

Current risks factors used by the National Integrity Agency in the v-DAI platform

- **Potential false data**

Why is this important? This alert detects errors in declaring the income, by flagging those disclosures in which the officials report no salary income. With the exception of newcomers to the workforce, most officials generally have some form of employment or income source. By focusing on disclosures with zero reported salary income, this alert helps identify potential inaccuracies and omissions in asset disclosures.

- **Potential illegal tenure of public office**

Why is this important? This alert detects officials who, despite being under the 3-year interdiction to occupy a public office or dignity, continue to submit asset and interest disclosures, thereby indicating active involvement in public office. This alert is of paramount importance in uncovering situations where officials who breach the conditions of their interdiction.

- **Potential breach of incompatibility rules**

(i) Why is this important? Two different alerts, one targeting members of the Government and MPs (offices bound by specific integrity rules) and one targeting mayors and deputy mayors, stemming from analysing the following declared:

- Income from independent activities;
- Income from other sources;
- Membership in management bodies of commercial entities;
- Contracts with the state.

Through incomes earned outside of official duties, indications of involvement in external activities may conduct to the identification of a possible incompatibility state.

(ii) Why is this important? This alert detects certain categories of public officials declaring the holding of management position within political parties or solely party members, which may lead to an incompatibility state.

- **Potential breach of conflict of interest rules**

Why is this important? This alert detects contracts with the state concluded by local elected officials, their family or the company held by their family members, determining potential conflicts of interest.

- **Potential risks of biased decision-making (currently under testing)**

(i) Why is this important? This alert detects gifts, services, donations, advantages, etc., as well as movable and immovable goods obtained through a donation contract above a certain threshold, integrity risks that may compromise the ability of an official or dignitary (especially those working in sensitive sectors such as the judiciary, internal affairs, Parliament, etc.) to serve the public interest.

(ii) Why is this important? This alert detects obtained awards, possible integrity risks that may compromise the ability of officials to serve the public interest in an objective manner.

- **Potential false data or unjustified wealth (currently under testing)**

(i) Why is this important? This alert detects loans granted in a personal capacity above a certain threshold, thus identifying if the official had the necessary financial means grant.

Also, it can lead to the determination of a significant unjustified difference between the wealth acquired and the incomes achieved (in case the loans granted exceed the incomes obtained or the financial availability of the declarant), an incompatibility (in case the loans are granted in personal name to a company where the respective person holds a position, contrary to the legal provisions) and also a conflict of interest.

(ii) Why is this important? Through contrasting the information related to debts above a certain threshold (cash-out) and those under the income heading (cash-in), this alert detects whether the declarant has the necessary financial means to repay these debts within the specified terms.

As with loans, alerts can lead to the determination of a significant difference (if the amount borrowed is clearly disproportionate to the monthly or annual financial means available to the declarant's family) or a conflict of interest (if the declarant, who has a patrimonial interest towards the creditor, would make decisions in favour of the creditor).

- **Potential breach of the submission rules**

Why is this important? Under Law no. 176/210, annual disclosures shall be submitted by June 15. Previously, ANI faced challenges in identifying all the disclosures submitted after the deadline. However, through this alert, the inspectors are now signalled on those disclosures filed past the date provided by law.

Overall, the evaluation activity carried out by ANI will be improved by:

- Introduction of an exhaustive perspective on all disclosures submitted in a declaration cycle;
- Real-time identification of problematic disclosures (disclosures with increased risk of an integrity incident);
- Focusing the verification activity on risk areas;
- Reducing the duration of the evaluation activity for a case;
- Pro-active approach in selecting cases for evaluation (investigation).