



INSPECTORATE GENERAL OF HOME AFFAIRS  
(*INSPEÇÃO-GERAL DA ADMINISTRAÇÃO INTERNA – IGAI*)

# PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED OFFENCES

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## I. CONCEPT. SCOPE AND OBJECTIVES

1. There is nowadays a national and international context of fast uncertainty and change that must be closely surveyed by the organisations, which signifies that the management of the risk has a significant impact in their *modus faciendi*, considering their duty of active partners.

Corruption constitutes a serious obstacle to the regular operation of all institutions – either in the public or private sectors, or even in international transactions. It is a phenomenon that takes a transnational character and thus currently constitutes one of the greatest worries, not only for the several Member States of the European Union but also for international organisations with a global and regional scope of action. It is therefore a threat to the democratic State based on the rule of law and (seriously) impairs the normal relationship between the citizens and the Public Administration, having at the same time negative implications in the (desired) development of the economies, the regular operation of the markets and the free and healthy competition.

The Council for the Prevention of Corruption (CPC), an independent administrative entity that operates at the Court of Auditors, develops its activity, of a national remit, in the area of the prevention of corruption and related offences<sup>1</sup>. In the scope of its attributions and competencies, it recommended that the head officials of the entities that have the management of public funds, values and assets should draw up plans for controlling the risks of corruption and related offences – Recommendation of the CPC No. 1/2009, of the 1st of July 2009<sup>2</sup>.

The first Plan for the Management of Risks of Corruption and Related Offences of the Inspectorate General of Home Affairs (IGAI) was thus drawn up in 2009<sup>3</sup>. It is now important, also following further recommendations of the CPC<sup>4</sup>, to review it.

IGAI's Plan for the Prevention of Risks of Corruption and Related Offences (hereafter referred to as the Plan), aiming at establishing guidelines about the management of risks, is an instrument to ensure the implementation of a preventive culture of corruption. It is thus a dynamic and

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<sup>1</sup> Law No. 54/2008, of 4 September 2008.

<sup>2</sup> Published in the Official Gazette, Series II, No. 140, of 22 July 2009.

<sup>3</sup> It was approved by Decision IG No. 26/2009, of 4 December 2009.

<sup>4</sup> Namely Recommendation of the 1st of July 2015. We must note, however, that since its Recommendation No. 1/2010, of 7 April 2010, the CPC itself began to adopt the designation "Plan for the Prevention", which was considered consolidated, replacing thus the expression "Plan for the Management".

reversible instrument, but also a model and stabilizer of referrals and values of transparency, accountability, specialisation and simplification of proceedings that guide the leadership of organisations according to the principles of the New Public Management.

The Plan's main objective is the reinforcement of the generalisation of domestic practices of accountability and their own monitoring through the identification of the great areas of risk by kind of activity, the establishment of criteria of graduation of risks and the implementation of measures to minimise their occurrence.

It necessarily has into account the changes in the operational environments, namely the growing complexity and dispersion of laws and rules or the increased use of continuously changing technologies.

Finally, the Plan asks for the involvement of all the IGAI personnel – to begin with, the Executive Board itself – in order to interiorise the principles and values that are inherent to it and its implementation in the developed activities, on-going projects and pursued mission.

2. The Plan applies to *all operational interactions established by or with personnel working at IGAI* – either between themselves (strictly internal relations, even without hierarchic subordination) or in contacts with third parties (which include public bodies, services, organisations or entities and providers of public services and their personnel or officials).

The Service itself (IGAI) and its personnel are necessarily subjected to *imperative or restrictive (positive and negative)* normative referrals – to begin with, of constitutional scope<sup>5</sup> but, more frequently, of legal scope<sup>6</sup>. Thus, it is not a mere enumeration of duties that needs to be

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<sup>5</sup> Cf., namely, Article 266, paragraph 1, of the Constitution (CRP), which establishes that the performance of public duties by administrative services and officials – which shall “exclusively be at the service of the public interest” (Article 269, paragraph 1) – must be guided by the principles of equality and proportionality, justice, impartiality and good-faith. Coherently, a presumptive prohibition of accumulation of jobs or public functions are since then assumed, as well as a tendency of incompatibility “between the performance of public functions and other activities” (paragraphs 4 and 5 of the same Article 269).

<sup>6</sup> First of all, the General Labour Law in Public Functions (*Lei Geral do Trabalho em Funções Públicas* - LGTFP), published as an Annex to Law No. 35/2014, of 20 June 2014, which is particularly extensive regarding the clarification of the general duties of any employee who, regardless of the bond of public employment, performs public functions (cf. Articles 70 and 73, paragraph 2). On the other hand, among the negative normative referrals (restrictive), there are plenty of distinctive criminal rules that require the condition of “holder of public functions, civil servant or official of the Administration” (cf. Article 6, paragraph 1, of the Criminal Code; cf. also its Article 386), but also non-criminal rules (for instance, Article 24 of the LGTFP).

addressed by the Plan but rather a clarification of systemic circumstances of risk that need a systematized particular attention<sup>7</sup>.

Accordingly, these are the aims of the Plan: (i) the identification of the risks of corruption and related offences, regarding each area of activity, attribution or mission; (ii) the specification of preventive measures and control mechanisms of occurrences that may give cause or facilitate the risk; (iii) the definition and identification of the responsible persons for the application and monitoring of the Plan.

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After a brief characterisation of IGAI (point II) and a methodological specification (point III), the Plan will be presented (point IV) and associated proposals will be formulated, in a perspective of management, to the deepening of the organisational culture (point V), leaving to the annexes to make a characterisation of the organisational structure and available resources (Annex 1), a table of normative referrals of conduct (Annex 2) and a preparatory survey regarding the risks of corruption and related offences (Annex 3).

## **II. BRIEF CHARACTERISATION OF IGAI: MISSION, ATTRIBUTIONS, VALUES**

1. IGAI is, since its creation, a service of control and supervision especially focused on the *control of legality* in surely one of the most sensitive areas of operation of a democratic State based on the rule of law: that of the exercise of the powers of authority and the legitimate use of means of coercion by the Security Forces and Services (*Forças e Serviços de Segurança* - FSS), whose performance, considering their specific characteristics, may conflict with the *fundamental rights, freedoms and safeguards* of the citizens.

As a matter of fact, IGAI – and this is the legal characterisation of its mission<sup>8</sup> - ensures the high level functions of audit, inspection and control, regarding all entities, services and bodies which answer to or whose activity is legally supervised or regulated by the member of the Government responsible for the area of home affairs. IGAI identifies as specific expressions of its mission, deriving from that legal text, to increase the dignity of the FSS through the inducement and implementation of police behaviour more compatible with the exercise of citizenship, as well as

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<sup>7</sup> We do not reject the “virtue” of awareness of obligations, whose clarification, in the Plan, of the risks of conduct implies in itself, nor the corresponding reflex, in the intellectual and volition levels of conduct of the authors.

<sup>8</sup> Article 2, paragraph 1, of Decree-Law No.58/2012, of 14 March 2012.

to contribute to a better and more expedite administration of the disciplinary justice in situations of a greater social relevance.

2. The attributions of IGAI may – considering as a prime reference the *institutional scope of Home Affairs* (subjective scope), the organisational structure and resources of IGAI (Annex I) and the normative referral that presides over its action (Annex II) — be thus summarised:

[A] - Regarding its *objective focus*:

- a) Serious violation of the fundamental rights of the citizens by the services or their officials<sup>9</sup>;
- b) Violations of the legality, including those of disciplinary nature and facts with legal and criminal relevance<sup>10</sup>;
- c) Accomplishment of missions, of legal rules and regulations and of instructions regarding the activity of services and entities;
- d) Irregularities or faults regarding the operation of the services;
- e) Efficiency and efficacy of the services;
- f) Management and execution of financed projects with participated external funds<sup>11</sup>.

[B] – Regarding the specifically available *juridical and procedural legal mechanisms*:

- a') Evaluation inspections, using methods of audit and assessment of legality;
- b') Audits and surveys in order to evaluate the efficacy and efficiency of the services;
- c') Proposition of legal measures regarding the development of the quality and efficacy and enhancement of the entities, services and bodies;
- d') Inquests, audits and expertise actions (subject to hierarchic determination);
- e') Inquests and disciplinary proceedings (subject to hierarchic determination);
- f') Instruction or cooperation in the instruction of proceedings started in the remit of the service (subject to request and authorisation of collaboration);

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<sup>9</sup> It must be noted that IGAI may also open inquiries regarding alleged facts that constitute a serious violation of the rights, freedoms and safeguards of the citizens that are committed by officers of the municipal police forces in the exercise of their police functions, when in conformity with the provisions of paragraph 2 of Article 10 of Law No. 19/2004, of 20 May 2004.

<sup>10</sup> IGAI, in its role of sectorial inspectorate, may open inquiries of regulatory offences by reason of discriminatory acts based on racial or ethnic motivation, which shall be the object of decision by the High Commissioner for Migrations (cf. Articles 12 and 13 of Law No. 18/2004, of 11 May 2004).

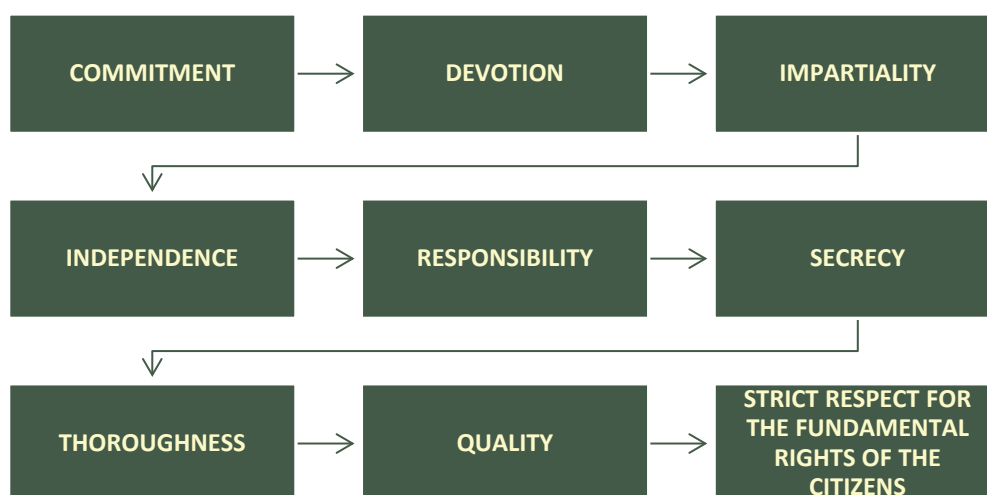
<sup>11</sup> Namely UE funds. IGAI has thus, in its Multiannual Budgetary Plan for the years 2014–2020 for the area of Home Affairs, competence to carry out the control over the execution of the Internal Security Fund (*Fundo para a Segurança Interna* - FSI) and the Asylum, Migration and Integration Fund (*Fundo Asilo, Migração e Integração* - FAMI).



- g') Collaboration with the competent bodies of criminal investigation to gather evidence (subject to request);
- h') Second level control over the management and execution of financing projects;
- i') Inquiry into media reports;
- j') Evaluation of complaints, grievances and reports of alleged illegalities;
- k') Communication of criminally relevant facts.

Considering its areas of intervention, and according to the planned strategy, IGAI aims to be recognised as an entity that promotes the quality of its services and the excellence of all bodies under the authority of the MAI, always having in mind the *safeguard of the fundamental rights of the citizens in pursuit of a better citizenship*. Especially, it intends to achieve aims and strategies that concern the problematic of police behaviour towards citizenship and the nucleus of fundamental rights: the better, in terms of evaluation of the quality, the performance of the services and of the police forces, the more assured are the rights of the citizens, laying a particular stress on their safety as an individual right that corresponds to the exercise of freedom.

3. For the development of its activity, and having in mind the assurance of a common institutional culture, IGAI and its collaborators are guided by the following *ethical principles*:



### III. METHODOLOGY

The *management of risks* leads to a controlled conduct in several moments:

- ▶ *Identification and definition of the risk* — acknowledgment and classification of the events whose probability of occurrence and corresponding seriousness of results comprise risks of management, including risks of corruption and of a related nature;
- ▶ *Analysis of the risk* — classification of the risk in accordance with criteria of probability and seriousness of occurrence, establishing sets of criteria, measures and actions, having in mind if the consequences will be of a strategic or operational nature;
- ▶ *Degree of the risk* — derives from the combination between the probability of occurrence of an event (activity, procedure or action) susceptible, in itself, of causing or comprising a risk (PO) and the seriousness of the consequence of the real occurrence of the risk that was not eliminated, minimised or transferred (foreseen impact of the damage or harm — FI):

Probability of Occurrence [PO]	Low[1]	Medium [2]	High [3]
	Possibility of occurrence of an event susceptible of causing or comprising a risk.	Possibility of occurrence of an event which causes damage, frequent in routine activities.	Strong possibility of occurrence of an event that comprises a risk.

Foreseen Impact [FI]	Low [1]	Medium [2]	High [3]
	Damage regarding the optimisation of organisational performance.	Loss in management of operations. It requires the redistribution of resources by time and costs.	Damage to the image and reputation of institutional integrity, as well as the efficacy and performance of the mission.

Graduation of the Risk [GR]	WEAK [C]	MODERATE [B]	GREAT [A]
	The risk is deemed prevented or controlled with the measures prescribed in the Plan; its occurrence imposes a schedule of the activities or projects.	The risk may be prevented or controlled by additional decisions and actions; it makes possible a re-distribution of resources by time and costs.	Difficulty in controlling the risk, even with additional decisions and actions; non-tolerance of the performance of actions or omissions that act together for its happening.

## 1. Identification of the measures for the prevention of the risks

Once the risks identified, it is necessary to establish measures to avoid them (elimination of the cause), to prevent them from occurring (minimisation of the probability of occurrence of the risk or of its negative impact), to accept them or to transfer them to others. It must be taken into account that the treatment of the risks may give way to secondary risks and imply additional costs in terms of time and performance; accordingly, the right option must be considered on a case-by-case basis.

The output of the determination and assessment of the risks and the specification of the preventive measures and the mechanisms of control is thus stipulated:

Activity/functional profile	Identification of the risks	PO	FI	GR	Preventive measures	Mechanisms of control
aaa	bbb	#	#	A	yyy	zzz

## 2. Control and monitoring of the Plan

1. The follow-up and monitoring of the implementation of the preventive measures must be made *every six months*. A report will be made and transmitted to the IG at the end of June and December of each year.

The *report* will at least contain, considering the previous report: (i) changes to the referral (legal and organisational) and control environments; (ii) description of the risks that were eliminated or whose impact was reduced, as well as those that still exist; (iii) identification of the measures that have been adopted and those that must be adopted; (iv) clarification of the risks identified during that year that have not been considered in the initial Plan; (v) reference to the management of conflicts of interests.

2. This Plan will be reviewed and updated whenever necessary and, mandatorily, during the first three months of 2018.

3. The IG will designate, for two periods of six months, from the personnel belonging to the inspective and technical areas, the persons who will be responsible for monitoring the Plan and submit to decision the corresponding reports.

## IV. MEASURES FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED OFFENCES

ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
Representation of the organisation and interaction with the external environment.	Violation of operational duties and ethical principles.  Excesses of representation of the organisation or absence of mandate.	2	3	A	Mandatory and prompt communication to the Executive Board whenever there is a suspicion that any occurrence may appear to be a lack of exemption or of correct conduct.  Bar from receiving gifts, except those allowed by practices and standards of social behaviour.	Registration of each item given by IGAI as a gift (institutional gifts) and acceptance, without any kind of return, of goods or services received as gifts in the exercise of functions.  Clear mention of the name of the person or persons who will represent IGAI in contacts with external entities.  Written confirmation, by the Executive Board, of the position taken by IGAI in informal meetings and its communication to the concerned external entity.
International relations.	Non-conformity in promoting and defending the institutional image of the organisation.	1	3	A	Early and documented study of the topics to be discussed.  Grant of privileged share of information and experience with counterparts and cooperation with PALOPs.	Timing / schedule of events.  Final reports of the events, to be sent to the Ministry of Home Affairs with information to the FSS and other services under the authority of MAI.
Execution of contracted functions or positions subject to appointment.	Inadequacy of the technical and behavioural profile.  Contamination of demotivation.	1	2	C	Stimulation to share knowledge and technical information and exchange of experiences.  Adequacy of training to the required profile.  Promotion of teamwork.  Actions of individual motivation.	Registration of technical skills of workers (documented or merely declared).  Training program.  Immediate constitution of work teams after approval of the Plan of Activities.  Definition of weekly periods of up to 3.5 hours for the development of personal and social skills in the context of labour or voluntary work.

ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
	<p>Breach of functional duties and ethical principles.</p> <p>Occurrence of conflicts of interest.</p>	2	3	A	<p>Permanent availability on the Internet and on the Intranet of the mission, vision and values of the body.</p> <p>Individual declaration on the non-existence of a conflict of interests or impediments, to be signed at the beginning of functions.</p> <p>Mandatory request for authorization for the accumulation of public or private functions, giving priority to the corresponding decision-making proceedings.</p> <p>Mandatory and immediate communication to the Executive Board, if necessary with the presentation of an exemption request, whenever any occurrence reasonably presupposes that the impartiality or rectitude of the conduct may be the object of suspicion.</p> <p>Access and follow-up of the proceedings by the Executive Board, in its various phases.</p> <p>Preference for collegial harmony in the inspection actions (rotation of personnel in “field actions” and inspection visits).</p>	<p>Training and awareness actions regarding the ethical dimension (mission, values, vision).</p> <p>Aggregation in a single procedure (PGAB) of declarations of non-existence of conflicts and accumulation of functions.</p> <p>Registration, to be presented to the Executive Board, of the state of execution of the proceedings, in accordance with their different phases and the effective ascription of working times.</p> <p>Inspection reports.</p>
	Accumulation of functions and responsibilities.	2	2	B	<p>Definition of profiles of competences.</p> <p>Delimitation of responsibilities related to functions.</p>	Description of procedures of production and responsibilities involved.
	Lack of follow-up of the recommendations point out in the report, after the approval by the corresponding member of the government.	2	2	B	<p>Definition of deadlines for the performance of follow-up actions.</p> <p>Insertion of follow-up actions in the Plan of Activities.</p>	<p>Regulations of the inspection activity.</p> <p>Reports of the follow-up actions.</p> <p>Questionnaire of follow-up addressed to the bodies and services subject to inspections or audits.</p>

ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
Procedural decision and technical preparation of the decision.	High discretionary selection regarding the proceedings waiting for a decision.	1	2	C	Regulations for the distribution of proceedings. Essential involvement of high technical support regarding proposals that may have external effects or visibility. Ulterior analysis of the content of the decisions. Creation and maintenance of the registration of the proceedings in computer programs.	Scales of distribution of the proceedings. Hierarchic validation of the proposals of decision. Studies to consolidate the principles of IGAI.
	Technical inconsistencies or irregularities when making proposals of decision and reports that contain recommendations.	2	3	C	Routine training programs and technical update. Intensive maintenance of the resources and tools of technical nature.	Training program. Consolidation of legislative sources, case law and doctrine in databases of common access. A piece by piece list, permanently updated, of legislative referrals. Template of the most relevant or more frequently used documents.
Reception and relationship with third parties/citizens.	Provision of unsuitable information. Lack of interest for the specific case.	2	2	B	Definition of the levels of responsibility. Training regarding conduct at the reception desk.	Use of standard forms to receive complaints and grievances. Satisfaction surveys at least twice a year.
Management of complaints, allegations and grievances and of certificates or extracts of documents with sensitive information.	Leak of information, violation of secrecy, breach of confidentiality or undue use of sensitive information.	2	3	A	Immediate brief assessment of the complaints, allegations and grievances. Priority forwarding of certificates or extracts of documents relating to proceedings which have a sanctioning nature. Classification of documents according to the permissions of access. Regulations of the means and ways of entry and circulation of paperwork and communications, in paper or electronic support.	Register of access to information. Nomination of the persons who are responsible for the circulation of documents.

ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
Keeping, preservation and elimination of documents and equipment.	Loss, theft or misplace of documents and equipment or their destruction. Deterioration of the documents and equipment due to natural causes.	1	3	A	Progressive digitalisation of documental <i>acquis</i> . Regular actions to verify the compliance with the implementation of the applicable norms. Control of environmental levels (temperature, humidity). Routines of periodic cleaning of the facilities where documents are kept.	Registrations or minutes of removal or elimination. Chart of periodic verification of environmental factors. Audits to the proceedings of safeguard and maintenance, made by the Executive Board.
Technical and administrative support to the Executive Board of IGAI.	Decrease of the quality of the information provided and of the technical and administrative support, for purposes of decision-making.	2	2	B	Scrutiny of the final information at middle level management. Analysis and continuous adjustment of the performance of the legal proceedings and of those established in the internal control system.	Internal thematic audits.
Combined work among the administrative support, the technical and the inspective areas.	Failure or inopportunity to provide mutual support or information.	2	2	B	Definition of contact points of the areas, in accordance with job proceedings (when there is no middle level management for that purpose). Rules establishing mandatory ways of communication. Regular meetings for planning and follow-up of activities.	Regulations of organisation and discipline of work. Schedule of meetings and written specifications of on-going short-term actions.
Implementation of directives and audit rules (both national and international).	Failures of uniformity in the implementation of audit rules and technics.	2	2	B	Digitalisation of the proceedings. Establishment of internal directives regarding methods and technics of audit.	Auxiliary guidelines for audits. Control in the remit of thematic audits/inspections and inquiries, in accordance with recommendations of the Executive Board.
Writing of reports of inspective remit.	Decrease of the quality of the analysis and the recommendations.	2	2	B	Combined mechanisms of collection and stabilisation of evidences and other support elements ("papers"). Interdisciplinary establishment of the elements that constitute the inspective teams. Creation of a database of experts. Permanent monitoring, by the Executive Board, of the	Standard requests of production of documents, institutional collaboration and nomination of experts. Nomination of a rapporteur for each proceeding. Registers of the state of execution of the

ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
					state of execution of the proceedings.	proceedings.
Support to planning.	Inopportunity. Flaws in the control of the planning instruments.	2	2	B	Permanent definition of mandatory deadlines for collecting elements (scheduling). Appointment of representatives of the technical and administrative support areas. Periodic meetings between the Executive Board and the representatives of those areas.	Tests and cross-checking of information. Scheduling of meetings and written specification of conclusions.
Follow-up and report of management risks.	Failure to perform the follow-up and report of execution of the PPRCIC.	2	1	C	Monitoring of the PPRCIC. Nomination of members of the staff responsible for the monitoring.	Reports of monitoring of the PPRCIC. Report to the Executive Board of new situations susceptible of being classified as a high serious risk.
Management of the training program.	Non-existence of a policy for the training of staff. Low level of execution of the training program.	1	1	C	Elaboration of an annual training program, with the intervention of representatives of the areas. Designation of the responsible person to look for available training programs. Evaluation of training proceedings. Creation of thematic acquis of written or multimedia material.	Registration of qualifications awarded to workers. Standard reports to be filled out by employees involved in training programs. Internal dissemination of material and of the reports prepared by trainees.
Production of accounting information.	Disturbance of the quality of presenting and auditing of accounts.	2	2	B	Register of flows by expense groups.	Intermediate and final information conferences and computer records and postings. Internal audits.
Remuneration processing.	Errors in the determination of fixed and variable remunerations.	2	1	C	Registers of supplementary work and facts that generate the right to the perception of allowances and grants. Internal publicity of the types of grants and allowances paid by the organisation and the corresponding	Relevant decisions for work management (external journeys, overtime work, recognition of the right to receive allowances or grants, etc.). Intermediate and final information conferences and computer records and



ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
					number of beneficiaries.	postings.
Acquisition of goods and services.	Decrease in the quality of the services.  Unsuitability of the good or service to the needs or interests of the organisation.	2	2	B	Monitoring of the proper execution of the contracts entered into and the exercise of legal and contractual guarantees.  Permanent and phased survey of acquisition needs.  Routine review of referential of suppliers.  Explanation to suppliers of satisfaction level.	Designation of the person responsible for monitoring the quality of services provided and goods purchased.  Intermediate and final information conferences.  Reports specifying acquisition needs.  (Note: Functions shared with the Secretariat General of the MAI, in particular with regard to procedures of acquisition not carried out by direct agreement.)
	Failures in the acquisition and licensing of software and in the acquisition, development and maintenance of technological infrastructures.	1	2	B	Documented acquisition and maintenance procedures applied throughout the organisation.  Creation, maintenance and evaluation of models of technologies to be acquired which ensure the necessary requirements for the continuity of the specific activities of the organisation.  Implementation of reliable and fast procedures regarding the installation, update and monitoring of software.  Regular check of the computer equipment and software infrastructure.  Lifecycle management for the selection, acquisition, maintenance and disposal of the technological infrastructure.	(Note: shared with the RNSI.)
Recruitment and selection of personnel.	Breach of duties of transparency, independence and impartiality.	1	3	A	Collegial decision making.  Rotation of the members of the personnel appointed for the composition of juries.	Juries consisting of at least 3 elements.  Objective, unbiased and independent evaluation during the entire procedure.

ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
	<p>Discretionary or preferential treatment of candidates.</p> <p>Intervention in the procedure when there is a situation of inhibition/conflict of interests.</p> <p>Use of preferential criteria with little objectivity.</p>				<p>Conformity of the selection methods to the job profile, favouring, whenever possible, the written test of specific knowledge about the position.</p> <p>Specific recruitment rules for the “Special Oversight and Control Body”.</p> <p>Definition of objective and precise criteria regarding the intended profile of skills.</p> <p>Declaration of non-existence of conflicts of interests.</p> <p>Grounded decisions on each stage of the recruitment procedure.</p>	<p>Minutes elaborated by the jury.</p> <p>Register of free consultation and grouping in a single file of the documents submitted by the candidates.</p> <p>Mechanisms that require the rotation of the members of juries of recruitment procedures.</p> <p>Availability, to the candidates, of access to information concerning the recruitment and selection procedures.</p>
Individual register of workers.	Non-authorised access to information and breach of secrecy.	2	2	B	Specifications of authorisations of access to individual files.	Nomination of member(s) of the staff with access permissions.
	Failures in the registration of information in staff databases.	2	1	C	Specification of permissions of access and registration of data.	Nomination of member(s) of the staff with specific permissions.
Evaluation of workers.	<p>Favourable treatment.</p> <p>Abuse of power.</p> <p>Discretionary authority.</p>	2	2	B	<p>Adoption of measurable and quantitative indicators for the definition of individual objectives.</p> <p>Grounds for the decisions.</p>	System in force for the evaluation of performance.
Structure of information.	<p>Non-development of the structure of information.</p> <p>Low level of execution of the information technology strategic plan.</p>	1	2	B	<p>Planning and adoption of operational plans and definition of short-term objectives.</p> <p>Maintenance of the information model and the technological infrastructure plan of the organisation.</p>	(Note: shared with the RNSI.)
	Lack of suitability of the information control environment.	1	3	A	Review and communication of regulations applicable to information technology, namely regarding the communication of information.	(Note: shared with the RNSI.)

ACTIVITY*	IDENTIFICATION OF THE RISKS	PO	FI	GR	MEASURES OF PREVENTION	MECHANISM OF CONTROL
	Lack of adaptability to external requirements that interfere with information technology.	1	2	B	Regular maintenance and review of the procedures of conformity that determine the implementation of external legal requirements, or of any other nature, regarding practices and control of information technology, by reason of the matter.	(Note: shared with the RNSI.)
Maintenance and support of the technological infrastructure.	Absence of contracts of levels of service in technological areas that dependent on infrastructures.	2	3	A	Continuous definition and revision of levels of services with external entities/suppliers based on requirements of availability, continuity and security.  Monitoring and communication of the vulnerabilities found in the performance of the contracted levels of service.  Use of automatic tools of detection and communication of incidents, in accordance with the contracted levels of service.	(Note: shared with the RNSI and the Secretariat General of MAI.)
	Loss of control over the resources made available by information technology.	2	3	A	Definition of proceedings and use of tools to measure the use and performance of the systems and communications.	Management of the life cycles for the selection, acquisition, maintenance and disposal of the technological infrastructure.
	Loss of control of the physical environment that surrounds and protects the technological resources from incidents (fire, floods, dust, excess of heat and humidity, sudden oscillations of the electric current).	2	2	B	Control, monitoring and correction of the physical location and environmental conditions of the database, in conformity with the rules in force.  Physical access to the database (controlled and restricted).	Physical regular inspections for detection of incidents and control of the environment.  Regular testing of the redundant systems and failures.

(\*)Functions, actions or procedures (cf. No. 2 of the CPC Recommendation of the 1st of July 2015).

## V. RECOMMENDATION

Since the Plan is not only a dynamic instrument and one that is susceptible of review, but also a model and stabilizer of orientations and values, it is necessary to consider a set of actions and decisions that give way or trigger the review and establishment of management vectors that work together for a targeted organisational culture of *values* and *security* - in accordance with the mission, the vision and the strategic options already assumed.

### PROPOSALS

1. A *person in charge* of the respective monitoring for the corresponding six months period reports (*rapporteur*) *for each of the inspection and technical areas* shall be designated when the Plan is approved, in the very Decision IG that approves it and in accordance with the provisions of point III.2.

2. We propose that, in a period of *three working days* after the Decision referred to in point 1, the Plan must be:

- a) Made known to all employees by protocol (with written and signed mention that they took knowledge);
- b) Published in the IGAI Website;
- c) Sent to the CPC (Court of Auditors).

3. We also propose, in a delay of *thirty calendar days* after the Decision referred to in point 1, the formulation, creation or formation of:

- a) An internal training program to raise the awareness of all employees regarding the management of the risks referred to in the Plan and the ethical dimension therein established, whose duration will not exceed three hours in up to two sessions and completed until 28 February 2017;
- b) The internal models of forms for the declaration of non-existence of conflict of interests or impediments and of request for accumulation of functions, to be approved until the end of the training referred to in sub-paragraph a);
- c) A working group consisting of an element of each of the inspection, technical and administrative support areas – one of them immediately nominated as *rapporteur* – that will survey the organisational needs of regulation, elaboration of procedural guides or mere

review of existing instruments; the report, to be submitted to the Executive Board within 30 calendar days, shall contain, in addition to a survey and summary description of the existing instruments, a minimum alignment of proposals to be considered<sup>12</sup>.

4. We propose that, in a delay of three working days after the conclusion of the training action referred to in sub-paragraph a) of point 3, all internal collaborators that are not members of the Executive Board must have filled up and signed an individual form stating the absence of any conflict of interests or inhibitions.

5. Finally, we propose:

- a) The elaboration of regulations on the circulation and procedural treatment of paperwork and communications, in paper or electronic format, since they are susceptible of containing confidential or sensitive information<sup>13</sup>, to be submitted for discussion until 18 April 2017 and to be approved until 28 April 2017;
- b) The reformulation of a form for presenting complaints and the creation of an inquiry form of satisfaction, to be submitted to the Executive Board until 5 May 2017 and make available on the IGAI Website until 15 May 2017;
- c) The review of the Internal Regulations of Organisation and Discipline of Work, to be submitted to discussion until 5 May 2017 and to be approved until 31 September 2017.

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<sup>12</sup> The working group will also consider, in particular, the need to review or create a set of forms or templates that are more relevant or more frequently used (e.g. manual for the reception of new employees), as well as the possible need for formalization of procedures for the systematic control of assets, inventory and stock of office supplies.

<sup>13</sup> Namely complaints, reports of alleged illegalities and grievances that contain personal data, as well as certificates and documental extracts of proceedings that may lead to the imposition of a punishing measure. The regulations will make a specific reference to the means and ways of reception, internal circulation and forwarding, as well as a definition of the persons who are responsible for the proceedings therein mentioned.