided with the necessary equipment.		98%
Floresti PI	-	40 employees were provided with utility uniforms.	98%
Leova PI	14% There are cases where the assigned utility uniform is of small or large sizes, incompatible with the actual size of the employees' wear.		98%
Bender PI	Employees of Bender PI were equally equipped with special means and utility uniforms regardless of gender.		98%
Cahul PI	All employees within the inspectorate were provided with equipment (utility uniforms) for all seasons.		98%
Calarasi PI	All employees (100%) in the Public Order Division were provided with multifunctional belts.	70% of the staff was fully provided with utility uniforms.	98%
Cantemir PI	-	Both men and women were provided in 2019 with uniforms but not fully.	98%
Dubasari PI	-	34 police uniforms were provided in 2019.	95%

¹⁰¹ Based on responses to requests for information submitted to police inspectorates.

¹⁰² Based on data collected from official documents: such as contracts, other bookkeeping documents.

Taraclia PI	The PI requires both special equipment and uniforms, the term of use of the uniform being expired.		74%
Rezina PI	-	75%	85%
Vulcanesti PI	80%		97%
Soldanesti PI	Equipment was provided partially in the spring and autumn of 2019.		98%
Stefan- Voda PI	-	At the moment all employees have partially complete utility uniforms i.e. winter uniforms (jackets, footwear) being equipped especially only the Public Security Service.	95%

Annex no. 4. (A. 1.2.) The share of women in both specialized and territorial subdivisions of the GIP

Subdivision of the GIP	Women	Men	Total	Share of women %
"Fulger" SPPB	12	352	364	3.297
Dubasari PI	10	152	162	6.173
Edinet PI	9	133	142	6.338
Floresti PI	10	118	128	7.813
NPI	100	919	1019	9.814
Bender PI	16	146	162	9.876
Glodeni PI	8	65	73	10.959
Police Dog Directorate of the GIP	1	8	9	11.111
Cimislia PI	9	66	75	12.000
Rezina PI	11	79	90	12.222
Ungheni PI	20	143	163	12.269
Rascani PI	12	82	94	12.765
Stefan Voda PI	14	94	108	12.963
Soldanesti PI	11	72	83	13.253
NII	51	329	380	13.421
Telenesti PI	12	71	83	14.458
Drochia PI	18	102	120	15.000
Briceni PI	17	96	113	15.044
Hancesti PI	21	114	135	15.556
Soroca PI	24	128	152	15.789
Balti PI	39	208	247	15.789
Leova PI	13	67	80	16.250
Causeni PI	22	111	133	16.541
Chisinau mun. PD	78	393	471	16.561
Donduseni PI	15	73	88	17.045
Criuleni PI	20	93	113	17.699
Anenii Noi PI	19	85	104	18.269
Sangerei PI	19	82	101	18.811
Taraclia PI	15	63	78	19.231
Falesti PI	20	83	103	19.417
Nisporeni PI	17	70	87	19.540
Basarabesca PI	11	44	55	20.000
Ocnita PI	18	65	83	21.687
Riscani PI	35	121	156	22.436
Cantemir PI	23	75	98	23.469
ATU Gagauzia PD	58	199	257	22.568
GDPS	8	25	33	24.242
Ciocana PI	38	113	151	25.166
Interactional Justice Division	23	64	87	26.437

Botanica PI	40	108	148	27.027
Calarasi PI	22	59	81	27.160
Ialoveni PI	24	63	87	27.586
Straseni PI	31	81	112	27.679
Orhei PI	39	101	140	27.857
Centru PI	40	100	140	28.571
Cahul PI	48	108	156	30.769
Buiucani PI	46	100	146	31.507
GDCI	11	22	33	33.333
FJEC	52	80	132	39.394
DCPI	14	13	27	51.852

Annex no. 5**Service vehicles observed by Promo-LEX monitors**

No.	Police Unit	Vehicle Model	Manufacturing Year	Year of receipt	Maximum number of detainees allowed to be transported in a service vehicle
1.	Edinet PI	Ford Transit	2017	2019	12
2.	Edinet PI	Ford Transit	2017	2019	8
3.	Edinet PI	Ford Transit	2014	2019	12
4.	Floresti PI	Volkswagen T4	2002	2012	6
5.	Straseni PI	Ford Transit	2017	2019	12
6.	Riscani PI	Ford Transit	2017	2019	8
7.	Causeni PI	Ford Transit	2018	2019	10
8.	Causeni PI	Ford	2017	2018	10
9.	Orhei PI	Ford Transit	2017	2019	14
10.	Criuleni PI	Ford Transit	2017	2018	12
11.	Balti PI	Ford Transit	2017	2018	10
12.	Cantemir PI	Mercedes	No data available	No data available	2
13.	Singerei PI	Ford Transit	2017	2018	8
14.	Falesti PI	Ford Transit	2017	2019	8
15.	Cimislia PI	Ford	2017	2019	12
16.	Chisinau mun. PD	Ford	2017	2018	12
17.	Chisinau mun. PD	Ford Transit	2014	2015	10
18.	Chisinau mun. PD	Ford Transit	2016	2017	10
19.	Chisinau mun. PD	Ford Transit	2016	2017	10
20.	Chisinau mun. PD	Ford Transit	2018	2019	12
21.	Chisinau mun. PD	Ford Transit	2018	2019	12
22.	Chisinau mun. PD	Ford	2018	2019	8
23.	Ceadir-Lunga PI	Mercedes	2006	2014	6
24.	Comrat PI	Ford	2017	2019	6
25.	Comrat PI	Mercedes	No data available	No data available	5
26.	Anenii Noi PI	Ford Transit	2017	2018	10
27.	Cahul PI	Ford Transit	2017	2019	8
28.	Cahul PI	Ford Transit	2017	2018	12

Annex no. 6 (Objective 2) A.2.1.

The findings of Promo-LEX monitors on the compliance of Provisional Detention Isolators with the minimum mandatory norms for detention facilities within the Police, approved by GIP Order no. 527 of 28.12.2017:

- ✓ all isolators visited are located in the headquarters of the police inspectorate, police directorate respectively;
- ✓ all PDI premises are delimited by the PI administrative headquarters;
- ✓ the perimeter of all PDIs and the access points to the PDIs' premises are secured with video surveillance systems;
- ✓ Fire Protection elements are available in the PDIs' premises;
- ✓ the accommodation sector in all PDIs includes a reception and body search point, storage rooms, work-room for Police employees, detention facility/accommodation facility, rooms for examination and provision of medical care, consultation and carrying out epidemiological triage, work-room for carrying out criminal proceedings, rooms for ensuring the meeting between the lawyer and the suspect in confidential conditions, kitchen unit (food distribution), sanitation and hygiene facility and spaces for outdoor activities;
- ✓ the administrative sector in all PDIs is comprised of work-rooms for Police staff ensuring both safe-keeping and supervision of detainees, premises for medical examination and rooms for providing legal assistance;
- ✓ the detention rooms observed in all isolators have at least 4 sq. m. for each detainee, in the case of shared accommodation, and at least 7 sq. m. in the case of individual accommodation;
- ✓ the distance between the walls of the detention rooms observed in all isolators is at least 2 m while the distance between the floor and the ceiling is at least 2.5 m;
- ✓ there are rooms for prisoners with special needs in six PDIs (Causeni, Edinet, Chisinau, Cimislia, Cahul, Riscani) and there are no such rooms in two PDIs (Singerei, Orhei);
- ✓ the sanitation and hygiene facilities observed in all isolators are separated from the rest of the room by a partition, being properly ventilated so as to prevent moisture and mold;
- ✓ the detention premises are connected to both drinking water systems and sewerage systems;
- ✓ the heating is connected and thermal comfort is provided during the cold period of the year in the accommodation rooms within all the isolators, these also having ventilation systems and natural lighting in place (proper lighting for reading during the day), having also installations necessary to provide artificial lighting and intercom systems;
- ✓ radio systems are installed in all the accommodation rooms observed within all the isolators, with the exception of the PDI of Chisinau PD;
- ✓ the rooms for examination and provision of medical care, consultation and carrying out epidemiological triage within all the isolators are equipped with heat batteries, window with bars, table, chairs, bed for medical examination, sink, water supply installations, sewerage, sockets, refrigerator, safe box/locker to keep the results of the medical examination of detainees as well as other personal data confidential;
- ✓ the rooms for examination and provision of medical care, consultation and carrying out epidemiological triage within all the isolators, with the exception of those from Chisinau and Causeni, are equipped with shelf for sink, emergency button (alarm), metal door;
- ✓ the rooms for medical examination in all isolators have a sufficient area, are clean, naturally illuminated, provided with reasonable thermal comfort and provide convenient access for people with special needs;
- ✓ the rooms for medical examination in all isolators, with the exception of Causeni PDI¹⁰³ have premises for confidential medical consultations and exams of private doctors or other external medical specialists;
- ✓ the kitchen unit in all isolators visited is equipped with the necessary facilities for heating food, for keeping perishable and imperishable food, keeping food samples, washing dishes, storing dishes, refrigerating spaces;

¹⁰³ The premises for medical examination are composed of a single room and do not include a separate room for medical consultation of private doctors, or other external medical specialists.

- ✓ All provisional detention isolators have a courtyard for walks, with the exception of the PDI of Chisinau PD, which has three courtyards of this kind. The access to these courtyards is permissible from inside the PDI. The courtyards are partially covered, to allow the right to take walks daily and in bad weather. The arrangement of the courtyards allows the permanent supervision of the detainees¹⁰⁴ and the penetration of natural light and ensures conditions that do not allow the reception or transmission by the detainees of external goods or documents;
- ✓ the service office of the police officer guarding and supervising the detainees, is located outside the accommodation sector in all isolators, except the PDI of Cahul;
- ✓ connection and alarm systems are provided between the duty officer's room and the PDI in all isolators;
- ✓ all rooms intended for carrying out criminal investigation activities, observed in provisional detention isolators, are sufficiently well lit, heated and ventilated. Panic buttons are mounted in offices for carrying out prosecution activities in provisional detention isolators, except the PDI of Chisinau mun. PD, where panic buttons are mounted on the outside (in the hallway).
- ✓ the interrogation rooms in all the PDIs visited are equipped with electronic, audio/video recording systems, being installed in such a way as to encompass all participants of the proceedings. At the same time, when the persons in charge within the provisional detention isolators were asked about the place of storage of information from electronic, audio/ video recording systems, the majority of respondents (7) stated that the records are stored on a server within the isolator, the information retention period being one month (2). On the same lines, when asked about the frequency with which they use these electronic, audio/ video recording systems, the respondents either stated that they do not know anything about it (3) or avoided answering this question, either that the video cameras are always used, monitored 24/24 by the guardian, or the participants in the proceedings are constantly supervised, so as not to be subjected to any danger.
- ✓ no elements that may involve a risk of intimidation of the person questioned were observed in the interrogation rooms within the provisional detention isolators.

¹⁰⁴ At least the courtyards of the PDI under Cimislia PI, Singerei PI and Orhei PI are covered by video surveillance.

Annex no. 7 (Objective 2) A.2.1.

The findings of Promo-LEX monitors on the compliance of specialized vehicles with the Minimum Norms on equipping and retrofitting the specialized vehicles intended for the transportation of persons in the custody of the Police, approved by the GIP Order no. 527 of 28.12.2017

- ✓ There are 24 specialized vehicles of Ford Model, 3 of Mercedes Model and 1 of Volkswagen Model;
- ✓ Some specialized vehicles were transmitted for use at a distance between 5 and 10 years from their year of manufacture (see Chart no. 16):
 - a) one specialized vehicle was manufactured in 2002, but transmitted to the police unit in 2012 (Floresti PI),
 - b) one specialized vehicle was manufactured in 2006, but transmitted to the police unit in 2014 (Ceadir-Lunga PI),
 - c) two specialized vehicles were manufactured in 2014, but transmitted to the police units in 2015 (Chisinau PD) and in 2019 respectively (Edinet PI),
 - d) two specialized vehicles were manufactured in 2016 but transmitted to the police unit in 2017 (Chisinau PD),
 - e) seven specialized vehicles were manufactured in 2017 but transmitted to the police units in 2018, while nine specialized vehicles were transmitted in 2019,
 - f) four specialized vehicles were manufactured in 2018, but transmitted to the police units in 2019.
- ✓ all the vehicles observed have at least two compartments: the driver's compartment and detainees' seating area, the driver's compartment being completely separated from the detainees' seating area by a bulkhead, ensuring a high level of protection for police employees;
- ✓ the maximum number of detainees that can be transported by the vehicles observed ranges from 2 to 14;
- ✓ in the case of specialized vehicles, where the maximum number of transported detainees is more than eight persons, including (23 specialized vehicles), the detainees' seating area is designed both for arranging the boxes for detainees and for police personnel supervising and guarding the detainees. In the case of specialized vehicles capable of transporting up to 2-6 detainees (5 specialized vehicles), the detainees' seating area is not provided with space for police personnel. At the same time, there is no seat for police employees, whom would ensure the continuous supervision of the persons escorted in three of these specialized vehicles.
- ✓ in 26 specialized vehicles, the detainees' seating area is designed with at least two boxes, these being separated from each other by a partition wall, built over the entire height of the compartment. Two specialized vehicles (belonging to Floresti PI, Cantemir PI) have no such boxes, the detainees' seating area being common;
- ✓ each compartment in all specialized vehicles observed, with the exception of one vehicle under the management of Cantemir PI is provided with seats of reasonable size corresponding to the number of persons transported;
- ✓ 25 specialized vehicles have seats equipped with immobilizer for handcuffs, while in three specialized vehicles managed by Cantemir PI, Comrat PI and Ceadir-Lunga PI, such immobilizer for handcuffs has not been seen;
- ✓ non-slip resistant tape is applied on the surface of the seats in only 17 specialized vehicles (60.71%) of the 28 observed;
- ✓ seat belts are provided and fitted for each seat intended for persons transported in 24 vehicles. No seat belts are provided in four specialized vehicles managed by Floresti, Edinet, Cantemir and Comrat PIs;
- ✓ according to the respondents, the detainees' seating area is sufficiently well heated to ensure reasonable thermal comfort during the cold season in 21 specialized vehicles (75%), heating systems being installed in the transport unit, or additional heating systems being added to maintain the temperature when the specialized vehicle is stationary;

- ✓ air nozzles are installed in 24 specialized vehicles (85.7%) so as to ensure that all compartments/boxes are properly ventilated;
- ✓ all the boxes intended for the transportation of detainees in 26 specialized vehicles have proper natural and artificial lighting;
- ✓ in only 12 specialized vehicles (42.85%), the windows in the compartment intended for the transportation of detainees are shaded, in order to avoid public exposure, protect them from insults, public curiosity and any other acts of intimidation;
- ✓ systems of monitoring the location and drive direction of the specialized vehicles (GPS trackers) are installed in 23 specialized vehicles. However, when asked about where the information is kept and who monitors the location of the specialized vehicles, four respondents stated that the information is kept on the server of the police inspectorate, eight people replied that the monitoring is carried out by the General Inspectorate of Police or the Information Technology Service of the MIA, and two others said that they do not know anything about it.
- ✓ only 11 specialized vehicles (39.28%) of the 28 observed, are equipped with video monitoring systems. At the same time when asked about the frequency with which they use these video monitoring systems, the place and term of information storage, the respondents offered different answers: 5 replied that they do not know anything about the place of information storage, 4 stated that the information is stored on the information storage device available in the vehicle, 1 said that it is stored on the server within the PDI, another 1 stated that it is stored by a central authority. On the same lines, three persons stated that the video monitoring system is used permanently/while transporting the detainees; a single person stated that it is used when aggressive people are being transported only.

Annex 8 - A.4.1.

The findings of Promo-LEX monitors on meeting the technical requirements for the functioning of the Police Station, approved by the GIP Order no. 286 of June 22nd, 2018:

- all headquarters are located in places easily accessible to the public, next to public roads, so as to be seen by people;
- road signs indicating the location of the headquarters of the police stations "Police 300 m" type are installed on the main routes of the locality only in the case of five police stations (PS no.1 Basarabasca, PS no. 1 Comrat, PS no. 1 Soldanesti, PS no. 3 Costesti, Ialoveni, PS no. 1 Falesti);
- all the headquarters are located on the first level of the building and are accessible to people with locomotor disabilities;
- the facade, sides and roof, in the case of ten police stations, contain the colors of gray and blue characterizing the Police. That is except for the following police stations: PS no. 1 Mindresti, Telenesti and PS no. 5 Serpeni, Anenii-Noi;
- there is an information panel in the immediate vicinity of the area of the police station only in the case of PS no. 1 Soldanesti;
- information plates bearing the markings of the police are placed at the entrance of all headquarters of the police stations;
- according to Promo-LEX monitors, based on the interviews conducted with the persons in charge of police stations, only half of the headquarters of the police stations have a total area between 90 and 200 sq. m., three police stations having an area between 65 and 85 sq. m. (these are: PS no.1 Comrat, PS no.1 Floresti, PS no.1 Soldanesti), while four police stations having an area between 240 and 272 sq. m. (these are: PS no. 1 Drochia, PS no.4 Riscani, Chisinau, PS no.1 Causeni, PS no. 1 Falesti). It should be noted that the planned dimensions have been established by way of recommendation;
- in all police stations, the area of the head's office is at least 8 sq. m. It should be noted that the planned dimensions have been established by way of recommendation;
- the interrogation rooms under conditions of confidentiality have an area of at least 8 sq. m. in 11 police stations. This requirement is also not met by the following police stations: PS no. 5 Serpeni, Anenii- Noi, PS no. 1 Mindresti, Telenesti, PS no. 1 Comrat. It should be noted that the planned dimensions have been established by way of recommendation;
- the area of the meeting room is at least 20 sq. m. in nine police stations. This requirement is also not met by the following police stations: PS no. 4 Riscani, Chisinau, PS no. 1 Soroca, PS no. 1 Causeni, PS no. 5 Serpeni, Anenii-Noi, PS no. 1 Comrat. It should be noted that the planned dimensions have been established by way of recommendation;
- the hall of the headquarters has an area of at least 10 sq. m. in most (13) renovated police stations. That is except for the PS no. 5 Serpeni, Anenii- Noi. It should be noted that the planned dimensions have been established by way of obligation;
- all police stations have sanitary rooms, however the PS no. 1 Cimislia is not connected to the water supply system, that makes it impossible to use the sanitary room in the PS;
- the service room (server, storage closet) is provided in most of the renovated police stations. That is except for the PS no. 1 Mindresti, Telenesti; It should be noted that the planned dimensions have been established by way of recommendation;
- an eating room and an employee lounge room is available in all police stations. It should be noted that the planned dimensions have been established by way of recommendation;
- a car storage and service unit (parking, garage) is ensured by 11 police stations. No such unit is provided by the following police stations: PS no. 1 Basarabasca, PS no. 1 Cimislia, PS no. 1 Causeni; It should be noted that the planned dimensions have been established by way of recommendation;
- the employee's work station in all monitored police stations consists of a desk, chair for the employee, chair for the visitor, computer;
- there are automatic fire detection installations and fire alarm and extinguishing systems in most headquarters of the police stations. That is except for the PS no. 1 Mindresti, Telenesti;

- the security of the premises of seven police stations is carried out by the electronic-sound method, the security of one premise is carried out by the video method, the security of five police stations is carried out by both electronic-sound and video methods. At the same time, the security of a headquarter of the police station is not ensured.
- Additionally, although not a mandatory criterion, offices for non-profit organisations are organized within the premises of nine police stations that could help police employees based on their areas of competence. There are no such offices in the following police stations: PS 1 Comrat, PS 1 Soroca, PS 1 Cimislia, PS 5 Serpeni, Anenii-Noi, PS 1 Mindresti, Telenesti.

Annex no. 9 (A 4.3.)

Number of the existing patrol response teams and number of such teams necessary for reducing the response time in each Police Inspectorate, according to the PI management

The Police Unit	Number of patrol response teams	Number of teams needed
Anenii Noi PI	3	5
Balti PI	8	10
Basarabasca PI	1	2
Bender PI	1	1
Briceni PI	3	4
Cahul PI	8 (3 night-shift teams and 5 day-shift teams)	12 (6 day-shift teams and 6 night-shift teams)
Calarasi PI	2	2
Cantemir PI	2	2
Causeni PI	2	3
Ceadir-Lunga PI	1	4
Cimislia PI	1	3
Comrat PI	1	2
Criuleni PI	2	4
Donduseni PI	2	3
Drochia PI	3	
Dubasari PI	3	3
Edinet PI	5	5
Falesti PI	3	4
Floresti PI	2	4
Glodeni PI	2	2
Hincesti PI	2	3
Ialoveni PI	2	4
Leova PI	4	5
Nisporeni PI	2	4
Ocnita PI	1	3
Orhei PI	3	5
Rezina PI	3	5
Riscani PI	1	4
Singerei PI	2	4
Soldanesti PI	2	2
Soroca PI	2	4
Stefan-Voda PI	3	4
Straseni PI	2	5
Taraclia PI	1	2
Telenesti PI	3	4
Ungheni PI	3	5