

# GROUP OF STATES AGAINST CORRUPTION (GRECO)

Anti-corruption trends,  
challenges and good practices  
in Europe & the United States of America



The development of integrity policies in Europe – evidence about effectiveness

Featured essay:  
Christoph Demmke

**Anti-corruption body  
of the Council of Europe**

24th General Activity Report (2023)



Group of States against Corruption  
Groupe d'États contre la corruption

COUNCIL OF EUROPE



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# 24<sup>th</sup> General Activity Report (2023)

of the Group of States against  
Corruption (GRECO)

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challenges and good practices  
in Europe & the United States of America

Adopted by GRECO  
(March 2024)

Featured article:

**The development of integrity policies in Europe –  
evidence about effectiveness**

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French edition:  
*24<sup>e</sup> Rapport général d'activités (2023)*  
*du Groupe d'Etats contre la Corruption*

[www.coe.int/greco](http://www.coe.int/greco)

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Cover design and layout:  
Documents and Publications Production  
Department (SPDP), Council of Europe

Cover photo/image: ©Shutterstock  
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Printed at the Council of Europe

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## INTRODUCTION BY THE PRESIDENT OF GRECO

*Marin MRCELA, Justice of the Supreme Court of Croatia*

**A**s in previous years, this Activity Report provides an account of the state of corruption 2023 as observed through GRECO's monitoring of its member states. The Report highlights the main trends drawn from GRECO's evaluations and recommendations and identifies examples of good practices. It also presents a snapshot of progress made by member states by the end of 2023 within GRECO's procedures.

Looking back at 2023, the current global context is deeply challenging, considering the confluence of crises impacting countries in Europe and the wider world. One cannot underestimate the effects of the ongoing recovery of economies from a years-long pandemic, inflation coupled with a prospect of slow economic growth in many member states, the democratic backsliding observed, the continued Russian Federation's war of aggression against Ukraine and its people, to name just a few. In such difficult times, corruption, if thriving, can only hinder economic development, hamper or reduce the effectiveness of policy responses, erode trust in public institutions, and have a negative impact on individuals' enjoyment of human rights.

In Reykjavik, on 16 and 17 May 2023, the Council of Europe's Heads of State and Government reaffirmed their "common responsibility to fight autocratic tendencies and growing threats to human rights, democracy and the rule of law". Corruption is among these major threats for the core values which unify European States. When the authorities entrusted with decision-making power (be them within the executive, legislative or judicial power, at the national or local level) are no longer guided by the public interest, but by private interests, this leaves room for an arbitrary use of power. Corruption is an insidious and, unfortunately, too widespread evil which erodes the confidence of populations in their democratic institutions. Therefore, in the Reykjavik Principles for Democracy, the European leaders committed to "a relentless fight against corruption, including through prevention, and by holding accountable those exercising public power."

At such times, it is more important than ever to remain steadfast in our anti-corruption commitments, and work together to effectively prevent and fight corruption. GRECO constitutes a concrete mechanism for ensuring the effective and ongoing implementation of the Council of Europe's standards against corruption, thereby playing a unique role to safeguard and strengthen our democracies.

To fulfil its mission, GRECO has continued monitoring its 48 member states under its 5<sup>th</sup> Evaluation Round on preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies. We expect the evaluation visits under this Round to be completed in 2024 with the exception of Ukraine for the time being, and Kazakhstan, our most recent member that will be evaluated in the 3<sup>rd</sup> Evaluation Round in 2024. In 2023, GRECO carried out eight evaluation visits and adopted eight evaluation reports and 31 compliance reports (including 21 within the framework of the 4<sup>th</sup> Evaluation Round aimed at parliamentarians, judges and prosecutors).

Thanks to GRECO's evaluation and compliance process, a continuous peer-based dialogue about how to best prevent and combat corruption is effectively and efficiently guaranteed. Through the execution of the monitoring work, and the engagement of the national delegates in GRECO, the vast majority of our member states remains highly committed to implementing the recommended reforms. GRECO's reports are in almost all cases speedily made public, which is an essential and very positive factor for success, as transparency remains the first step towards change.

However, considering the threat that corruption poses to the proper functioning of our democracies, GRECO cannot allow itself to become too complacent. More must be done by our member states to ensure that GRECO's recommendations are quickly, fully and satisfactorily implemented. The need for further improvements when developing integrity policies, particularly in order to ensure their effectiveness, is analysed in detail in the present report. Compliance within the 4<sup>th</sup> Evaluation Round continues to be the lowest when it comes to parliamentarians. And several judicial systems must be further reformed to guarantee full independence and strengthen the integrity rules applied to judges and prosecutors.

As regards the 5<sup>th</sup> Evaluation Round, GRECO's findings show that transparency, oversight, and accountability remain at stake when it comes to preventing and addressing corruption. There is no transparency without accountability, as impunity only exacerbates the risk of corruption and undermines public trust. Our practice has highlighted the need for more regulation and increased rigour in the engagement within the highest executive functions, in particular as regards contacts with third parties and lobbyists. More generally, GRECO considers that States should ensure that their institutional and legislative integrity frameworks apply fully and directly not only to high-level civil servants but also to ministers, their political advisers or other politically appointed persons, and even, depending on the constitutional systems, to certain Heads of State. Similarly, as regards law enforcement agencies (police and/or gendarmerie forces), more should also be done to ensure that corrupt behaviour and integrity failings are properly addressed at all levels within the hierarchy, and that undue interference of the governmental power within the policing activities is effectively prevented.

The implementation of GRECO's recommendations is ultimately decisive for any real progress. As recalled by the Reykjavik Summit, *"our European democracies are not established once and for all"*. Therefore *"we need to strive to uphold them each and every day, continuously, in all parts of our continent"*. This is also part of GRECO's fundamental mission.

In this spirit, and because corruption can lead to significant violations of human rights, GRECO is a full partner of the human rights protection mechanisms. That is yet another reason why GRECO's role in preventing corruption and promoting the integrity of institutions and individuals is key. Throughout its five evaluation rounds, GRECO has followed closely the case-law of the European Court of Human Rights as it relates to its work and mandate, which is cited in the context of a number of recommendations addressed to member states. The general principles deriving from the evolving case-law have also been central to GRECO's assessments of member states' compliance with these recommendations. Noteworthy judgments have covered issues such as the exposure of the judiciary to interference by the executive and legislature and the importance of having independent and impartial judicial councils, the protection of whistleblowers, vetting proceedings for judges, access to public interest information, and the publication of personal data for failure to fulfil tax obligations, to mention a few. I am very pleased to note the positive trend of GRECO's reports and the Criminal Law Convention on Corruption featuring more prominently in a number of landmark judgments delivered by the Court since 2022. The Secretariat also takes active part in a cooperation project set up between the Court's Registry and the Council of Europe's monitoring bodies in order to exchange information and raise awareness about each other's work and findings.

Instilling a mentality of zero tolerance of corruption, and developing among public and private authorities a strong behaviour of integrity, require that a common culture is built both at domestic and international levels. In this field, national, European and international institutions must speak the same and clear language. Successful anti-corruption efforts must feature a broad coalition of leaders, both inside and outside of government, and the concerted efforts of a unified pan-European, working together. GRECO's reports and recommendations feature strongly both in the European Commission Rule of Law Report and in the Council of Europe's annual

Report on the State of Democracy, Human Rights and the Rule of Law in Europe, and I am grateful for their leaders' efforts to support the implementation of GRECO's recommendations at the highest level. In its Joint Communication on the Fight against Corruption of 3 May 2023, the European Commission committed to continue discussing the possibility of moving toward full participation of the EU in GRECO. Looking ahead, the EU should make speedier progress towards full membership in GRECO. This is a much-needed step for Europe and its citizens that GRECO would welcome.

GRECO attaches also great relevance to ensuring cooperation and synergies with the other international anti-corruption monitoring bodies. This is the case as regards the United Nations, notably the UNODC, and the Organisation for Economic Co-operation and Development (OECD), in particular its Working Group on Bribery in International Business Transactions and its Working Party of Senior Public Integrity Officials (SPIO). They both have developed anti-corruption standards which are aligned with the objectives of the Council of Europe's standards. GRECO also cooperates with the Organization of American States (OAS). All these organisations have observer status with GRECO, and vice-versa. GRECO also takes part in the work of the G20 Anti-Corruption Working Group, and is actively represented in the work of the multi-stakeholder platform which has become the International Partnership Against Corruption in Sport (IPACS). We cooperate within the boundaries of our respective mandates, and our Secretariats meet regularly to coordinate, exchange information, and organise joint events where possible.

I am particularly grateful to the Statutory Committee for its continuous support to GRECO's work. There is no effective fight against corruption without adequate resources, which in turn, demonstrate the political will and commitment to tackle corruption. I would also like to thank Belgium for their voluntary contribution in support for the implementation of GRECO's Programmes of Activities, which enabled it to contribute to synergy efforts in the wider anti-corruption landscape. As allowed by GRECO's Statute, I would also welcome any additional voluntary contributions to further support the implementation of GRECO's programme of activities.

The Rule of Law is never settled for good, there is always room for further progress when it comes to implementing Council of Europe standards and GRECO recommendations. As GRECO celebrates its 25th anniversary in 2024, it must continue to question itself about the methods by which it can remain effective, and not be afraid to tackle challenges that may appear difficult to overcome. This is why I am particularly pleased to see GRECO breaking ground, once again, as it has decided to devote its 6<sup>th</sup> Evaluation Round, which will be launched in 2025, to preventing corruption and promoting integrity at the sub-national level.

Rest assured that GRECO will continue to promote the application, in Europe and beyond, of the highest standards of integrity, for the sake of the Rule of Law and the future of our societies. We count on the support of all our member states and their representatives, as well as on our partner institutions, agencies, observer organisations and experts, and express to them our warm appreciation in this respect.





GRECO Plenary Meeting



Annual meeting of the International Partnership against Corruption in Sport (IPACS)



10th Annual Meeting of the Secretary General with the Heads of the Monitoring and Advisory Bodies of the Council of Europe



Exchange of views with the President of the European Court of Human Rights



On-site visit – Andorra



In Strasbourg for the Evaluation of Cyprus



On-site visit – Armenia



General Activity Report – press launch, Brussels

# KEY FINDINGS

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**G**RECO's evaluation work continued at full pace in 2023. GRECO carried out eight evaluation visits during the year and adopted eight evaluation reports and 31 compliance reports, including one compliance report incorporating the related follow-up to a Rule 34 report. The information set out below about GRECO's findings is based on the reports made public in 2023.

## 4<sup>th</sup> Round – Prevention of corruption in respect of members of parliament, judges and prosecutors

In 2023, GRECO adopted 21 compliance and *interim* compliance reports concerning the 4<sup>th</sup> Round dealing with the prevention of corruption in respect of members of parliament, judges, and prosecutors. In the same year, eighteen compliance or *interim* compliance reports were made public following authorisation by the member states' national authorities.

**Overall, progress in the implementation of GRECO's 4<sup>th</sup> Round recommendations has been slower than expected.** The 18 compliance reports made public in 2023 showed levels of compliance that were globally unsatisfactory in 8 cases (44%), an exit from the non-compliance procedure in 4 cases and the closure of the 4<sup>th</sup> Round compliance procedure in 4 cases. In 2 cases, GRECO asked for further information to be provided on the implementation of recommendations not fully implemented. It is concerning to note that in some of the non-compliant member states, the reform process lasted in the range of 7 to 11 years from the time of adoption of their respective evaluation reports.

**Limited progress is observed with respect to the introduction or application of codes of conduct for members of parliament.** In some member states, codes of conduct were adopted (which include monitoring and enforcement provisions) and in others, their adoption was under discussion. At the same time, there are still a number of member states which have not yet taken any action in this respect, despite receiving already several years ago a recommendation to that effect. It is positively noted that some political parties or governments have clearly stated their intention to adopt such codes. At the same time, evidence points to the fact that several member states where such codes were already adopted have yet to demonstrate having taken additional measures for their effective implementation and enforcement in practice, including by setting-up and applying a mechanism to sanction breaches by MPs.

**Clear progress is observed as regards actions taken to ensure transparency of the legislative process, the publication of draft legislation and the practice of public consultations.** Member states have made notable efforts in ensuring openness at all stages of the law-making process, striving to allow for a meaningful public participation in legislative initiatives. Some developments were also seen in the member states' intention to ensure the timely update of the respective parliaments' websites with relevant information on draft legislation as well as making sure that the working documents are accessible to the public.

**Further action is required to ensure the transparency of asset declaration systems for members of parliament and their adequate monitoring.** Virtually all GRECO members now require their members of parliament to disclose their assets. However, there is still room for improvement regarding the level of detail required (including quantitative information), and public accessibility to data. Moreover, the development of effective verification and enforcement systems remains a key challenge in this area. On a positive note, some countries are taking steps towards increasing resources and specialisation of the bodies tasked with monitoring financial declarations, as well as streamlining their action by, among others, introducing red-flag systems, establishing random checks of high-risk functions/sectors, interconnecting databases, introducing e-filing to render cross-checks more efficient, etc.

**Regulations on lobbying have yet to be introduced or to be effectively implemented.** Member states are gradually introducing legislation on lobbying through registration and reporting obligations of lobbyists. This is a positive development, which, however, has not yet materialised in all GRECO members. Given that lobbying is a growing and topical phenomenon, it is important that rules are in place to provide transparency in respect of lobbyists and the actions taken by them in order to safeguard the integrity of the public decision-making process. Furthermore, once rules are in place, it is critical that they are coupled with adequate mechanisms for effective implementation, compliance and review. It is also essential that the other side of the lobbying equation, i.e., members of parliament, are provided clear guidance on how to engage with lobbyists and the expected conduct of behaviour.

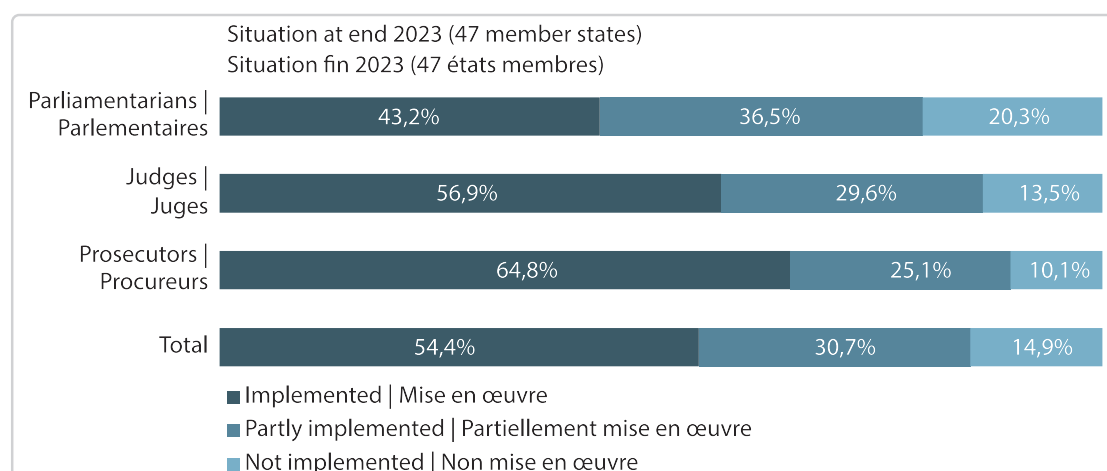
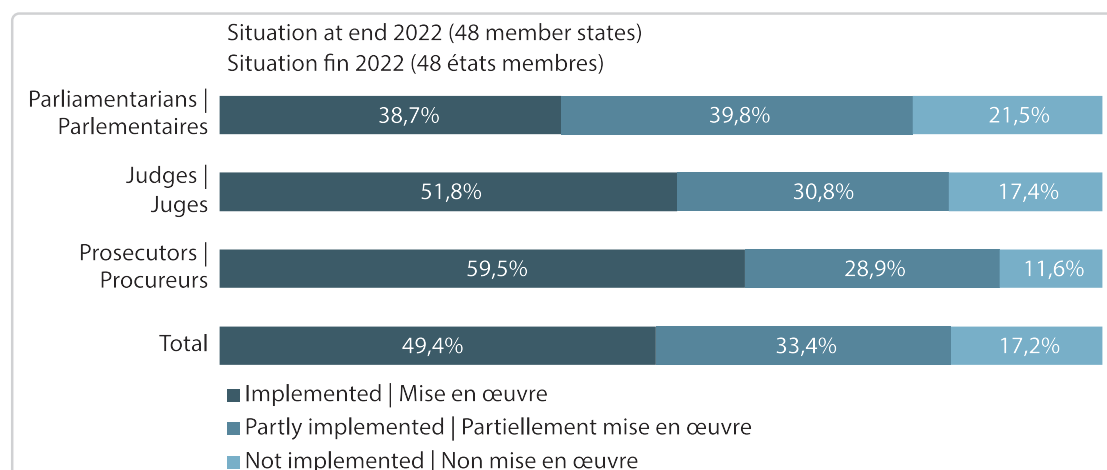
A considerable increase is noted in the level of awareness regarding ethical issues for judges and prosecutors, resulting from the adoption of codes of conduct and dedicated training. Many member states have adopted codes or guidelines for judges and prosecutors on corruption risks and ethical behaviour. They have also introduced dedicated training on such standards of integrity which is often mandatory.

There is insufficient progress with respect to ensuring the independence of judicial councils from the legislative and/or executive powers. Only a few member states among those invited to do so have established objective criteria for the election of judges and lay members to judicial councils to ensure their independence from political influence or interference. In some cases, for instance, parliaments and/or governments still control the pre-vetting process of candidates or directly elect them as members.

Continued role and influence of the executive on the judiciary. The implementation of transparent and objective criteria for judges' and prosecutors' recruitment, promotion and performance evaluation as well as disciplinary measures have yet to be observed. This concerns court presidents and vice-presidents, ranging from tribunals to national supreme courts, whose appointment or dismissal continues to be largely influenced by government, notably ministers of justice. Non-transparent requirements for promotion, arbitrary transfer, and influence from the executive branch in disciplinary procedures remain widespread.

Figure 1 – Implementation of 4<sup>th</sup> Round recommendations by GRECO member states 2022-2023

Readers should bear in mind that the member states are at different stages of GRECO's procedure for the round and that the duration of a monitoring procedure varies – from the baseline evaluation report through the compliance procedure until the closing of the round in respect of each state. The statistics take account of all compliance reports made public by the end of 2022 or 2023, respectively.<sup>1</sup>



1. At end 2023, the following countries were in the non-compliance procedure under the 4th Round (application of Rule 32): Austria, Bosnia and Herzegovina, Czechia, Denmark, Republic of Moldova, Poland (inc. Rule 34 follow-up), Portugal and Türkiye.

## 5<sup>th</sup> Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

GRECO's 5<sup>th</sup> Evaluation Round deals with two categories: persons with top executive functions (PTEFs), and law enforcement agencies (LEAs). The two groups selected by GRECO are different in scope and powers, yet their ability to maintain and demonstrate integrity, as well as their capacity to cope with their internal corruption-related risks, are vital for the proper functioning of democracies based on the fundamental values of the rule of law and the protection of human rights.

In 2023, GRECO adopted 8 evaluation reports and 10 compliance reports concerning the 5<sup>th</sup> Round. In the same year, 20 reports (8 evaluation reports and 12 compliance reports) were made public following authorisation by the member states' national authorities.

**The implementation of GRECO's recommendations concerning the 5<sup>th</sup> Round has generally been insufficient.** The 12 compliance reports made public in 2023 showed levels of compliance that were not sufficient in 10 cases (75%) and the member states concerned were asked to provide updates on progress with the implementation of recommendations for further monitoring. In the 2 other cases, the 5<sup>th</sup> Round compliance procedure was closed. Even if some positive patterns were observed, mostly concerning law enforcement agencies, important steps have still not been taken with respect to PTEFs.

### PERSONS WITH TOP EXECUTIVE FUNCTIONS (PTEFs)

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**Setting the proper tone should start with those in top executive functions who should lead by example when it comes to integrity.** Irrespective of differences in the form of government and traditions, GRECO focused on the following major topics:

- ▶ Anticorruption and integrity policy, regulatory and institutional framework
- ▶ Transparency and oversight of executive activities of central government
- ▶ Conflicts of interest
- ▶ Prohibition or restriction of certain activities
- ▶ Declaration of assets, income, liabilities and interests
- ▶ Accountability and enforcement mechanisms

#### Anticorruption and integrity policy, regulatory and institutional framework

**Several countries were urged to either adopt new codes of conduct for PTEFs or revise existing ones, with a focus on providing clear guidance on conflicts of interest.** Where integrity frameworks were present, GRECO urged that they should be reviewed, in order to enhance their clarity, coherence and comprehensiveness. It is however positively noted that several member states have introduced codes of conduct or reviewed the existing ones.

**PTEFs and political advisors should be included in existing integrity policies.** This involves analysing and mitigating the risks faced by this particular category as well as establishing monitoring and compliance measures. Political advisors should be also given particular attention as a group of individuals often operating in a grey area and with a substantial political role and influence in decision-making processes. This means publicly identifying them and clearly regulating their legal status, recruitment, responsibilities and obligations, together with aligning their transparency and integrity requirements with the unique nature of their roles, mirroring those applied to other PTEFs.

**Mechanisms are required to promote and raise awareness on integrity matters among PTEFs.** Integrity training at regular intervals are crucial in order to raise awareness among PTEFs, together with establishing dedicated confidential counselling to provide them with advice on integrity, conflicts of interest and corruption prevention.

#### Transparency and oversight of executive activities of central government

**GRECO recommended to address the absence of rules and guidance for PTEFs in their interactions with lobbyists and third parties influencing public decision-making.** The focus should be on ensuring transparency, disclosure of such contacts and interactions related to their official roles. Even if some measures are underway to enhance transparency on contacts with lobbyists, few tangible outcomes have been observed so far.

**Transparency in the law-making process is another area of concern.** GRECO emphasised the principle of transparency in public documents, limiting exceptions to the minimum, and making outcomes of public participation procedures publicly available. Public scrutiny is essential especially in areas such as public procurement and even more so for large contracts.

**GRECO remained concerned about the discretionary nature of what is made public and the application of Freedom of Information Acts (FoIA).** GRECO noted that some agencies were reluctant to disclose information and preferred to apply exceptions, so it urged to consistently apply the FoIA across government entities. GRECO also reminded countries of the [Committee of Ministers Recommendation Rec\(2002\)2 on Access to Official Documents](#), which provides *inter alia* that limitations to the right of access to official documents must be necessary in a democratic society, proportionate, and only applied if there is not an overriding interest in disclosure.

**GRECO highlighted the importance of stakeholder engagement in policy and regulatory development and emphasised the need for a legislative footprint mechanism for transparency.** Public consultation procedures often have implementation flaws, with discrepancies between legislation and practice especially in meeting consultation timeframes and feedback processes. Contributions to draft laws during public consultation frequently arrive too late, and amendments based on public comments are rare.

## Conflicts of interest

**To prevent corruption, effective management of conflicts of interest is crucial.** GRECO recommended improving the handling of conflicts of interest, both regular and *ad hoc*, by clearly defining applicable rules and procedures. It suggested introducing *ad hoc* disclosure requirements for PTEFs (including political advisors) and stressed the importance of complementing them with advisory and monitoring mechanisms.

**GRECO noted also an increase in mapping risks faced by PTEFs during their mandate.** Many member states carried out integrity-risk assessments and regular impact evaluations of measures in their central governments, as recommended by GRECO. However, further steps need to be taken to adopt a more holistic approach and ensure that the focus of risk assessments is not limited to conflicts of interest and includes responsive and efficient advisory, monitoring and compliance measures.

## Prohibition or restriction of certain activities

**Many countries were advised to clarify the types of secondary activities allowed for PTEFs and establish rules for notification or permission.** GRECO stressed the importance of strict limits on gifts and benefits to prevent improper relations developing between politicians and businesses.

**Countries were urged to address concerns related to the movement of PTEFs between the public and private sectors, known as “revolving doors”.** General guidelines were recommended to manage conflicts of interest when individuals transition from private to public roles or when top executive officials seek new positions outside government service before leaving their current roles. Cooling-off periods, often of two years, were suggested to mitigate conflicts of interest, with the emphasis being placed on their effectiveness rather than the specific duration.

## Declarations of assets, income, liabilities and interests

**A number of deficiencies remain with regard to disclosure obligations.** These concern the scope of persons covered by this requirement, the timely publication of declarations and, most importantly, independent and systematic monitoring as well as substantive oversight. Most countries evaluated were advised to consider expanding the scope of interest declarations to include information about spouses and dependent family members, on the understanding that this information might not necessarily be made public. GRECO also suggested establishing or improving a formal review system for PTEFs’ declarations, with enforceable sanctions for failing to submit reports or knowingly providing false information.

## Accountability and enforcement mechanisms

**Enforcement of the codes of conduct should be ensured through effective supervision mechanisms, accompanied by appropriate sanctions.** GRECO noted that often no effective mechanism is in place to monitor PTEFs’ compliance with the integrity standards and some countries relied on the operation of a form

of political responsibility through “naming and shaming”. Instead, GRECO consistently called for sanctions to be adequate, effective, proportionate and dissuasive and called for the development of additional controls.

**Recommendations included strengthening public integrity bodies and equipping law enforcement with the necessary means for investigations.** GRECO highlighted the need to make the outcomes of procedures involving PTEFs known to the public and encouraged law enforcement to proactively investigate suspected offenses by PTEFs based on reasonable suspicion, rather than requiring irrefutable evidence.

**GRECO stressed that immunity should not lead to impunity.** Recommendations were issued to limit immunities in a manner consistent with democratic principles, ensuring they do not hinder the investigation, prosecution, or adjudication of corruption offences, even in cases involving PTEFs. The privileges of PTEFs concerning prosecution for actions outside their official capacity should be restricted, with an emphasis on objective and fair criteria for lifting immunities.

## LAW ENFORCEMENT AGENCIES (LEAs)

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**LEAs have the authority and powers to tackle crime.** Given their authority to enforce the law, law enforcement officers should always be aware that they are bound by high standards of integrity. In respect of law enforcement, GRECO has focused on the following major topics:

- ▶ Anticorruption and integrity policy
- ▶ Recruitment, career, and conditions of service
- ▶ Conflicts of interest
- ▶ Prohibition or restriction of certain activities
- ▶ Declaration of assets, income, liabilities, and interests
- ▶ Oversight and enforcement

### Anti-corruption and integrity policy

**A comprehensive anti-corruption and integrity policy for the police is needed.** This policy should be based on a thorough assessment of risk-prone areas and include regular evaluations. In countries with existing anti-corruption strategies and codes of conduct, GRECO advised supplementing these codes with provisions covering gifts, *ad hoc* conflicts of interest, and interactions with third parties while emphasising the need for strong oversight and enforcement, sometimes with the introduction of sanctions for non-compliance.

**To ensure effective enforcement, GRECO stressed the importance of police personnel understanding and internalising the code of conduct.** In this sense, establishing mechanisms for confidential counselling on ethical dilemmas and providing regular training on corruption prevention, integrity, and conflict of interest is crucial. All these preventive measures should be transparently communicated to the public to enhance trust and support for the police. Several member states have made progress and adopted codes of conduct and mandatory training for the police, resulting in increased awareness of integrity-related matters. Some LEAs have improved their vetting processes, while others have implemented a system to authorise secondary activities for police officers, along with effective monitoring.

**Strong leadership with consistent ethical behaviour is crucial.** Leading by example influences subordinates’ behaviour, professionalism, and organisational culture. Ongoing training for managers is essential to equip them with the tools to lead on ethics, preventing conflicts of interest, and promoting integrity. In this regard, some positive steps were taken to prevent corruption in high-risk positions. For instance, some member states identified high-corruption risk roles within the police and encouraged staff rotation as a preventive measure.

### Recruitment, career and conditions of service

**Law enforcement careers should be based on transparent, merit-based recruitment, promotion, and dismissal.** This should include an objective appeal process and clear criteria for motivating staff. GRECO suggested advertising vacancies within the police force rather than relying on transfers from the civil service and emphasised the importance of objective selection criteria to prevent undue influence. The need for security checks at regular intervals to account for changing personal circumstances that might increase corruption risks was also highlighted.

**Gender equality should be ensured in the police sector.** While some member states have made efforts to enhance gender balance, disparities still exist, particularly during the recruitment process.

## Organisation and accountability

**Adequate resources are needed to ensure that law enforcement agencies perform in an effective way.** GRECO also emphasised the importance of ensuring appropriate remuneration for police officers and raised concerns when necessary resources and expertise were not provided to support police reforms and internal control systems.

**GRECO found that limited progress had been made in preventing external influences on the police.** GRECO recommended that sufficient operational independence of the Police *vis-à-vis* the political branch be provided for in law and ensured in practice and that the rule should be that individual instructions to the Police are properly documented in writing. To this end, it also suggested creating oversight mechanisms to protect the police's operational independence and freedom from undue political influence. When internal control bodies were set up, they often lacked the resources and authority to perform effectively. GRECO also recommended making the appointment process and careers of senior police managers and the head of the police more transparent and fairer.

## Conflicts of interest

**Fairness and impartiality are crucial for all public officials, with particular significance in law enforcement due to their extensive powers.** GRECO emphasised that law enforcement personnel should take proactive measures to address their own conflicts of interest. In some cases, GRECO recommended a more straightforward and clear approach, with well-defined rules, and oversight for implementation in this regard.

## Prohibition or restriction of certain activities

**A streamlined system to authorise secondary employment or activities with an effective follow-up should be provided for.** In some cases, GRECO advised careful examination of the issue to determine if additional measures were necessary to limit such activities. In general, clear criteria for granting permission should be established and the introduction or tightening of specific mechanisms to prevent and manage conflicts of interest when law enforcement officers leave their force should be considered.

**The practice of “revolving doors” in the public sector poses risks to law enforcement officers’ integrity,** as public officials should not improperly use their position to secure outside employment opportunities.

## Declaration of assets, income, liabilities and interests

**The need for a robust, effective and regular system of declaration for top management and/or certain at-risk positions should be analysed.** GRECO has issued recommendations targeting flaws in such systems, in particular as regards effective oversight.

**Transparency over sponsorship and donations to the police should be increased.** Putting in place safeguards against real, potential, or perceived conflict of interest with regard to such donations is crucial. Sponsorship and donations should be published online, indicating the value, the donor's identity and how the assets donated are spent or used.

## Oversight and enforcement

**Improvements in risk management systems, oversight, and addressing corruption risks in law enforcement remain necessary.** This includes preventing unauthorised access to registers and information leaks and considering measures tested successfully in some countries and which could inspire others, such as using “multiple-eyes” procedures, promoting gender mainstreaming, and rotating staff in corruption-prone areas.

**GRECO raised concerns about the “blue code” (or “wall of silence”), i.e., the informal agreement among law enforcement officers not to report colleagues’ misconduct or offences.** Transparency is crucial for upholding public trust in the functioning of the police authority, and GRECO has issued a few reminders about the obligation for police to report not only corruption, but also integrity-related misconduct.

**The lack of a strong mechanism to protect whistleblowers constitutes a significant weakness in law enforcement agencies.** In countries with such mechanisms in place, GRECO stressed the need to raise awareness

and strengthen them to ensure their use and implementation. There is a continued need to focus on changing police culture and practices to emphasise the importance of whistleblowers. More can be done to promote awareness and change attitudes through intensified training on these matters. To make the system effective, it is essential that whistleblowers trust the mechanism and that they can be adequately protected against retaliation. Further efforts are required, in line with [Recommendation CM/Rec\(2014\)7 of the Committee of Ministers to member States on the protection of whistleblowers](#).

**GRECO highlighted the need for an independent system to investigate public complaints against the police, ensuring objectivity, effectiveness, and transparency.** To this end, some member states have introduced safeguards, including making information on complaints by the public against the police, follow-up, and sanctions publicly available.

### Transparency of party funding

The theme of transparency of party funding (3rd Round) continues to attract significant attention, as a key to accountability and to the trust society places in political life. GRECO's monitoring work has led to wide-ranging legislative and policy changes in member states. In 2023, GRECO continued its follow-up procedure to improve the legal framework in this area and ensure that all its member states now have related legislation, a situation which is in stark contrast to that which prevailed when it started working on this theme in 2007. GRECO also contributed to on-going reflections in other fora, such as the Parliamentary Assembly of the Council of Europe.

### Gender diversity

Gender diversity is key in the prevention of groupthink and in turn of corruption. It is recalled that [Recommendation Rec\(2003\)3 of the Committee of Ministers of the Council of Europe to members states on balanced participation of women and men in political and public decision making](#) establishes that the representation of either women or men in any decision-making body in political or public life should not fall below 40%.

About a third of the questions contained in GRECO's 5th Round questionnaire are gender related. These include requests for statistics on gender representation in the branches of power under review (i.e., central governments and law enforcement) and for criminal/disciplinary statistics by gender. One of the aims is to identify gender imbalances which might potentially lead to, or result from, non-transparent informal networks and decision-making processes. As GRECO has sometimes pointed out in country reports, diversity has the potential of having positive effects on the overall working environment within an institution, making it more representative of the population as a whole.

The challenges lie in raising awareness of the gender dimension in male-dominated workforces such as the police. There is often a genuine lack of realisation that the gender dimension has been omitted and therefore raising awareness is key. GRECO has issued a number of gender-related recommendations during its 5th Evaluation Round, aimed notably at increasing the representation of women at higher levels of law enforcement agencies and ensuring their integration at all levels of those agencies, such as by making diversity a criterion in deployment decisions, and by developing and implementing a gender equality or diversity strategy. GRECO has encouraged its members to think expansively in this domain, so to ensure that merit-based processes include positive policies and practices contributing to an appropriate level of diversity in law enforcement. GRECO has also highlighted the importance of giving adequate consideration to work-life balance measures that would allow women to stay and build a career in the respective organisation.

### Communication

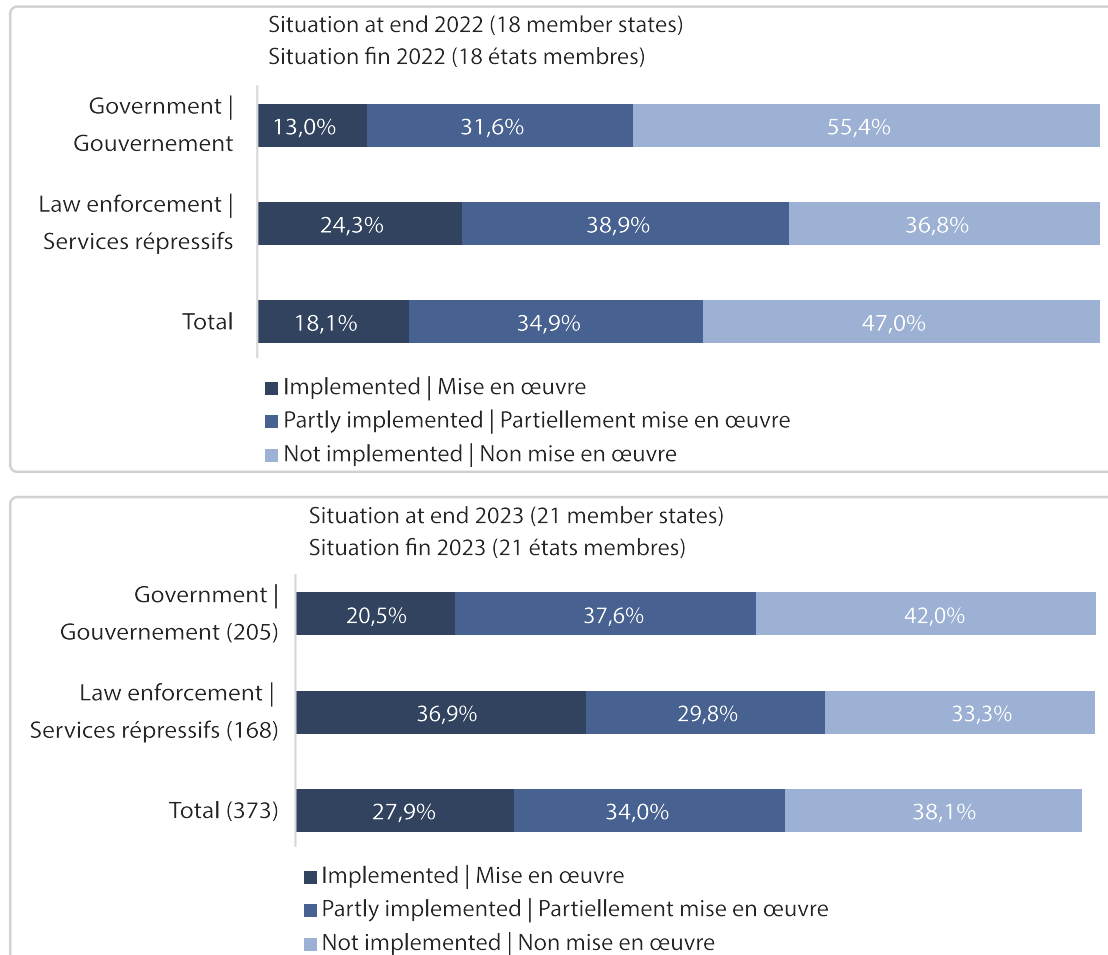
Communication through traditional and social media is embedded in GRECO's work and allows information about GRECO's recommendations in every country to be widely disseminated and debated. GRECO's monitoring receives considerable media attention<sup>2</sup>. Its reports are published with the consent of the country concerned and all GRECO members adopt a practice of authorising publication. GRECO also issues a Newsletter regularly, and its website is widely consulted.

2. See <https://www.coe.int/en/web/greco/greco-in-the-media>



**Figure 2 – Implementation of 5th Round recommendations by GRECO member states 2022-2023**

Readers should bear in mind that the member states are at different stages of GRECO’s procedure for the round and that the duration of a monitoring procedure varies – from the baseline evaluation report through the compliance procedure until the closing of the round in respect of each state. The statistics take account of all compliance reports made public by the end of 2022 or 2023, respectively<sup>3</sup>.



### Selected good practice – examples from various evaluation rounds

#### Declaration of assets – Armenia

A methodology for the verification of declarations of assets has been developed and implemented and several key documents have been produced to help the Corruption Prevention Commission detect financial irregularities in the declarations. A new digital system of declarations has also been launched, which is expected to facilitate the investigation of irregularities.

#### Multi-faceted judicial reform – Luxembourg

A wide-ranging reform of the integrity system for its judiciary has been introduced in response to GRECO’s recommendations in the 4th Round. Following a constitutional reform and the establishment of a national judicial council, the promotion system for judges and prosecutors has been made more objective and transparent. Following a public call for candidates, selection is carried out by the National Judicial Council

3. At end 2023, Denmark, Finland, Iceland, Malta, the Netherlands, North Macedonia, Poland, the Slovak Republic, Slovenia, Spain, Sweden and the United Kingdom were considered not in sufficient compliance with GRECO’s 5th Round recommendations (application of Rule 32 revised).

on the basis of criteria established by law and the opinion of the heads of the relevant courts or prosecutors' offices. Promotion decisions must be motivated and cannot be overturned by the Grand Duke, who is the formal appointing authority. Court and prosecution office managers have been made publicly accountable for the management of their institutions through detailed annual activity reports, and anyone may lodge a complaint to the National Judicial Council in this respect. Finally, the independence of the prosecution service has been enshrined in the Constitution and in law.

### **Integrity requirements for persons with top executive functions – the Netherlands**

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A self-assessment and risk analysis of the integrity of candidate ministers and state secretaries has been developed. The process is based on a list of issues to be discussed during the interview with the government formateur, prior to taking office, and should serve as a tool in identifying potential integrity risks and vulnerabilities.

### **Integrity risk assessment – North Macedonia**

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The State Commission for the Prevention of Corruption (SCPC) prepared a new five-year National Strategy for the Prevention of Corruption and Conflict of Interest, with an Action Plan for its implementation 2021-2025, based on corruption risk assessment, with an analysis of the sectors with the highest risks for corruption and prioritising them for future action. In addition, an integrity system for central government and local self-government units has also been developed. By the end of July 2022, 68 (of 97) entities at central level had adopted risk management strategies and 58 had risk registers in place. Risk management strategies are updated every three years, but are subject to continuous monitoring and, where risks change significantly, to inspections carried out to minimise risks and an update of the strategy takes place at least once a year. Annual plans for corruption risk assessment must be published online. The SCPC has developed a methodology that is intended to serve as a model for all institutions to prepare the aforementioned annual plans. A dedicated Working Group for Corruption Risk Management has been established within the SCPC. The annual plans for corruption risk assessment also include the risks related to all functionaries, personal advisers and external associates. The Public Internal Financial Control Department of the Ministry of Finance also conducted targeted training on risk management in 2021-2022. In cooperation with international experts, a set of simplified guidelines on risk management, analysis of training needs and a training plan have also been prepared.

### **Transparency of decisions in disciplinary cases regarding law enforcement – Portugal**

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The Inspectorate General for Home Affairs started in 2022 to publish online the decisions in disciplinary cases regarding law enforcement officers that were investigated and dealt with by its staff. For the period 2016-2022, this publicity includes abstracts, reports and decisions, duly anonymised, rendered in disciplinary cases. This measure aims to increase awareness of expected behaviour among law enforcement officers and the public.

### **System to detect potential conflict of interests in public procurement – Romania**

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The National Integrity Agency (ANI) has set up an integrated information system – PREVENT – which carries out an ex-ante verification to automatically identify situations that may generate conflicts of interest (detecting family ties and close links between bidders or public procurement procedures and the management of contracting authorities) within the procedures initiated through the Electronic Public Procurement System. When detecting a potential conflict of interest, the system issues an 'integrity warning' which is transmitted to the management of the contracting authority to undertake all the necessary measures to remove the elements that generated the conflict of interest (e.g., replacing evaluation committee members or, in extreme cases, excluding a bidder). Failure to act following an integrity warning or to fill an integrity form gives rise ex officio to a conflict of interest evaluation procedure by ANI.

### **Training for persons with top executive functions– Sweden**

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In addition to on-site in person training activities, a new more extensive training initiative on ethics, conflicts of interest and prevention of corruption targeting persons with top executive functions was made ready for use in 2023. The new course is digital in format and is built around dilemma exercises that are adapted to be relevant for politically appointed staff in the Government Offices. It includes exercises on e.g., conflicts of interest, outside activities and rules on gifts. This e-learning module is accessible to persons with top executive functions at any time before and after regular sessions, the idea being to provide them with the possibility to access the entire module or parts of it at their own convenience.

### **Vetting and re-vetting in the Federal Bureau of Investigation (FBI) – United States of America**

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The FBI has a strict hiring policy. All FBI employees must undergo an FBI background investigation to receive an FBI Top Secret security clearance. Once an applicant receives and accepts a conditional job offer, the FBI will initiate an intensive background investigation. The preliminary employment requirements include a polygraph examination; a test for illegal drug use; credit and records checks; and extensive interviews with former and current colleagues, neighbours, friends, and professors. As for regular vetting, employees are subject to ongoing suitability checks and background investigations to maintain their FBI Top Secret security clearance. This process may include polygraph examinations and random drug tests. Credit checks and interviews of associates, family members, and co-workers, and neighbours may be part of these background investigations. Foreign travel for work and leisure is documented as are regular and ongoing foreign contacts. Financial disclosures are required. Regular ethics training is provided to ensure an understanding of any potential conflict of interest. The FBI's vetting model has moved from periodic vetting (every five years) to continuous vetting (every year) and the implementation of this model strongly leverages technology and data in support of a risk assessment process. The FBI's Insider Threat Office is positioned as an important element of the FBI's efforts to deter, detect, and mitigate against insider threats. Its work not only supports a policy of early intervention, but also contributes to an evidence-based approach to identifying, understanding, and responding strategically to corruption risks. Automation has been central in recent years to be able to identify red flags.

# FEATURED ARTICLE

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## The development of integrity policies in Europe – Evidence about Effectiveness

Christoph DEMMKE, Professor of Public Management  
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**D**uring the past decades, trends have been towards an ethicalisation of law and policies. Ethicalisation means that ever more laws, regulations and administrative provisions refer to ethical requirements and ethical standards. Integrity concepts have also become broader and integrity standards have become stricter. These trends could be characterized as a self-reinforcing and scandal-driven logic that is highly simplistic and change resistant, triggering calls for more and ever stricter laws. Simplistic and change resistant in the sense that it had simply been impossible to call for a deregulation, relaxation or differentiation of integrity policies in certain areas, or – sometimes – to criticize the call for more and stricter laws. Partly, this logic still exists today. The popular narrative is that more, stricter, wider, is the way to go.

Thus, like in many other policy fields, policy and regulatory growth is also a widespread feature of integrity policies and a consequential political development in all countries worldwide. It is the price to pay for upholding democratic values and ethical behaviour in ever more complex societies. Also, integrity policies and ethics management are expanding and becoming more complex. As Anecharico and Jacobs (1996) noted already decades ago: “the public standard of morality has also become much stricter [...]. Previously accepted conduct... is now deemed unethical and previously unethical conduct is now deemed criminal”<sup>4</sup>.

However, trends are not only towards more, and stricter. In fact, the management of integrity policies is becoming increasingly institutionalized, resource-intensive, time-consuming and complex. Overall, one can witness a proliferation of committees, laws, anticorruption bodies, integrity officers and advisors, ethics codes, etc. Unfortunately, this does not mean that integrity policies are also becoming more effective. Generating more evidence of the effectiveness of integrity policies requires additional efforts in the measurement of integrity policies. This is today’s challenge in the field.

Nowadays, the whole field of integrity policies finds itself in a process of re-orientation and innovation. The issue at heart is less whether there is too little, too much or just the right amount of regulation and policy, but rather their effectiveness. It is more important to know whether new integrity policies are supported through capacity-building policies, whether integrity instruments fit with institutional traditions, how to design different policies for different institutions and different categories of holders of public office and how to integrate integrity policies in new governance trends. We also note a growing understanding that the effectiveness of any particular institutional integrity body is determined by the degree and quality of coordination and consistency amongst its constituent elements and the way it fits into the specific (organizational) culture.

Overall, experts have become more reluctant to identify best-practices, although the field is also (and still) dominated by fashions and fashionable concepts. Take the case of disclosure policy which is one of the most popular instruments in the field of integrity policies. Mandated disclosure is attractive because it appeals to the free market principle, self-regulation, the autonomy principle, human empowerment and transparency, etc. However, the complex reality of monitoring disclosure and disclosure management is often overlooked. There is a huge difference between regulatory requirements to submit an interest declaration and the daily submission of interest declarations in real-life practice<sup>5</sup>. Increasingly, the management of conflicts of interest requires sophisticated and complex examinations into personal behaviour. Overall, individualized monitoring is complex, time-consuming and increasingly costly. On the other hand, countries shy away from investing in capacity-building. Trends in the field of disclosure policies can also easily lead to an ethics and control bureaucracy, which may remain relatively ineffective. In reality, the responsible officers must monitor more financial and non-financial interests, read, understand and interpret data, formulate the appropriate conclusions and have the courage to suggest sanctions. The latter is difficult, because this is not only a matter of technical interpretation of data and information. In fact, this is (often) highly sensitive and political. The increase in

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4. Anecharico, F./Jacobs, J. (1996), *The Pursuit of Absolute Integrity*, Chicago: Chicago University Press

5. <https://oecd-public-integrity-indicators.org/indicators/1000097/subindicators/1000406>

disclosure requirements must also be seen in connection with potential unintentional effects, such as the violation of privacy, the direct costs of disclosure, or the revelation of sensitive information for political purposes.<sup>6</sup> Therefore, further expanding the concept of conflicts of interest to include all sources of personal bias also threatens the effectiveness of conflicts of interest policies. Regulating and managing ever more potential sources of conflicts and of interests impose a heavy burden on experts and implementing authorities. But there is almost no discussion about the capacity limits of administrations, how they can further build capacities and keep pace in a context of ever growing (regulatory) implementation requirements. It is high time to address capacity building and institutionalization challenges in the field.

Developments are clearly positive, as the whole field of integrity policies finds itself in a process of re-orientation and innovation. For example, pragmatic reflection is growing about the right regulatory mix, the role of self-regulation, moral reasoning and biased judgment, knowledge about the effectiveness of deterrence mechanisms and sanctions, the need for better integrity policy impact assessments, and the need to overcome the classical distinction between compliance-based and value-based systems. Whereas Anti-corruption agencies (ACAs) have become the institutional cornerstone of combatting corruption worldwide, research is about to start on whether or in what conditions they are effective.

New attention is given to monitoring, measuring and benchmarking the effectiveness of integrity policies while acknowledging the prevailing challenges in measuring integrity, the shortage and low quality of data, and the need for new and clearer indicators and factors. This development towards the quantification of Governance (and a global metric society) reflects the popularity of evidence-based policies and data driven decision-making. However, complexity does not go away easily. The rising interest in ranking competitions, the popularity of rating countries and the desire to produce ever more state-centric statistics should not hide the fact that measuring institutional integrity is – still – a huge challenge.

Another so far underestimated policy concerns the revolving door issue. Managing revolving door policies is one of the most complex undertakings in integrity policies. For example, little is known about the “pull” and “push” factors influencing public officials in which sectors and whether and why certain functions and departments are more concerned than others<sup>7</sup>. Or who are the monitoring experts examining these cases. Managing and enforcing revolving door policies requires a time-consuming and highly technical case-by-case assessment. Often, administrations have too little expertise in place to rigorously monitor and enforce – especially – post-employment provisions. Consequently, national and European administrations rarely prohibit former staff or politicians from taking up a new job or activity. Thus, focusing the debate on the length of cooling-off periods will not help very much if we want to enhance the effectiveness of this instrument.

The case of revolving door policies illustrates another important turning point in the field of integrity policies: while people have a fundamental right to engage in work wherever they want, this must be balanced against the risks that any such moves may pose to the public interest, especially in the case of top-officials and politicians. Public administrations should be allowed to decide to prohibit intended jobs (or, to place conditions or restrictions on the former staff members’ activities in the new job). However, such restrictions must be necessary for the purposes of achieving a legitimate public interest, and must be proportionate. Overall, this requires a high degree of determination and, also, sensitivity of decision-makers.

Increasingly, it is also accepted that the management of integrity policies raises deep questions about the limits of the law. However, this discussion should not be replaced by a naïve request for more soft-instrument approaches. In fact, credible enforcement systems are needed as much as discussions about behavioural insights and nudging and how to overcome the toleration of misconduct. All of this can be combined.

Proponents of integrity management rightly claim that institutions can enhance individual and organizational performance, promote honour, respect, compassion, mindfulness, tolerance and anti-discrimination. However, it cannot be excluded that leadership and institutions can also promote and support unethical conduct, suppress morality, overstretch it, deviate and transgress from accepted norms and commit employees to unethical acts. Overall, it would be naïve to think that ethics management also pays in a context of democratic backsliding, at any time and, in any political context. There is a discernible perception that merit based and impartiality principles are at the very least being less implemented and enforced. At the same time, populists and authoritarian leaders gain political support based on their anti-elitist and anti-corruption agendas and when people are distrustful of those exercising power, politicians, political parties, and public authorities. In the same way, anti-corruption and integrity policies are easily abused as political stigmatisers and against good governance policies.

6. See the recent judgment by the ECJ, Case C-204/21.

7. Andrews, R. & Beynon, M., The revolving door in UK government departments, In Regulation & Governance, June 2023

The current political climate seems to be more favourable for integrity-based politics<sup>8</sup>. Moreover, despite trends towards critical governance, there are reasons to believe that, by historical comparisons, ministers and top-civil servants have become more ethically aware and sensitive than before. Compared to earlier decades, holders of public office must respect and apply many more rules and higher ethical standards. That being said, ministers and top-executive officials also overestimate their ability to deal with their own ethical challenges, or their capacity to deal with conflicts of interest consciously and impartially. Too often, unethical conduct by top-leaders is overlooked, and not enforced. Compared with earlier times, there has been an exponential rise in the number of scandals, while at the same time, “scandal fatigue” and “scandal toleration” are also rising.

Current political trends in international politics contribute to this because times are towards moral relativism, the acceptance of so-called “dirty-hands” dilemmas and a certain toleration of unethical conduct of leaders because of the popular perception that *this is just human*. These trends should not be accepted nor excused. Governments and leaders have a duty to adhere to universally accepted values, integrity principles and political leaders must lead by example. A range of virtues inspire trust and drive trustworthiness: integrity, reliability, competence, professionalism, accountability and fairness.

All of these examples point to the need to continue and to strive for more effectiveness. And countries do increasingly accept that they should introduce some kind of (powerful) external body as the main tool in monitoring and sanctioning conduct. Often, countries also add to external monitoring bodies so-called lobby-registers. Overall, arguments in favour of the introduction of more transparent and independent structures clearly outweigh the points that might be criticised.

Awareness is also growing that monitoring integrity requires more personnel resources and investment in IT systems. However, monitoring is not only a technical task. Instead, it is a borderline concept at the intersection of law, politics, economy, sociology, organizational behaviour and morality.

Integrity instruments and integrity strategies are rarely either black or white. Often it is difficult to determine what motives have influenced a professional decision. Differently to classical administrative doctrines, work (in the public sector) is not always predictable, clear, objective and rational. Instead, it is also paradoxical, individual, value-laden, emotional, pluralistic, political and unpredictable. This understanding also leads us to the conclusion that pursuing absolute and individual integrity in every sense of the word could mean that public institutions, organizations and their leaders end up pleasing no one. Integrity policies are fluid policies: whereas new ethical challenges constantly emerge, others decrease or even disappear at the same time.

Thus, despite the above mentioned trends towards an “ethicalisation” of public policies, we confirm the judgment of anti-corruption experts: “We know far more about the issue than we did 30 years ago, and we have a network of policies, organizations, and researchers on a scale, and level of sophistication, few could have imagined in earlier days [...]. Unfortunately ... few would argue we have decisively turned the tide”<sup>9</sup>. The boundaries between growing expectations and daily, grandiose ethical failure are thin. Whereas integrity policies are expanding and deepening, they also focus on individual causes for unethical conduct. Therefore administrations should not shy away from enforcing existing policies and rules against a certain group of individuals – top-officials and ministers.

The other problem concerns the (growing) management challenges. Despite trends towards the institution-alisation and even the bureaucratisation of integrity policies, at present almost no country is equipped with the necessary capacities and resources to effectively manage, monitor and enforce integrity policies. It is time to address the management challenges of integrity policies.

In Europe, GRECO was always and still is at the forefront of those (international) actors who show the highest engagement in the evaluation, monitoring and enforcement process. Our discussion proves that this is what matters most. Continued strong support for the GRECO work is indeed badly needed and clearly indispensable. As such, this is also a matter of political will; it is essential to move away from a scandal driven logic towards an effectiveness and enforcement driven logic.

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8. Demmke, C. & Autioniemi, J. & Lenner, F. (2021) Explaining the Popularity of Integrity Policies in Times of Critical Governance—The Case of Conflicts of Interest Policies for Ministers in the EU-Member States, *Public Integrity*, DOI:10.1080/10999922.2021.1987056

9. Johnston, M., and Fritzen, S. A. (2021). *The Conundrum of Corruption. Reform for Social Justice*. New York: Routledge, p.5

# FRAMEWORK FOR GRECO'S ONGOING WORK

## Council of Europe anti-corruption standards

The three unique treaties developed by the Council of Europe deal with corruption from the point of view of criminal, civil and administrative law. Corruption is seen not only as a threat to international business and financial interests, but to the values of democracy, human rights and the rule of law that are upheld by the Council of Europe. The [Criminal Law Convention on Corruption](#) (ETS No. 173) sets out common standards for corruption offences – among others, the establishment of criminal offences for active and passive bribery (as well as aiding and abetting in such offences) of domestic public officials, domestic public assemblies, foreign public officials, foreign public assemblies, members of international parliamentary assemblies and judges and officials of international courts; for active and passive bribery in the private sector and for trading in influence. Parties to the convention are required to provide for corporate liability, the protection of collaborators of justice and witnesses, and to establish in respect of the above-mentioned offences effective, proportionate and dissuasive sanctions. An [Additional Protocol](#) to ETS No. 173 (ETS No. 191) requires the establishment of criminal offences for active and passive bribery of domestic and foreign arbitrators and jurors.

The [Civil Law Convention on Corruption](#) (ETS No. 174) deals with compensation for damage, liability, contributory negligence, limitation periods, the validity of contracts, protection of employees, accounts and auditing, the acquisition of evidence, interim measures and international co-operation in relation to corruption defined as “requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or prospect thereof, which distorts the proper performance of any duty or behaviour required of the recipient of the bribe, the undue advantage or the prospect thereof”.

Accession by any state to either the Criminal Law or Civil Law Convention on Corruption leads automatically to becoming a member of GRECO.<sup>10</sup> On 20 October 2021, at the request of Morocco, the Committee of Ministers of the Council of Europe invited the country to accede to the Criminal and Civil Law Conventions on Corruption – pursuant to that invitation, the Council of Ministers of Morocco, chaired by the King, approved both conventions on 19 October 2023. Also at its own request, GRECO's most recent member, Kazakhstan, was invited by the Committee of Ministers of the Council of Europe to accede to the Criminal Law Convention on Corruption on 30 June 2022 – the invitation is valid for 5 years.

The same evaluation criteria and level of detailed scrutiny by GRECO apply to states whether they have ratified these treaties or not. To date, two GRECO member states have not yet ratified the Criminal Law Convention on Corruption (ETS No. 173). Three members have not yet ratified the Additional Protocol to the Criminal Law Convention on Corruption (ETS No. 191).

It is regrettable that at end 2023, 14 GRECO member states had still not ratified the Civil Law Convention on Corruption (ETS No. 174) despite its importance for the public, private (business) and not-for-profit sectors. The ratification process has not progressed substantially for some years and GRECO might decide in due course to revive that process e.g., through specific measures to promote the Convention. Likewise, while it is not a treaty that GRECO evaluates, it is regrettable that the number of parties to the Council of Europe Convention on the Manipulation of Sports Competitions (CETS No. 215) remains very low (nine) even though corruption and integrity cases affecting sports events, and competition-related business more generally, are now frequently and prominently in the public eye.

**Council of Europe Treaty Office:** <https://www.coe.int/en/web/conventions/home>

The treaties are complemented by the following legal instruments:

- ▶ **Twenty Guiding Principles** for the fight against Corruption (Committee of Ministers Resolution (97) 24)
- ▶ Recommendation on **Codes of Conduct for Public Officials** (including a model code) (Committee of Ministers recommendation to member States No. R(2000) 10)

<sup>10</sup>. The Russian Federation which became a member of GRECO by ratifying the Criminal Law Convention on Corruption in 2006, denounced the convention in 2023 and ceased to be a member of GRECO on 1 July 2023.

- ▶ Recommendation on **Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns** (Committee of Ministers recommendation to member States Rec(2003)4)

Furthermore, the Committee of Ministers has drawn GRECO's attention to anti-corruption components of other legal instruments and advisory texts that it can take into account in its work, for example:

- ▶ Convention on the **Manipulation of Sports Competitions** (CETS No. 215)
- ▶ Recommendation on the **Protection of Whistleblowers** (Committee of Ministers recommendation to member States CM/Rec(2014)7)
- ▶ Consultative Council of European Prosecutors Opinions: **European Norms and Principles concerning Prosecutors** (Rome Charter CCPE Opinion No.9), **Independence, accountability and ethics of prosecutors** (CCPE Opinion No. 13), **The role of prosecutors in fighting corruption and related economic and financial crime** (CCPE Opinion No. 14), **Councils of Prosecutors as key bodies of prosecutorial independence** (CCPE Opinion No. 18)
- ▶ Consultative Council of European Judges Opinions: **The Position of the Judiciary and its Relations with other Powers of State in a Modern Democracy** (CCJE Opinion No. 18), **Preventing corruption among judges** (CCJE Opinion No. 21), **The evolution of the Councils for the Judiciary and their role in independent and impartial judicial systems** (CCJE Opinion No. 24), **Freedom of expression of judges** (CCJE Opinion No. 25)
- ▶ Recommendation on the **Legal Regulation of Lobbying Activities in the Context of Public Decision-making** (Committee of Ministers recommendation to member States CM/Rec(2017)2)

## Methodology – Evaluation

GRECO evaluation procedures involve the collection of information through questionnaire(s), on-site country visits enabling evaluation teams to solicit further information during high-level discussions with domestic key players and practitioners, and the drafting of evaluation reports. These reports provide an in-depth analysis of the situation in each country and are examined and adopted by GRECO during its plenary meetings. Evaluation reports state whether legislation and practice comply with the provisions under scrutiny and address recommendations to member states when action is required. The authorities are asked to report subsequently on the measures taken, which are then assessed by GRECO under a specific compliance procedure.

## Methodology – Compliance

In the compliance procedure, GRECO monitors the implementation of the recommendations it has issued to the country in the evaluation report. The assessment of whether a recommendation has been implemented satisfactorily, partly or has not been implemented is based on a situation report, accompanied by supporting documents, submitted by the member under scrutiny. During the compliance procedure GRECO re-examines the concrete progress made in implementing the outstanding recommendations. Compliance reports adopted by GRECO also contain an overall conclusion on the implementation of all the recommendations, the purpose of which is to decide whether to close or continue the compliance procedure in respect of a particular member. For the 5<sup>th</sup> Evaluation Round, if at least two-thirds of the recommendations have been implemented satisfactorily or dealt with in a satisfactory manner, GRECO shall close the compliance procedure. The Rules of Procedure of GRECO foresee a procedure, based on a graduated approach, for dealing with members whose response to GRECO's recommendations has been found to be globally unsatisfactory (4<sup>th</sup> Round) or who have been found not to be in sufficient compliance with GRECO's recommendations (5<sup>th</sup> Round). These Rules also include a provision allowing GRECO to act on an ad hoc basis when an institutional reform, legislative initiative or procedural change by a member state might result in a serious violation by that member of a Council of Europe anti-corruption standard.

## Evaluation Rounds<sup>11</sup>

GRECO's monitoring work is organised in rounds. Each has its own thematic scope and makes reference to a range of Council of Europe standard-setting texts of pertinence to the issues examined.

11. See <https://www.coe.int/en/web/greco/evaluations>



#### **5<sup>th</sup> Evaluation Round** (launched on 1 January 2017)

*Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies*

*Central government (top executive functions)*

- ▶ System of government and top executive functions
- ▶ Anticorruption and integrity policy, regulatory and institutional framework
- ▶ Transparency and oversight of executive activities of central government
- ▶ Conflicts of interest
- ▶ Prohibition or restriction of certain activities
- ▶ Declaration of assets, income, liabilities and interests
- ▶ Accountability and enforcement mechanisms

*Law enforcement agencies*

- ▶ Organisation and accountability
- ▶ Anticorruption and integrity policy
- ▶ Recruitment, career and conditions of service
- ▶ Conflicts of interest
- ▶ Prohibition or restriction of certain activities
- ▶ Declaration of assets, income, liabilities and interests
- ▶ Oversight and enforcement

#### **4<sup>th</sup> Evaluation Round** (2012-2017)

*Prevention of corruption in respect of members of parliament, judges and prosecutors*

- ▶ Ethical principles and rules of conduct (all)
- ▶ Conflicts of interest (all)
- ▶ Recruitment, career and conditions of service (judges and prosecutors)
- ▶ Transparency of the legislative process (members of parliament)
- ▶ Remuneration and economic benefits (members of parliament)
- ▶ Prohibition or restriction of certain activities (all)
- ▶ Declaration of assets, income, liabilities and interests (all)
- ▶ Supervision and enforcement of rules and regulations (all)
- ▶ Advice, training and awareness (all)

#### **3<sup>rd</sup> Evaluation Round** (2007-2012)

*Theme I: Incriminations*

- ▶ Essential concepts to be captured in the definition of passive and active bribery offences as well as trading in influence
- ▶ Limitation periods
- ▶ Jurisdiction
- ▶ Special defences

*Theme II: Political funding*

- ▶ Transparency of books and accounts of political parties and election campaigns
- ▶ Monitoring of party and campaign funding
- ▶ Enforcement of the relevant funding rules

#### **2<sup>nd</sup> Evaluation Round** (2003-2006)

- ▶ Identification, seizure and confiscation of corruption proceeds

- ▶ Public administration and corruption (auditing systems, conflicts of interest, reporting of corruption and whistle-blower protection)
- ▶ Prevention of legal persons being used as shields for corruption
- ▶ Fiscal and financial legislation to counter corruption
- ▶ Links between corruption, organised crime and money laundering

#### 1<sup>st</sup> Evaluation Round (2000-2003)

- ▶ Independence, specialisation and means available to national bodies engaged in the prevention and fight against corruption
- ▶ Extent and scope of immunities from criminal liability.

Members that join GRECO after the close of an evaluation round undergo evaluations on the themes of previous rounds before joining the current one, starting with the first two rounds which are restructured into *Joint 1<sup>st</sup> and 2<sup>nd</sup> Round Evaluations*.

In June 2023, at its 94<sup>th</sup> Plenary Meeting, GRECO decided that the thematic focus of its **6<sup>th</sup> Evaluation Round** will be *Preventing corruption and promoting integrity at the sub-national level*. This constituted the first stage of GRECO's in-depth preparation for its future monitoring.

### Publication of reports

The long-standing practice whereby GRECO member states lift the confidentiality of reports shortly after their adoption and translate them into the national languages is extremely important. Raising awareness of GRECO's findings across society in this way prompts national debate and support for the implementation of its recommendations. The release of a report for publication is co-ordinated with the member state concerned and the Directorate of Communication of the Council of Europe to maximise media attention; this helps raise awareness in society and the institutions concerned about the expected reforms, which can in turn contribute to increasing support for their adoption and implementation.

# 5<sup>TH</sup> EVALUATION ROUND – PARAMETERS

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The ongoing 5<sup>th</sup> Evaluation Round that is devoted to *Corruption prevention and promoting integrity in central governments (top executive functions) and law enforcement agencies* constitutes a logical extension to the 4<sup>th</sup> Round with its implications for shaping the public's attitudes vis-à-vis their political institutions and democracy in general. Furthermore, while law enforcement authorities form a cornerstone of the fight against corruption, and their integrity is therefore fundamental, experience shows that the specific risk factors involved in the work of law enforcement agencies warrant careful attention.

For the purpose of the 5<sup>th</sup> Evaluation Round, the term “central government” includes persons who are entrusted with top executive functions at national level (PTEFs). Bearing in mind each country's constitutional set-up,<sup>12</sup> these functions might include those of heads of state, heads of central government, members of central government (e.g., ministers), as well as other political appointees who exercise top executive functions, such as deputy ministers, state secretaries, heads/members of a minister's private office (*cabinet ministériel*) and senior political officials. This might include political advisors, depending on the system of the country. Where political advisors are not evaluated in their own right, information about their interactions with PTEFs is nevertheless examined. Prior to the evaluation, the member state concerned is requested to submit a comprehensive and precise list of the “top executive functions” exercised by the head of state and by the head of the central government.

As regards Heads of State, GRECO decided (78th Plenary Meeting, December 2017) on the following definition for the 5<sup>th</sup> Round: “A Head of State would be covered by the 5th Evaluation Round under “central governments (top executive functions)” when s/he actively participates on a regular basis in the development and/or the execution of governmental functions, or advises the government on such functions. These may include determining and implementing policies, enforcing laws, proposing and/or implementing legislation, adopting and implementing by-laws/normative decrees, taking decisions on government expenditure, taking decisions on the appointment of individuals to top executive functions.”

Concerning law enforcement agencies, in the interests of providing a streamlined, in-depth assessment, GRECO's evaluation focuses on officials of selected bodies performing core law enforcement functions which are subject to national laws and regulations, that is police services at national level which may include agencies responsible for border control.<sup>13</sup> If a country has multiple police services at national level, the evaluation is limited to two or three main services. GRECO determines prior to the evaluation, on the basis of a reasoned proposal by the member state concerned, which services are to be evaluated.

In terms of the methodology and structure of evaluation reports, GRECO adopts a similar approach to that developed in the 4<sup>th</sup> Round. The questionnaire, which provides the main grid for evaluation, is divided into two parts: part (A) dealing with central governments (top executive functions) and part (B) dealing with selected law enforcement agencies. The first section of each part serves the purpose of generating fundamental input for obtaining an overall understanding of the system in each country.

Emphasis is put on the effective implementation of existing regulations. It is clear that effective corruption prevention relies to a large extent on the realisation of tangible achievements, and it is therefore crucial for GRECO evaluation teams to receive a maximum of information on practical and organisational arrangements, specific examples and statistics on the application of the law, and training, awareness-raising and other initiatives.

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12. In this context, the term “constitutional set-up” is to be understood as meaning a country's constitution, practice and specificities.

13. Administrative customs services and tax authorities are excluded from this evaluation.

# A NEW EVALUATION ROUND IN THE MAKING

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In June 2023, GRECO decided to devote its 6th Evaluation Round, which will be launched in 2025, to Preventing corruption and promoting integrity at the sub-national level. Directing its attention to local and regional authorities constitutes a logical extension to the 2nd, 4th and 5th Evaluation Rounds which covered essential components of central power. Sub-national authorities are responsible for a variety of public services and are an important part of national democracies. Their decisions affect citizens' lives in direct and immediate ways and by virtue of this proximity, they are at least as susceptible to corruption as the central public administration and Government.

In June 2023, the Plenary adopted the terms of reference of the working party tasked with determining the scope and focus of the evaluation, as well as preparing the draft questionnaire and other proposals related to the 6th Evaluation Round, whose work will be completed in 2024. The working party held its first meeting in October 2023 and agreed on proposals to the Plenary regarding the level of sub-national authorities to be evaluated, the officials and topics to be addressed, the evaluation and compliance methodology, as well as relevant standards and texts of reference. The Plenary endorsed these proposals in December 2023.

# GOVERNING STRUCTURES AND MANAGEMENT

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**T**he permanent bodies constituting GRECO are the Plenary, the Bureau and the Statutory Committee. The Statute also provides for ad hoc bodies, principally evaluation teams but also working parties.

## Plenary and Bureau

GRECO elects a President, Vice-President and Bureau for each new evaluation round. The position of President and Vice-President for the 5<sup>th</sup> Evaluation Round were taken up respectively in January 2017, by Marin MRČELA, Justice of the Supreme Court of Croatia and, in December 2019, by Monika OLSSON, Director of the Division for Criminal Law of the Ministry of Justice of Sweden. In 2023, the Bureau was composed of the President, Vice-President, and Panagiota VATIKALOU, Presiding Judge, Head of the First Instance Court of Chania (Greece); António DELICADO, Ministry of Justice (Portugal); Vita HABJAN BARBORIČ, Commission for the Prevention of Corruption (Slovenia); Olivier GONIN, Federal Office of Justice (Switzerland) and David MEYER, Ministry of Justice (United Kingdom).

The representatives of member states that compose the Plenary are directly involved in the peer review process during the examination and adoption of evaluation and compliance reports. The Plenary also takes final decisions on the focus of GRECO's monitoring, policy and planning.

## Statutory Committee – Budget and Programme of Activities

The Statutory Committee is composed of the Permanent Representatives of the member states of the Council of Europe (the Ministers' Deputies) and representatives of the GRECO member states that are not members of the Organisation (in 2023: Belarus,<sup>14</sup> Kazakhstan and the United States of America). Its principal task is to adopt GRECO's programme and budget which is prepared in line with the approach implemented throughout the Council of Europe and based on priorities presented by the Secretary General and on GRECO's annual programme of activities. In 2023, the Statutory Committee, presided by Sandy MOSS, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of the United Kingdom to the Council of Europe, approved GRECO's Programme for 2024-2027, Budget for 2024, and its Budget for 2025 on a provisional basis.

## Secretariat

The Secretariat headed, until September 2023, by Hanne JUNCHER, Executive Secretary, by Laura SANZ-LEVIA, Deputy Executive Secretary, in the interim period, and by Livia STOICA BECHT, Executive Secretary from 1 December 2023, provides support, guidance and technical and legal advice to the countries participating in GRECO's monitoring work and is responsible for the management of the budget and programme of activities, as well as external relations (cf. Appendix 5).

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14. Belarus's representation was limited as per the [decision of the Committee of Ministers of the Council of Europe of 17 March 2022](#).





On-site visit – Georgia



Farewell to the former Deputy Executive Secretary



On-site visit – Monaco



J. Edgar Hoover FBI Building



On-site visit – Armenia



On-site visit – USA

# APPENDICES

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## Appendix 1 – GRECO’s Mission

**T**he anti-corruption monitoring body of the Council of Europe has been operational since 1999. It was established as the result of the strong political will of Council of Europe member states to take decisive and enduring measures to counter corruption by ensuring adherence to, and effective implementation of, the Organisation’s anti-corruption standards. The mission of its membership, which extends beyond the geographical span of the Council of Europe, is to promote targeted anti-corruption action, awareness of corruption risks and careful consideration and implementation of reforms to remedy shortcomings in national policies, legislation and institutional set-ups.

The clear stated political objective of strengthening the capacity of member states to prevent and fight corruption is served by a monitoring model designed to provide each member state with a detailed analysis and set of recommendations that are tailored to the specificities of each country. Subsequent “compliance procedures” serve to verify achievements and actively push for alignment with what has been recommended. Multiple layers of result validation and a high level of process ownership are some of the important features of this model. The dynamics of mutual evaluation and peer pressure continue to be pivotal to GRECO’s work.



## Appendix 2 – Implementation Statistics

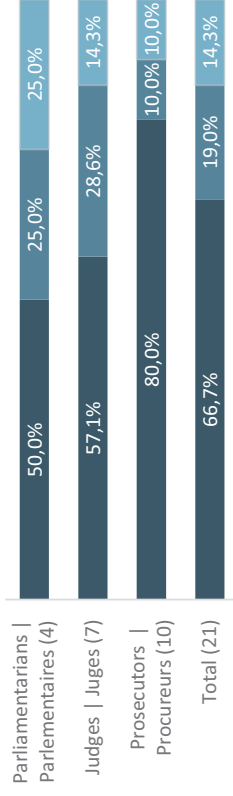
The tables presented here offer a visual representation of the state of implementation of GRECO's recommendations in respect of its member states individually. The statistics are not intended to be the basis of any ranking or direct comparison between countries when it comes to compliance with GRECO's recommendations or successful action against corruption. The aim is to provide a snapshot of progress made within GRECO's procedures vis-à-vis each member state. Readers should bear in mind that the member states are at different stages of GRECO's procedure for the respective evaluation rounds and that the duration of a monitoring procedure varies – from the baseline evaluation report through the compliance procedure until the closing of the round in respect of a particular state. The statistics take account of all compliance reports made public by end 2023 and the closing of a round is marked by an\*.

The year indicated is when the most recent published compliance report was adopted. The figures in brackets correspond to the number of recommendations made in respect of each category.

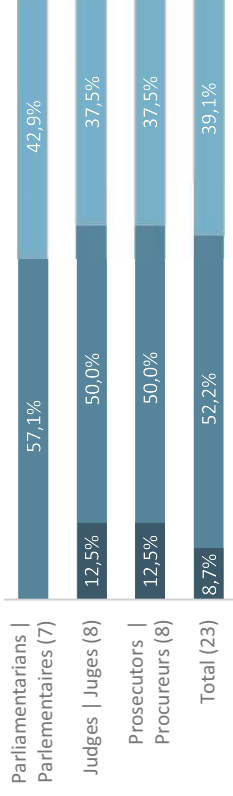
### 4<sup>th</sup> Evaluation Round – Prevention of corruption in respect of members of parliament, judges and prosecutors



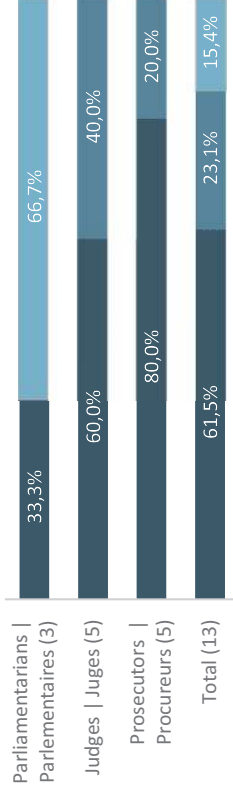
### Azerbaijan | Azerbaïdjan (2020)\*



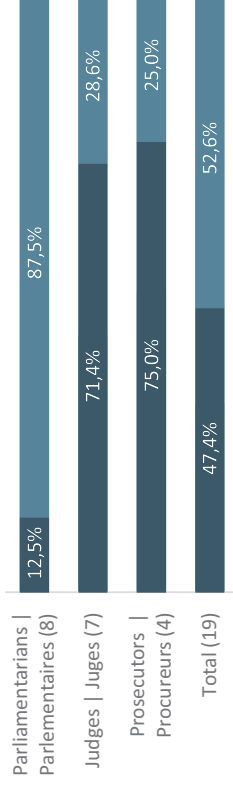
### Bosnia and Herzegovina | Bosnie-Herzégovine (2023)



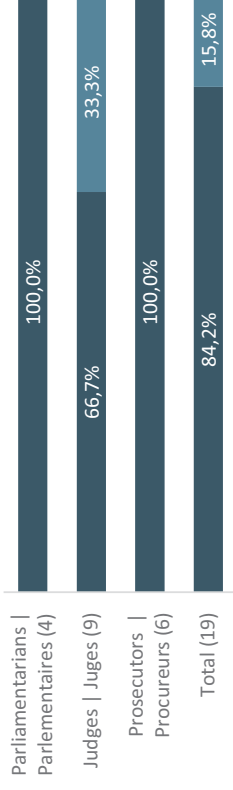
### Croatia | Croatie (2022)\*



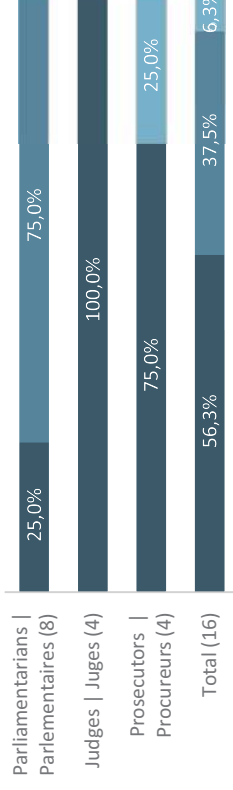
### Belgium | Belgique (2022)



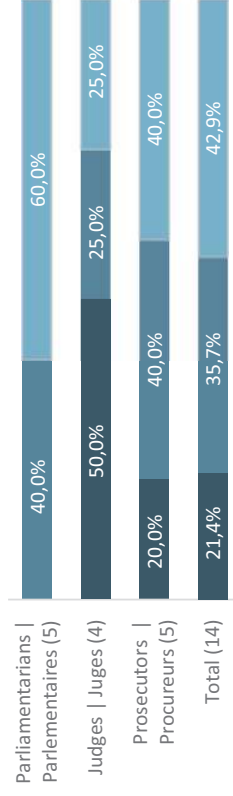
### Bulgaria | Bulgarie (2020)\*



### Cyprus | Chypre (2022)



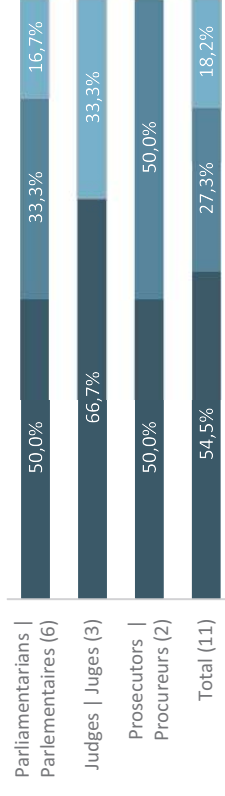
### Czechia | Tchéquie (2023)



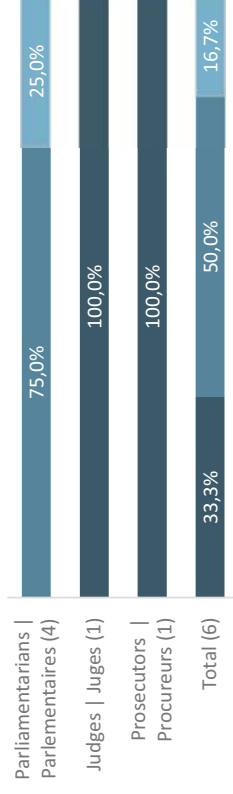
### Estonia | Estonie (2017)\*



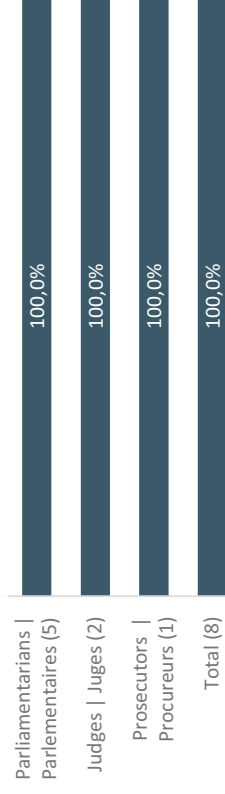
### France (2022)



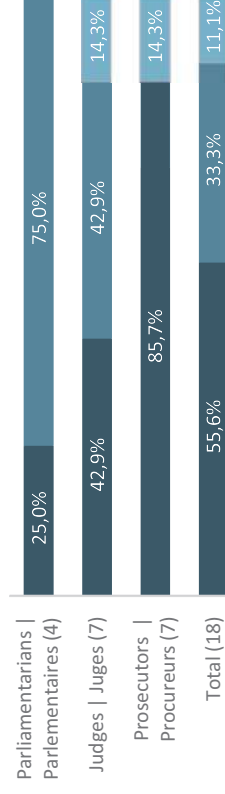
### Denmark | Danemark (2023)



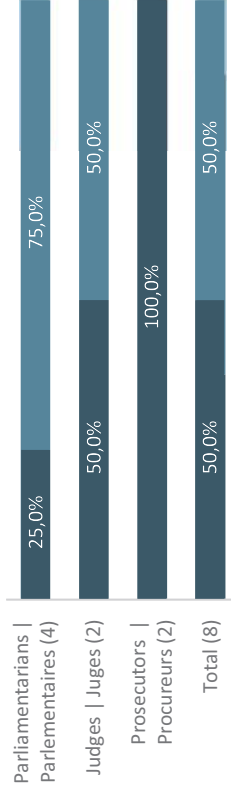
### Finland | Finlande (2017)\*



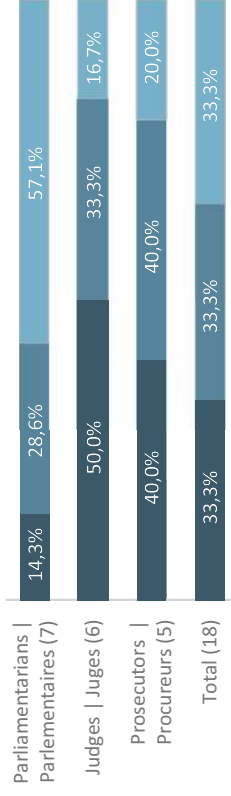
### Georgia | Géorgie (2022)



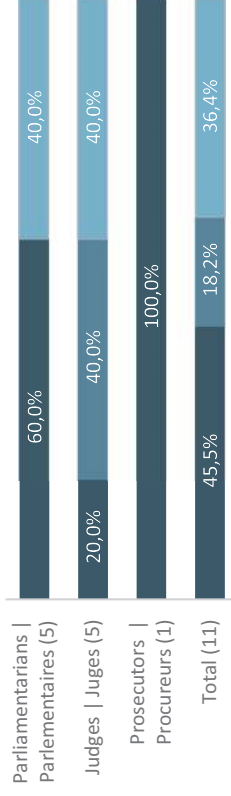
Germany | Allemagne (2022)



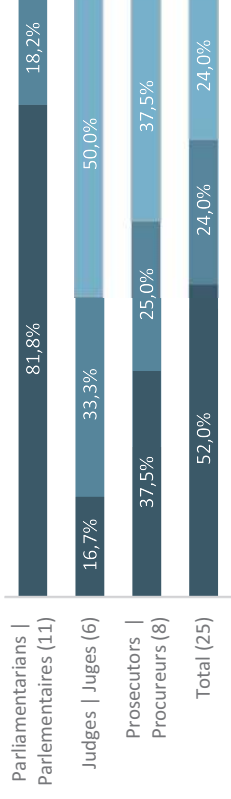
Hungary | Hongrie (2023)



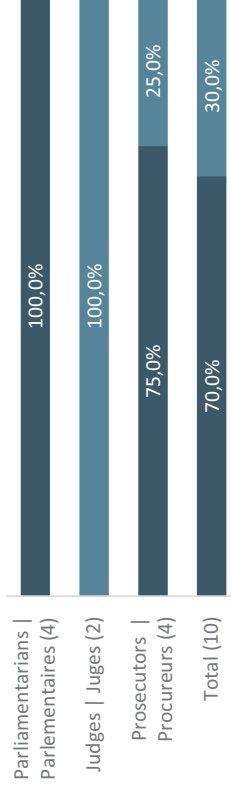
Ireland | Irlande (2022)



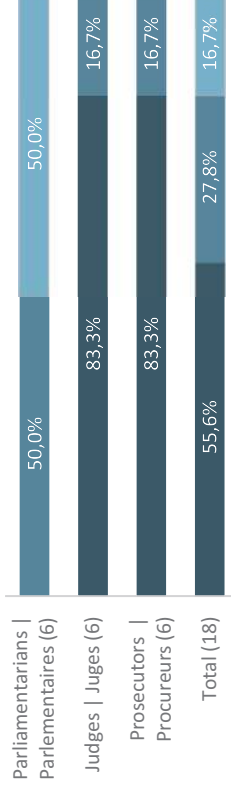
Greece | Grèce (2022)

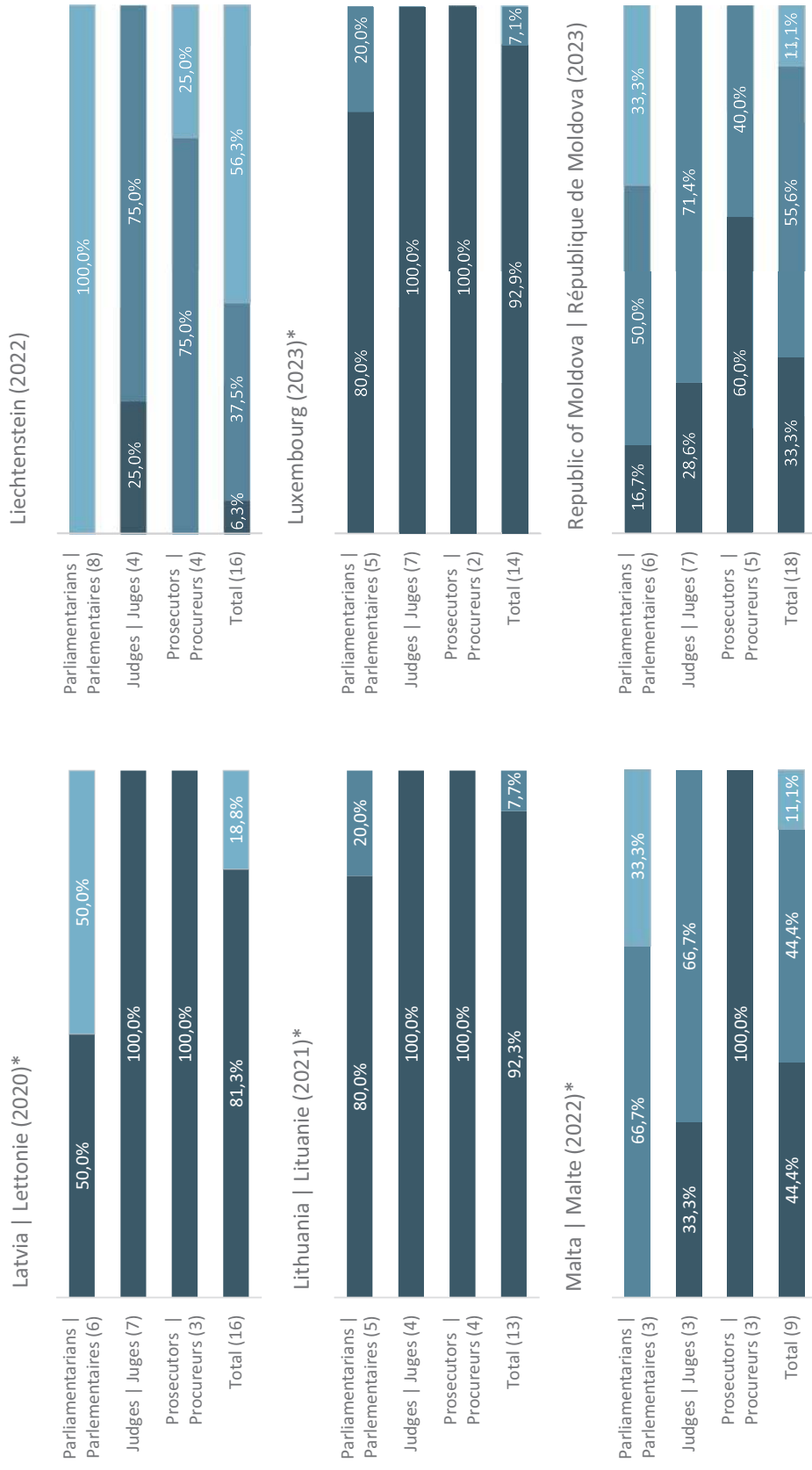


Iceland | Islande (2021)\*

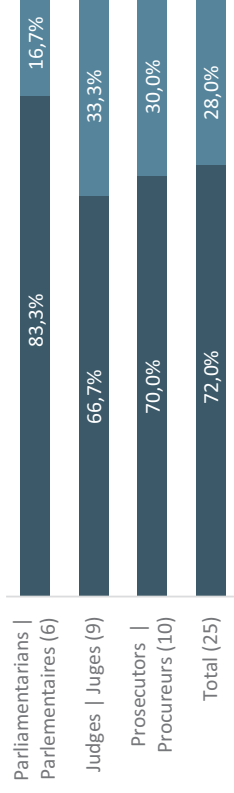


Italy | Italie (2022)

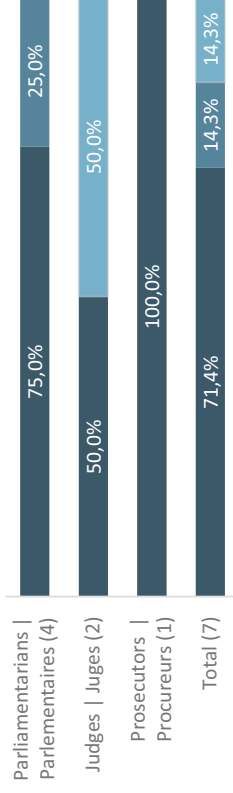




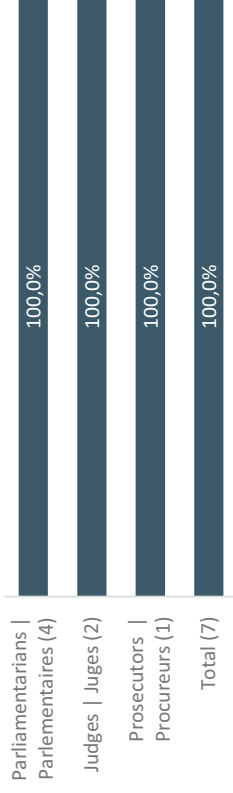
Monaco (2023)\*



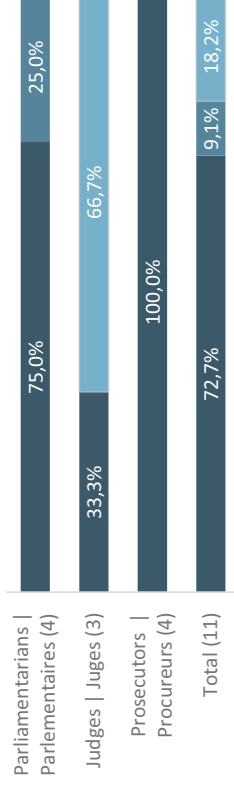
Netherlands | Pays-Bas (2021)\*



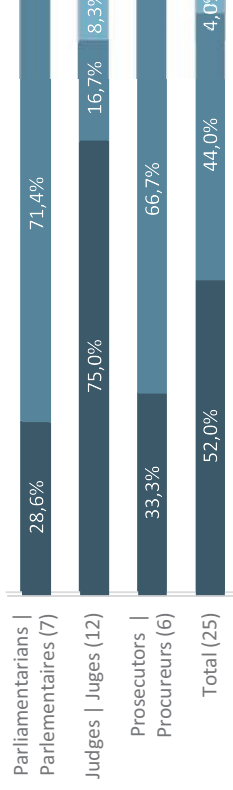
Norway | Norvège (2019)\*



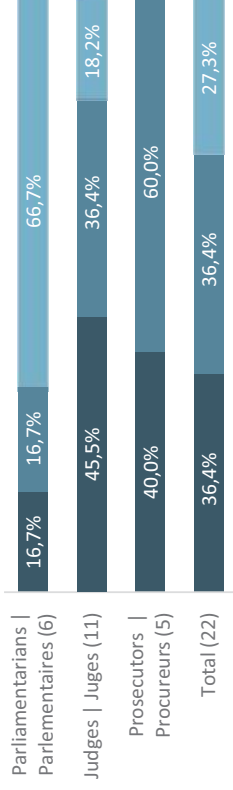
Montenegro | Monténégro (2019)\*



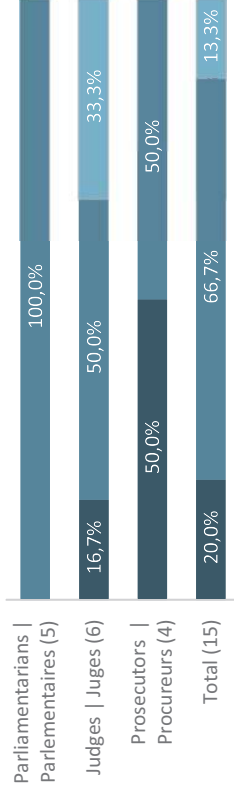
North Macedonia | Macédoine du Nord (2022)



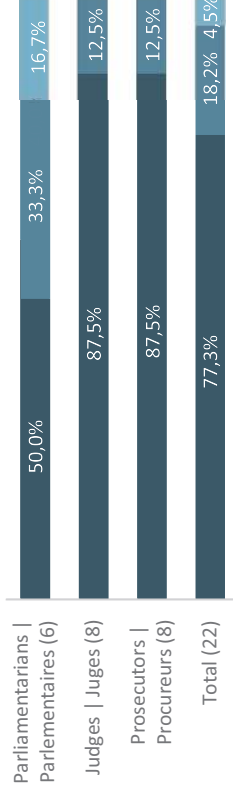
Poland | Pologne (2023)



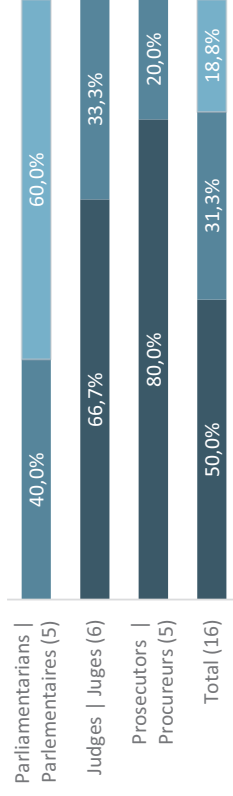
Portugal (2022)



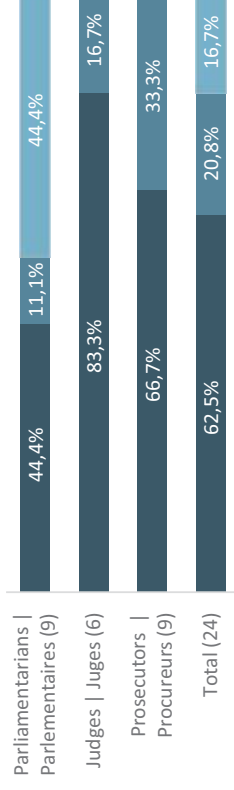
San Marino | Saint-Marin (2022)



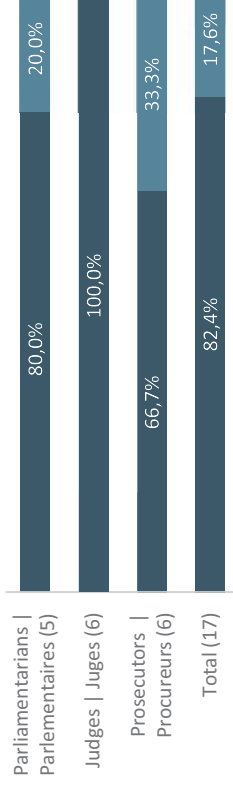
Slovak Republic | République slovaque (2020)\*



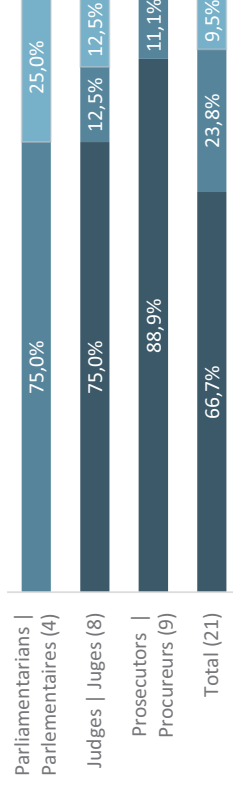
Romania | Roumanie (2022)



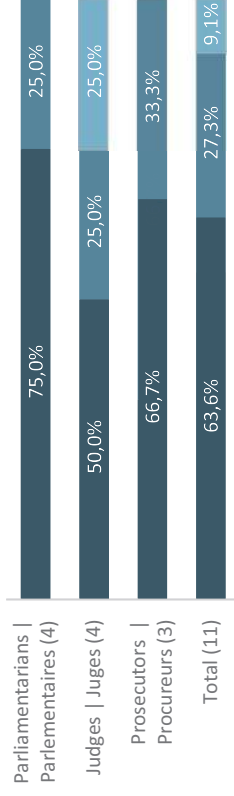
Serbia | Serbie (2023)



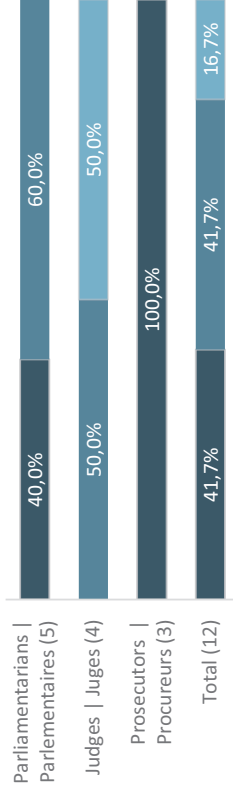
Slovenia | Slovénie (2018)\*



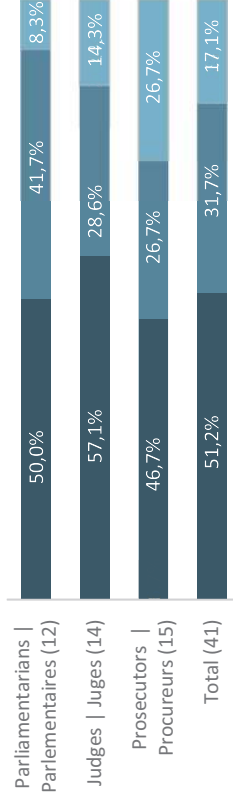
Spain | Espagne (2022)



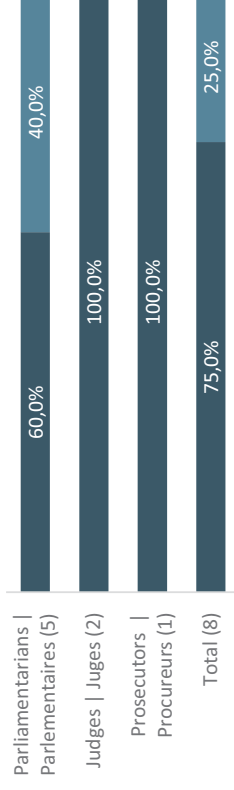
Switzerland | Suisse (2021)



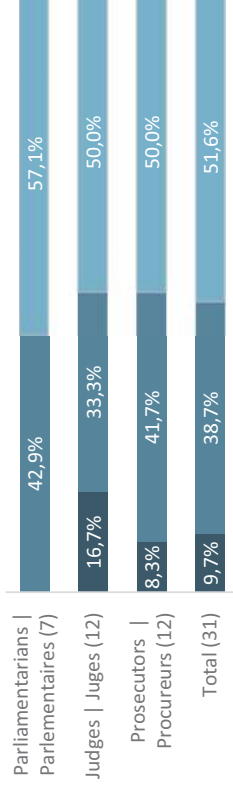
Ukraine (2023)



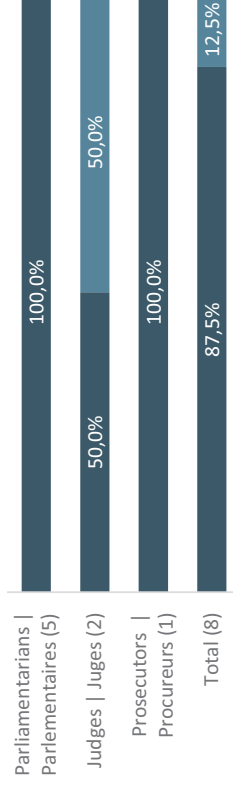
Sweden | Suède (2017)\*



Türkiye (2023)

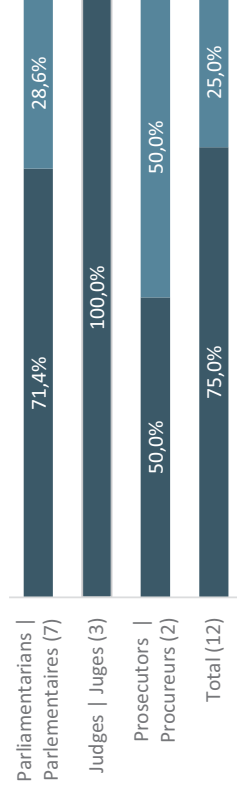


United Kingdom | Royaume-Uni (2017)\*





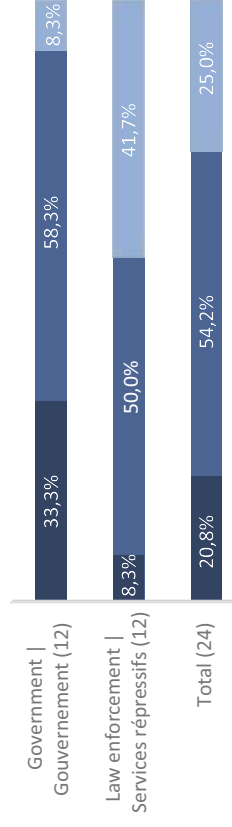
United States of America | Etats-Unis d'Amérique (2021)\*



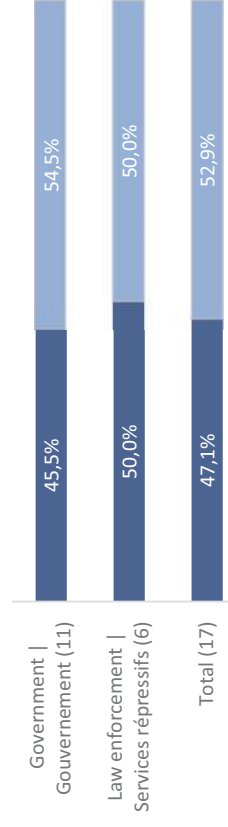
5th Evaluation Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

■ Implemented | Mise en œuvre ■ Partly implemented | Partiellement mise en œuvre ■ Not implemented | Non mise en œuvre

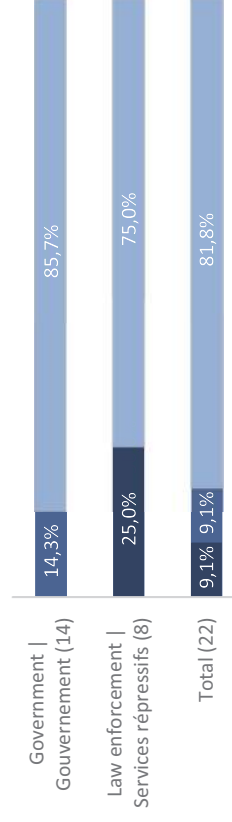
Albania | Albanie (2022)



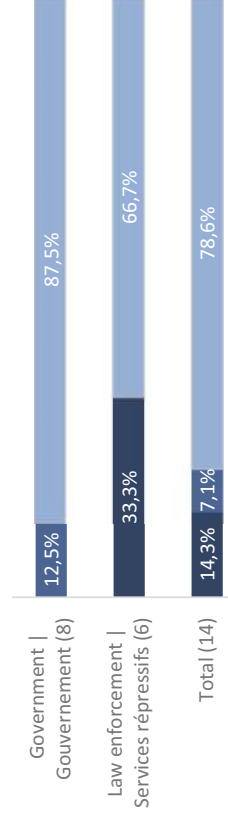
Croatia | Croatie (2021)



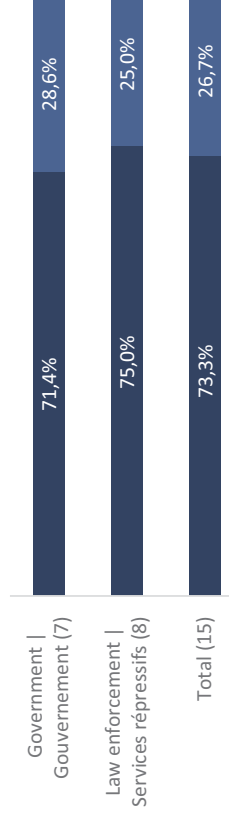
Belgium | Belgique (2021)



Denmark | Danemark (2021)



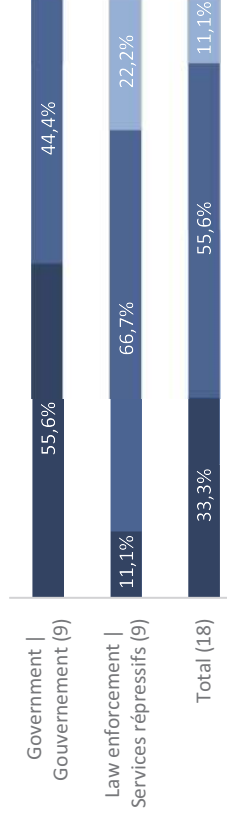
Estonia | Estonie (2023) \*



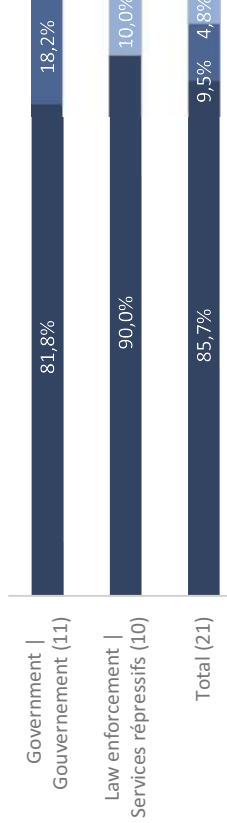
France (2021)



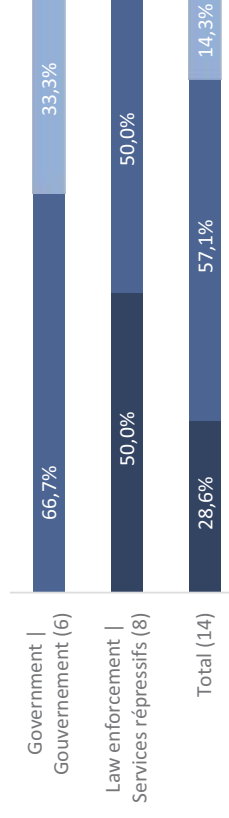
Iceland | Islande (2022)



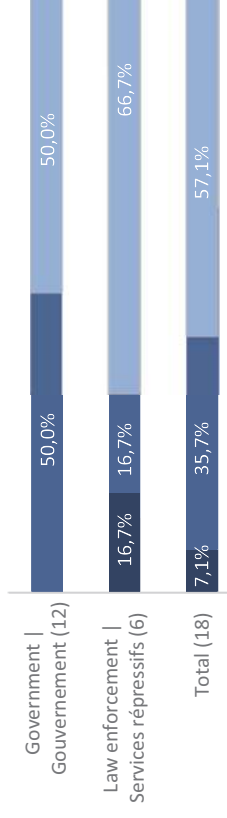
Luxembourg (2022) \*



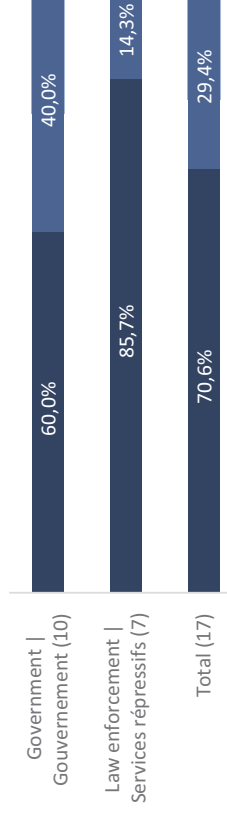
Finland | Finlande (2022)



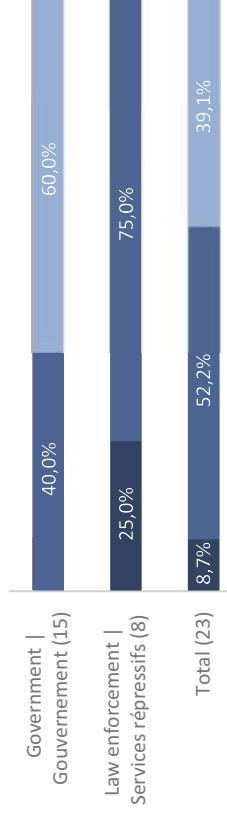
Germany | Allemagne (2022)

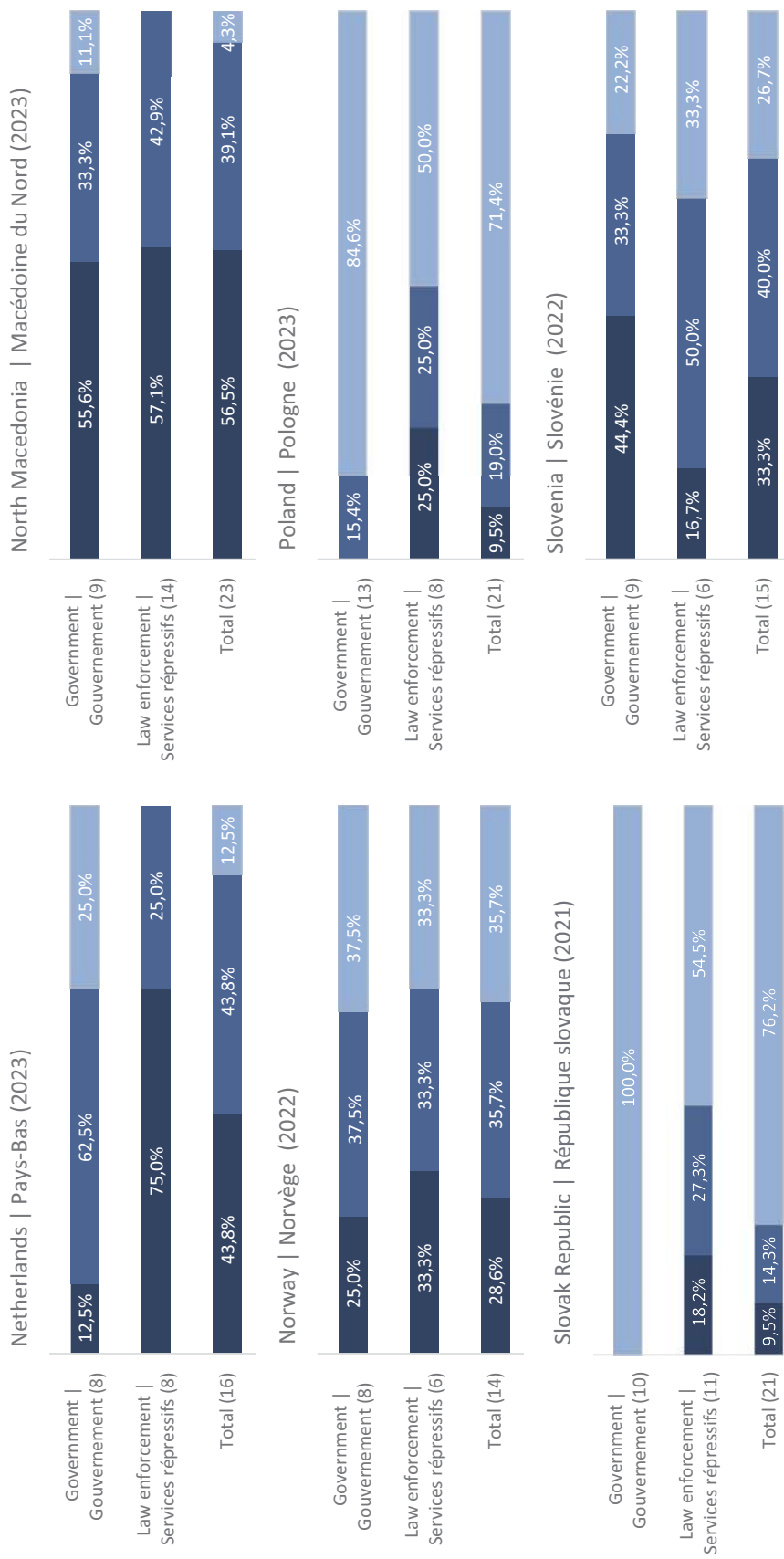


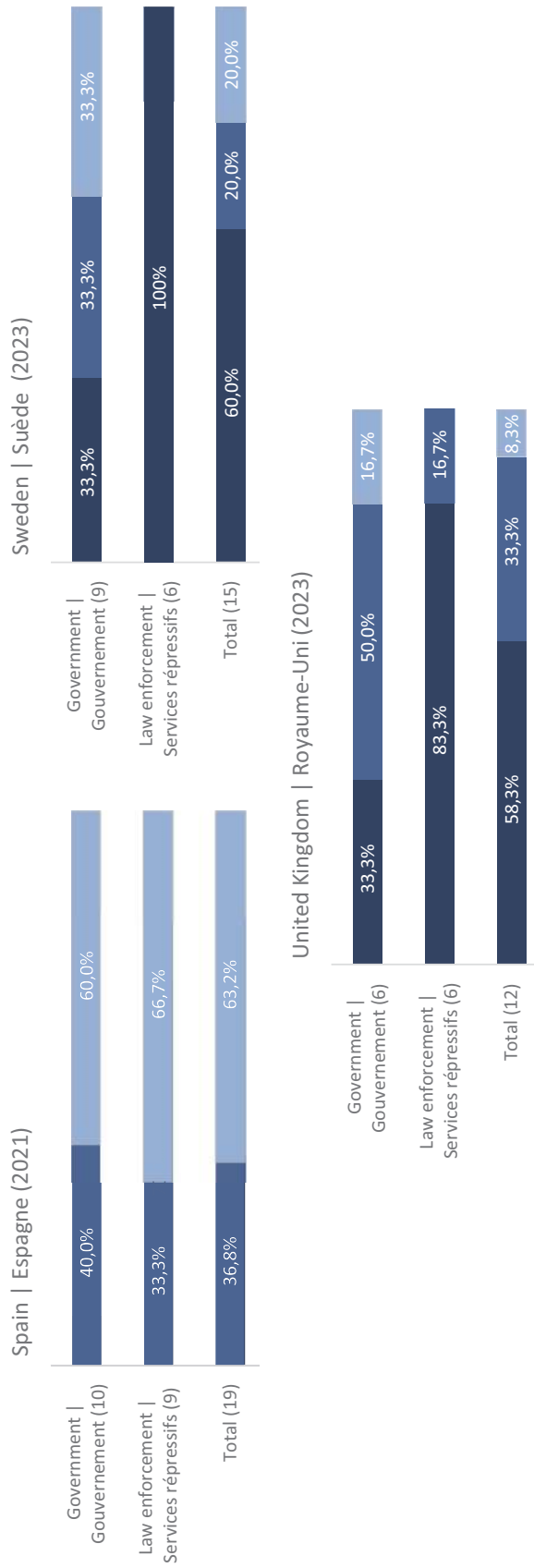
Latvia | Lettonie (2022) \*



Malta | Malte (2021)







## Appendix 3 – Core programme (2023)

### On-site evaluation visits in 2023

#### 5<sup>th</sup> Evaluation Round

- ▶ United States of America (8-12 May)
- ▶ Republic of Moldova (15-19 May)
- ▶ Italy (22-26 May)
- ▶ Georgia (19-23 June)
- ▶ Armenia (11-15 September)
- ▶ Switzerland (25-29 September)
- ▶ Andorra (20-24 November)
- ▶ Monaco (20-24 November)

### Meetings in 2023

#### GRECO Plenary

- ▶ GRECO 93 (20-24 March)
  - Exchange of views with the OSCE Office for Democratic Institutions and Human Rights (ODIHR) represented by Konstantine VARDZELASHVILI, Head of the Democratization Department, and Yulia NETESOVA, Chief of the Democratic Governance and Gender Unit in the same department
- ▶ GRECO 94 (5-9 June)
  - Exchange of views with Síofra O’LEARY, President of the European Court of Human Rights, accompanied by Georgios SERGHIDES and Peeter ROOSMA, Judges of the Court
- ▶ GRECO 95 (27 November – 1 December)
  - Exchange of views with Helena JÄDERBLOM, President of the Access Info Group (AIG) – one of the two monitoring bodies established by the [Tromsø Convention](#) (Council of Europe Convention on Access to Official Documents, CETS No. 205)

#### GRECO Bureau

- ▶ Bureau 101 (23 February)
- ▶ Bureau 102 (17 May)
- ▶ Bureau 103 (18 October)

#### GRECO Statutory Committee

32nd Meeting – Approval of GRECO’s Programme for 2024-2027, Budget for 2024, and its Budget for 2025 on a provisional basis (4 October)

### Evaluation reports adopted in 2023

#### 5<sup>th</sup> Evaluation Round

- ▶ Azerbaijan
- ▶ Cyprus
- ▶ Czechia
- ▶ Republic of Moldova
- ▶ Portugal
- ▶ Romania
- ▶ Türkiye
- ▶ United States of America

## Compliance reports adopted in 2023

### 5<sup>th</sup> Evaluation Round compliance procedure

- ▶ Estonia – procedures closed

#### *Rule 32 revised procedures – insufficient compliance*

- ▶ Denmark, Malta, Netherlands, North Macedonia, Poland, Slovak Republic, Spain, Sweden, United Kingdom – procedures opened

### 4<sup>th</sup> Evaluation Round compliance procedure

- ▶ Andorra, Ireland – procedures on-going
- ▶ Cyprus, France, Greece, Luxembourg, Monaco, North Macedonia, Serbia – procedures closed

#### *Rule 32 procedures – globally unsatisfactory compliance*

- ▶ Austria, Czechia – procedures re-opened
- ▶ Bosnia and Herzegovina, Denmark, Republic of Moldova, Poland (incorporating Rule 34 follow-up), Portugal, Türkiye – procedures maintained
- ▶ Armenia, Hungary, Liechtenstein, Ukraine – procedures closed

## Appendix 4 – GRECO delegations (at 11 December 2023)

### GRECO MEMBER STATES/ÉTATS MEMBRES DU GRECO

#### ALBANIA/ALBANIE

Ms Adea PIRDENI (Head of delegation)  
Deputy Minister  
Ministry of Justice

*Substitut/e*

Mr Ismail SHEHU  
Director General  
General Directorate of Programs and Projects in the  
field of Anticorruption  
Ministry of Justice

... *Nomination pending*

Directorate of Programs and Projects in the Field of  
Anticorruption  
Ministry of Justice

*Substitut/e*

Ms Rovena PREGJA  
Head of Unit  
Directorate of Programs and Projects in the field of  
Anticorruption  
Ministry of Justice

#### ANDORRA/ANDORRE

Mme Eva GARCIA LLUELLES (Cheffe de délégation)  
Ministère de la Justice et de l'Intérieur  
Relations et coopération internationales dans le  
domaine juridique

*Substitut/e*

Mme Marta VILLAGRASA  
Juriste du Service des relations juridiques  
internationales et de la coopération  
Département de la Justice et de l'Intérieur  
Ministère de la Justice et de l'Intérieur

#### ARMENIA/ARMÉNIE

Mr Karen KARAPETYAN (Head of delegation)  
Deputy Minister of Justice  
Ministry of Justice

*Substitut/e*

Ms Tatevik KHACHATRYAN  
Chief Specialist  
Monitoring Division  
Anti-Corruption Policy Development and  
Monitoring Department  
Ministry of Justice

Ms Hasmik TIGRANYAN  
Acting Head  
Anti-Corruption Policy Development and  
Monitoring Department  
Ministry of justice

#### AUSTRIA/AUTRICHE

Ms Katharina STEININGER (Head of delegation)  
Federal Ministry of Justice  
Section IV – Criminal Law  
Division IV 1 (Substantive Criminal Law)

*Substitut/e*

Mr Ernst SCHMID  
Acting Head of Department Resources, Support and  
Legal Affairs  
Federal Bureau of Anti-Corruption  
Federal Ministry of the Interior

*Substitut/e*

Ms Assunta THURNHER-SIGMAIER  
Unit 2.3 International Cooperation  
Federal Bureau of Anti-Corruption  
Federal Ministry of the Interior

## AZERBAIJAN/AZERBAÏDJAN

---

Mr Elnur MUSAYEV (Head of Delegation)  
Head of the Non-Criminal Proceedings Department  
Prosecutor's Office of the Republic of Azerbaijan

*Substitut/e*

Mr Emin NASIBOV  
Senior Adviser  
Department on the work with law enforcement  
agencies  
President's Office

Mr Ramin VALIZADA  
Executive Secretary  
Azerbaijan Anti-Corruption Commission

*Substitut/e*

Mr Sabuhi ALIYEV  
Head of Preventive Department  
Anti-Corruption Department  
General Prosecutor's Office

## BELARUS

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**Representation limited as per the decision of the Committee of Ministers of 17 March 2022**  
**Représentation limitée selon la décision du Comité des Ministres du 17 mars 2022**

## BELGIUM/BELGIQUE

---

M. Carl PIRON (Chef de délégation)  
Attaché au Service de la Politique Criminelle  
DG Législation, Libertés et Droits Fondamentaux  
Service Public Fédéral Justice (SPF Justice)

M. Jeroen CLARISSE  
Conseiller aux affaires juridiques de la Chambre des  
représentants  
Parlement fédéral  
Palais de la Nation

## BOSNIA AND HERZEGOVINA/BOSNIE-HERZÉGOVINE

---

Mr Adnan DLAKIĆ (Head of delegation)  
Expert Adviser for Combating Corruption  
Section for Combating Organized Crime & Corruption  
Ministry of Security

Mr Nenad EŠPEK  
Expert Adviser for Combating Organized Crime  
Section for Combating Organized Crime &  
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Ministry of Security

## BULGARIA/BULGARIE

---

Mr Georgi RUPCHEV (Head of delegation)  
Counsellor, Justice Unit  
Permanent Representation of Bulgaria to the EU

*Substitut/e*

Mr Florian FLOROV  
State Expert  
Directorate of International Legal Cooperation and  
European Affairs  
Ministry of Justice

## CROATIA/CROATIE

---

Mr Marin MRČELA  
**President of GRECO / Président du GRECO**  
Justice of the Supreme Court

Mr Ivan CRNČEC (Head of delegation)  
Adviser to the Minister of Justice and Public  
Administration

Mr Kršimir SIKAVICA  
Head of Sector  
Criminal Intelligence Sector  
Criminal Police Directorate  
General Police Directorate  
Ministry of the Interior



*Substitut/e*  
Mr Dražen JELENIC  
Deputy State Attorney General

*Substitut/e*  
Mr Mladen BRUČIĆ-MATIC  
Head of the Sector for Prevention of Corruption  
Directorate for European Affairs,  
International and Judicial Cooperation and Prevention  
of Corruption  
Ministry of Justice and Public Administration

## **CYPRUS/CHYPRE**

---

Ms Alexia KALISPERA (Head of delegation)  
Senior Counsel of the Republic  
The Law Office of the Republic

Ms Rena PAPAETI-HADJICOSTA  
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The Law Office of the Republic

*Substitut/e*  
Ms Theodora PIPERI-CHRISTODOULOU  
Counsel of the Republic A'  
The Law Office of the Republic

## **CZECHIA/TCHÉQUIE**

---

Ms Helena KLIMA LIŠUCHOVÁ (Head of delegation)  
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Department  
Ministry of Justice

Ms Johana TREŠLOVÁ  
Senior Ministerial Counsellor  
Conflict of Interest and Anti-Corruption Department  
Ministry of Justice

*Substitut/e*  
Ms Kristina KRÁL  
Senior Ministerial Counsellor  
Methodology and Conflict of Interest Control Unit  
Conflict of Interest and Fight Against Corruption  
Department  
Ministry of Justice

*Substitut/e*  
Ms Barbora HOLUŠOVÁ  
Senior Ministerial Counsellor  
International Cooperation and EU Department  
Ministry of Justice

## **DENMARK/DANEMARK**

---

Mr Jonathan GASSEHOLM (Head of Delegation)  
Senior Prosecutor  
State Prosecutor for Serious Economic  
and International Crime  
International Unit

*Substitut/e*  
Mr Andreas LAURSEN  
Senior Prosecutor  
State Prosecutor for Serious Economic and  
International Crime

*Substitut/e*  
Mr Jakob Gøtze PEDERSEN  
Chief Legal Advisor  
State Prosecutor for Serious Economic and  
International Crime

## **ESTONIA/ESTONIE**

---

Ms Kätlin-Chris KRUUSMAA (Head of delegation)  
Advisor, Analysis Division  
Criminal Policy Department  
Ministry of Justice

Ms Laura VAIK  
Advisor, Criminal Policy Department  
Ministry of Justice

*Substitut/e*  
Ms Anu KÄRTNER  
Advisor  
Anti-Corruption Select Committee  
Chancellery of the Riigikogu (parliament)

## FINLAND/FINLANDE

---

Mr Juha KERÄNEN (Head of delegation)  
Ministerial Adviser  
Department for Criminal Policy and Criminal Law  
Ministry of Justice

*Substitut/e*

Ms Venla MÄNTYSALO  
Senior Specialist  
Department for Criminal Policy and Criminal Law  
Ministry of Justice

Ms Katariina SIMONEN  
Ministerial Adviser  
Ministry of the Interior  
Police Department

## FRANCE

---

Mme Lise CHIPAULT (Chef de délégation)  
Magistrate – chargée de mission affaires civiles et pénales internationales auprès du Directeur des affaires juridiques  
Ministère des Affaires étrangères

*Substitut/e*

Mme Fiona HOUDIN  
Rédactrice spécialisée  
Bureau du droit économique, financier et social, de l'environnement et de la santé publique  
Direction des affaires criminelles et de grâces  
Ministère de la Justice

*Représentant (à titre honorifique)*

*Representative (honorary)*

M. Michel GAUTHIER

**Président honoraire du GRECO /  
Honorary President of GRECO**

M. Olivier RENUCCI  
Sous-direction du conseil, de l'analyse stratégique et des affaires internationales  
Chef du département du conseil aux acteurs publics  
Agence française anticorruption (AFA)

*Substitut/e*

Mme Gaelane PELEN  
Chargée de mission aux affaires internationales  
Agence française anticorruption (AFA)

## GEORGIA/GÉORGIE

---

Mr Razhdeni KUPRASHVILI (Head of delegation)  
Head of Anti-Corruption Bureau

*Substitut/e*

Ms Ana KALANDADZE (Head of delegation)  
Deputy Head  
Anti-Corruption Bureau

Ms Tamta KACHKACHISHVILI  
First Deputy Head  
Anti-Corruption Bureau

*Substitut/e*

Mr Ivane CHOGOVADZE  
Lawyer-Analyst  
Anti-Corruption Bureau

## GERMANY/ALLEMAGNE

---

Mr Markus BUSCH (Head of delegation)  
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Federal Ministry of Justice

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Division DG13 – Integrity, Corruption prevention, Sponsoring

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Division PM 1 (Remuneration of Members)  
Deutscher Bundestag – Verwaltung

*Substitut/e*

Ms Andrea ERIKSSON  
Head of Division  
Division PM 1 (Remuneration of Members)  
Deutscher Bundestag – Verwaltung –

## GREECE/GRÈCE

---

Ms Maria GAVOUNELI (Head of delegation)  
Professor of International Law  
National & Kapodistrian University of Athens  
Faculty of Law  
Management Board, National Transparency Authority

*Substitut/e*

Mr Panagiotis KAOURAS  
Inspector Auditor  
National Transparency Authority  
Inspections and Audits Unit

Ms Panagiota VATIKALOU  
**Bureau Member / Membre du Bureau**  
Presiding Judge | Head of the First Instance Court of  
Chania

*Substitut/e*

Mr Dimosthenis STINGAS  
Judge at the Court of Appeal of Thessaloniki

## HUNGARY/HONGRIE

---

Ms Nóra JAKUBOVICH (Head of Delegation)  
Head of Unit  
Department for European Home Affairs Cooperation  
Ministry of Interior

Ms Csilla ALFÖLDY  
National Protective Service  
Ministry of Interior

## ICELAND/ISLANDE

---

Mr Kjartan ÓLAFSSON (Head of delegation)  
Senior Legal Advisor  
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*Substitut/e*

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Deputy Director  
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Deputy Director of Public Prosecution  
Office of the Director of Public Prosecution

*Substitut/e*

Ms Ásthildur VALTÝSDÓTTIR  
Senior Legal Advisor  
Prime Minister's Office

## IRELAND/IRLANDE

---

Mr Nicholas J. MURPHY (Head of delegation)  
Assistant Principal Officer  
Economic, Transnational and Organised Crime Policy  
SMR and Applied Policy | Criminal Justice  
Department of Justice

*Substitut/e*

Ms Aoife BYRNE  
Justice Attaché  
Permanent Representation of Ireland  
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Ms Ciara MORGAN  
Government Reform Unit  
Department of Public Expenditure and Reform

*Substitut/e*

Mr Michael PERKINS  
Government Reform Unit  
Department of Public Expenditure and Reform

## ITALY/ITALIE

---

M. Raffaele PICCIRILLO (Chef de délégation)  
Chef du Cabinet du Ministre de la Justice

*Substitut/e*

Ms Emma RIZZATO  
Magistrate  
Ministry of Justice

M. Giuseppe BUSIA  
Président  
Autorité Nationale Anti-Corruption (ANAC)

*Substitut/e*

Mr Luca FORTELEONI  
Public Prosecutor  
Member of the Italian Anti corruption Authority Steer  
Committee (ANAC)

## KAZAKHSTAN

---

Mr Olzhas BEKTENOV (Head of delegation)  
Chairman  
Anti-Corruption Agency

Ms Leila IYLDYZ  
Officer-at-Large (Advisor)  
Anti-Corruption Agency

*Substitut/e*  
Mr Mustafa MUSLIMOV  
Head of International Cooperation Unit  
Anti-Corruption Agency

*Substitut/e*  
Ms Aizhan NURUMBAYEVA  
Officer for Special Matters  
Department for Legislation Development and  
International Cooperation  
Anti-Corruption Agency

## LATVIA/LETTONIE

---

Mr Jēkabs STRAUME (Head of delegation)  
Director  
Corruption Prevention and Combating Bureau  
(KNAB)

Mr Viktors LAIZĀNS  
Chief Inspector  
Department of Strategy  
Corruption Prevention and Combating Bureau (KNAB)

*Substitut/e*  
Mrs Inese ZELČA  
Head of the Policy Planning Division  
Policy Planning and Communication Department  
Corruption Prevention and Combating Bureau (KNAB)

## LIECHTENSTEIN

---

Ms Martina EDLUND (Head of delegation)  
Office for Foreign Affairs

Mr Harald OBERDORFER  
Lawyer | Ressort Justiz

*Substitut/e*  
Mr Panagiotis POTOLIDIS-BECK (Head of Delegation  
ad interim)  
Head of the Division for Economic Affairs and  
Development  
Office for Foreign Affairs

*Substitut/e*  
Mr Michael JEHLE  
Judge | Landgericht

## LITHUANIA/LITUANIE

---

Mr Augustas RUČINSKAS (Head of delegation)  
Chancellor of the Ministry of Justice  
Ministry of Justice

Ms Ilona TAMELĖ  
Senior Advisor  
Corruption Prevention and Internal  
Investigation Division  
Ministry of Justice

*Substitut/e*  
Ms Jolanta BERNOTAITĖ  
Head of the Corruption Prevention and Internal  
Investigation Division  
Ministry of Justice

*Substitut/e*  
Ms Ieva LUKOŠEVIČIENĖ  
Chief Specialist  
International Cooperation Division  
Special Investigation Service

## LUXEMBOURG

---

Mme Cindy COUTINHO (Cheffe de délégation)  
Attachée  
Déléguée du Gouvernement  
Ministère de la Justice  
Direction du droit pénal et pénitentiaire

M. Laurent THYES  
Conseiller de Direction adjoint  
Ministère de la Justice

*Substitut/e*  
M. Georges KEIPES  
Attaché  
Ministère de la Justice  
Direction des affaires pénales et judiciaires

*Substitut/e*  
M. Patrick THILL  
Employé juriste  
Ministère de la Justice  
Direction du droit pénale et pénitentiaire

## MALTA/MALTE

---

Mr Mario SPITERI (Head of Delegation)  
Office of the Attorney General

Ms Victoria BUTTIGIEG  
Attorney General  
Office of the Attorney General

*Substitut/e*  
Mr Kevin VALLETTA  
Office of the Attorney General

*Substitut/e*  
Mr Antoine AGIUS BONNICI  
Office of the Attorney General

#### **REPUBLIC OF MOLDOVA/RÉPUBLIQUE DE MOLDOVA**

---

Mr Alexandru CLADCO (Head of delegation)  
Prosecutor  
International legal assistance and Cooperation Unit  
General Prosecutor's Office

Mr Valeriu CUPCEA  
Head of the International Cooperation Directorate  
National Anti-corruption Centre

*Substitut/e*  
Mme Cornelia VICLEANSCHI  
Ancien Procureur  
Bureau du Procureur Général

#### **MONACO**

---

Mme Helene ZACCABRI (Chef de délégation)  
Chef de l'Inspection Générale de l'Administration

Mme Corinne LAFOREST DE MINOTTY  
Chargé de Mission auprès du Conseiller de  
Gouvernement-Ministre des Relations Extérieures et  
de la Coopération

*Substitut/e*  
Mme Jennifer PALPACUER  
Chef de Division  
Service d'Information et de Contrôle des  
Circuits Financiers

*Substitut/e*  
Mme Marie-Laure DUSSART  
Chef de Division  
Direction des Services Judiciaires

#### **MONTENEGRO/MONTÉNÉGRO**

---

Mr Boris VUKASINOVIC (Head of Delegation)  
Deputy Director  
Agency for Prevention of Corruption

*Substitut/e*  
Ms Ivona ĐURAŠKOVIĆ PAŠIĆ  
Independent Adviser  
Ministry of Justice

#### **NETHERLANDS/PAYS-BAS**

---

Mr Loek MATHIES (Head of Delegation)  
Policy advisor international affairs  
Ministry of the Interior and Kingdom Relations

Mr Hilbert ELSINGA  
Policy advisor police and security  
Ministry of Justice and Security

*Substitut/e*  
Ms Beatrice KEUNEN  
Policy advisor public integrity  
Ministry of the Interior and Kingdom Relations

#### **NORTH MACEDONIA/MACÉDOINE DU NORD**

---

Ms Besa ARIFI (Head of delegation)  
Professor of Criminal Law and Criminology  
Pro-Rector for Research and International Relations  
South East European University (SEEU)

Ms Biljana IVANOVSKA  
President  
State Commission for the Prevention of Corruption  
SKOPJE

*Substitut/e*  
Ms Elena SAZDOV  
Advisor  
Unit for the coordination of activities against corruption  
Department for international legal cooperation  
Ministry of Justice

*Substitut/e*  
Mr Vladimir GEORGIEV  
Commissioner  
State Commission for the Prevention of Corruption

## NORWAY/NORVÈGE

---

Ms Mona RANSEDOKKEN (Head of delegation)  
Policy Director  
Ministry of Justice and Public Security  
Police Department  
Section for crime prevention

Mr Jens-Oscar NERGARD  
Senior Adviser  
Ministry of Local Government and Modernisation

## POLAND/POLOGNE

---

Ms Katarzyna NASZCZYŃSKA (Head of Delegation)  
Director  
Department for Criminal Law Legislation  
Ministry of Justice

Ms Patrycja BALL  
Chief specialist  
European and International Criminal Law Division  
Department for Criminal Law Legislation  
Ministry of Justice

## PORTUGAL

---

Mr António DELICADO (Head of Delegation)  
**Bureau Member / Membre du Bureau**  
Legal Adviser  
Directorate General for Justice Policy  
International Affairs Department  
Ministry of Justice

Mr João Pedro Arsénio de OLIVEIRA  
European Affairs Coordinator  
Directorate General for Justice Policy  
International Affairs Department  
Ministry of Justice

*Substitut/e*

Ms Sara Nunes de ALMEIDA  
European Affairs Sub-Coordinator  
Directorate General for Justice Policy  
International Affairs Department  
Ministry of Justice

## ROMANIA/ROUMANIE

---

Mr Sorin TĂNASE (Head of delegation)  
Deputy director  
Directorate for Crime Prevention  
Ministry of Justice

Ms Anca JURMA  
Counsellor of the Chief prosecutor  
National Anticorruption Directorate  
Prosecutors' Office attached to the High Court of  
Cassation and Justice

*Substitut/e*

Ms Anca Luminița STROE  
Head of service  
National Agency for Managing Seized Assets  
Ministry of Justice

*Substitut/e*

Mr Mihăiță BĂRLICI  
Chief commissioner of police  
Director  
Directorate for Prevention  
General Anticorruption Directorate  
Ministry of Internal Affairs

## SAN MARINO/SAINT-MARIN

---

... (Head of delegation)  
*Nomination pending*

Mr Manuel CANTI  
Director of the Civil Service Department

*Substitut/e*

Ms Elisabetta BUCCI  
Counsellor  
Ministry of Foreign Affairs

*Substitut/e*

Ms Marina MARFORI  
State Lawyers' Office  
Expert in Legislative Studies

## SERBIA/SERBIE

---

Mr Dejan DAMNJANOVIĆ (Head of delegation)  
Director  
Agency for Prevention of Corruption

Mr Jovan COSIC  
Assistant Minister at the Ministry of Justice

*Substitut/e*  
Ms Bojana SMARTEK  
Head of European Integration  
Strategic Planning and Development Group  
Agency for Prevention of Corruption

*Substitut/e*  
Ms Neda MARKOVIC  
Senior Advisor for Normative Affairs  
Ministry of Justice

#### SLOVAK REPUBLIC/RÉPUBLIQUE SLOVAQUE

---

Ms Zuzana ŠTOFOVÁ (Head of delegation)  
Director, European and Foreign Affairs Division  
International Law Department  
Ministry of Justice

Ms Radka MONCOLOVÁ  
Legal Counsellor, European and Foreign Affairs  
Division  
International Law Department  
Ministry of Justice

*Substitut/e*  
Mr Marcel VEREŠ  
Director  
Prevention Corruption Division  
Office of Government

*Substitut/e*  
Ms. Katarína DUMANOVÁ  
Prevention Corruption Division  
Office of Government

#### SLOVENIA/SLOVÉNIE

---

Ms Vita HABJAN BARBORIČ (Head of delegation)  
**Bureau Member / Gender Equality Rapporteur**  
Head of the Corruption Prevention Bureau  
Commission for the Prevention of Corruption

*Substitut/e*  
Mr. Robert ŠUMI  
Chief Commissioner  
Commission for the Prevention of Corruption

#### SPAIN/ESPAGNE

---

Ms Ana ANDRES BALLESTEROS (Head of delegation)  
Head of Unit  
Unit for Justice Affairs in the EU and International  
Organizations  
Ministry of Justice

Ms Mercedes PÉREZ SANZ  
Technical Adviser  
Unit for Justice Affairs in the EU and International  
Organizations  
Ministry of Justice

*Substitut(e)*  
Ms Esperanza ZAMBRANO GÓMEZ  
Deputy Head of Unit  
Unit for Justice Affairs in the EU and International  
Organizations  
Ministry of Justice

#### SWEDEN/SUÈDE

---

Ms Monika OLSSON (Head of delegation)  
**Vice-President of GRECO/Vice-présidente  
du GRECO**  
Director  
Division for Criminal Law  
Ministry of Justice

Mr Johan DAVIDSSON  
Deputy Director  
Department for Public Administration  
Ministry of Finance

*Substitut/e*  
Mr Philip MIELNICKI  
Legal Adviser  
Division for Criminal Law  
Ministry of Justice

## SWITZERLAND/SUISSE

---

Mr Olivier GONIN (Head of delegation)  
**Bureau Member / Membre du Bureau**  
Deputy Head of the International Criminal Law Unit  
Federal Department of Justice and Police FDJP  
Federal Office of Justice FOJ

*Substitut/e*

M. Jacques RAYROUD  
Procureur général suppléant  
Ministère public de la Confédération

M. Jean-Christophe GEISER  
Avocat  
Conseiller scientifique  
Office fédéral de la justice

## TÜRKİYE

---

Mr Mustafa Tayyip ÇIÇEK (Head of delegation)  
Deputy Director General  
Directorate General for International Relations  
and EU Affairs  
Ministry of Justice

*Substitut/e*

Mr Mehmet Soner ÖZOĞLU  
Rapporteur Judge  
Directorate General for International Relations  
and EU Affairs  
Ministry of Justice

Ms Zehra Cansu ORHAN  
Chief of Department  
Directorate General for International Relations  
and EU Affairs  
Ministry of Justice

*Substitut/e*

Mr Furkan USTAOĞLU  
Rapporteur Judge  
Directorate General for International Relations  
and EU Affairs  
Ministry of Justice

## UKRAINE

---

Mr Oleksandr Fedorovych NOVIKOV (Head of delegation)  
Head  
National Agency on Corruption Prevention

*Substitut/e*

Mr Andriy Yevhenovych KOSTIN  
Chairperson  
Committee of the Verkhovna Rada on Legal Policy

Ms Anastasiya Olehivna RADINA  
Chairperson  
Committee of the Verkhovna Rada on Anticorruption  
Policy

*Substitut/e*

Ms Halyna Ihorivna YANCHENKO  
Deputy Chairperson  
Committee of the Verkhovna Rada on Anticorruption  
Policy

## UNITED KINGDOM/ROYAUME-UNI

---

Mr David MEYER (Head of delegation)  
**Bureau Member / Membre du Bureau**  
Head of International and Trade  
International, Rights and Constitutional Policy  
Directorate  
Ministry of Justice

*Substitut/e*

Ms Sarah Noor ATTIA  
Policy Advisor on International Justice Policy  
Ministry of Justice

Ms Fariha KHAN  
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International, Rights and Constitutional Policy  
Directorate  
Ministry of Justice

## UNITED STATES OF AMERICA/ÉTATS-UNIS D'AMÉRIQUE

---

Ms Michelle MORALES (Head of delegation)  
Deputy Director, Office of Policy and Legislation  
Criminal Division  
U.S. Department of Justice

Mr Alejandro GARCIA  
Anti-Corruption Advisor, Multilateral Affairs  
Office of Global Programs and Policy (INL/GPP)  
Bureau of International Narcotics and Law  
Enforcement Affairs  
U.S. Department of State



*Substitut/e*  
Ms Jessica KIM  
U.S. Special Prosecutor for the Crime of Aggression  
Criminal Division  
U.S. Department of Justice

*Substitut/e*  
Ms Melissa DYMEK  
Foreign Affairs Officer  
Bureau of European and Eurasian Affairs  
U.S. Department of State

## **COUNCIL OF EUROPE/CONSEIL DE L'EUROPE**

### **GRECO'S STATUTORY COMMITTEE/COMITÉ STATUTAIRE DU GRECO**

Mr Sandy MOSS  
Ambassador Extraordinary and Plenipotentiary  
Permanent Representative of the United Kingdom to  
the Council of Europe

**President of GRECO's Statutory Committee**

### **PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE (PACE)/ ASSEMBLÉE PARLEMENTAIRE DU CONSEIL DE L'EUROPE (APCE)**

Mr Titus CORLĂȚEAN  
(Romania – Parliamentary Assembly Committee on  
Legal Affairs and Human Rights)

*Substitut/e*  
Ms Elena-Simona SPĂȚARU  
(Romania – Parliamentary Assembly Committee on  
Legal Affairs and Human Rights)

### **EUROPEAN COMMITTEE ON LEGAL COOPERATION/COMITÉ EUROPÉEN DE COOPÉRATION JURIDIQUE (CDCJ)**

No nomination

Pas de nomination

### **EUROPEAN COMMITTEE ON CRIME PROBLEMS/COMITÉ EUROPÉEN POUR LES PROBLÈMES CRIMINELS (CDPC)**

No nomination

Pas de nomination

### **COUNCIL OF EUROPE DEVELOPMENT BANK/BANQUE DE DÉVELOPPEMENT DU CONSEIL DE L'EUROPE (CEB)**

Ms Katherine DELIKOURA  
Chief Compliance Officer

## **OBSERVERS/OBSERVATEURS**

### **ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD)/ ORGANISATION DE COOPÉRATION ET DE DÉVELOPPEMENT ÉCONOMIQUES (OCDE)**

Ms Olga SAVRAN  
Anti-Corruption Network for Transition Economies  
within Anti-Corruption Division

*Substitut/e*  
Ms France CHAIN  
Anti-Corruption Division  
Directorate for Financial and Enterprise Affairs

*Substitut/e*  
Ms Tanya KHAVANSKA  
Anti-Corruption Division  
Directorate for Financial and Enterprise Affairs

### **UNITED NATIONS, REPRESENTED BY THE UN OFFICE ON DRUGS AND CRIME (UNODC)/ NATIONS UNIES, REPRÉSENTÉES PAR L'OFFICE DES NATIONS UNIES CONTRE LA DROGUE ET LE CRIME (ONU DC)**

Ms Brigitte STROBEL-SHAW  
Chief, Corruption and Economic Crime Branch

Ms Stefanie HOLLING  
Corruption and Economic Crime Branch

### **INTERNATIONAL ANTI-CORRUPTION ACADEMY/ ACADÉMIE INTERNATIONALE DE LUTTE CONTRE LA CORRUPTION (IACA)**

Mr Thomas STELZER  
Dean and Executive Secretary

Mr Jaroslaw PIETRUSIEWICZ  
Chief of Staff, Head of External Relations & Strategic  
Partnerships

*Substitut/e*  
Ms Simona MARIN  
Deputy Head of External Relations & Strategic  
Partnerships

*Substitut/e*  
Ms Doris KUEN  
External Relations Officer and  
Special Assistant to the Dean and Executive Secretary

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**ORGANIZATION OF AMERICAN STATES (OAS)/ORGANISATION DES ÉTATS AMÉRICAINS (OEA)**

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Mr Jorge GARCIA-GONZALES  
Director of the Department of Legal Cooperation  
Secretariat for Legal Affairs

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**INTERNATIONAL INSTITUTE FOR DEMOCRACY AND ELECTORAL ASSISTANCE/**

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**INSTITUT INTERNATIONAL POUR LA DÉMOCRATIE ET L'ASSISTANCE ÉLECTORALE (International IDEA)**

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Mr Sam VAN DER STAAK  
Senior Programme Manager

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**OSCE OFFICE FOR DEMOCRATIC INSTITUTIONS AND HUMAN RIGHTS (OSCE/ODIHR)/  
BUREAU DES INSTITUTIONS DÉMOCRATIQUES ET DES DROITS DE L'HOMME DE L'OSCE (OSCE/BIDDH)**

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Ms Yulia NETESOVA  
Chief of Democratic Governance and Gender Unit

Ms Nina CHANTURIA  
Associate Democratic Governance Officer

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**EUROPEAN UNION/UNION EUROPÉENNE**

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Ms Ute STIEGEL  
Deputy Head of Unit  
A4: Enforcement, transparency and rule of law  
monitoring  
DG Migration and Home Affairs  
European Commission

Mr Jeroen BLOMSMA  
Head of Sector, Anti-Corruption  
A4: Enforcement, transparency and rule of law  
monitoring  
DG Migration and Home Affairs  
European Commission

*Substitut/e*  
Mr Per IBOLD  
Deputy, Minister Counsellor  
European Union Delegation to the Council of Europe

*Substitut/e*  
Ms Giulia RANGHIERO  
Policy officer, Anti-Corruption  
A4: Enforcement, transparency and rule of law  
monitoring  
DG Migration and Home Affairs  
European Commission

## Appendix 5 – Contacts and outreach (2023)

### GRECO Plenary

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- ▶ Exchange of views with the OSCE Office for Democratic Institutions and Human Rights (ODIHR) represented by Konstantine VARDZELASHVILI, Head of the Democratization Department, and Yulia NETESOVA, Chief of the Democratic Governance and Gender Unit in the same department (93<sup>rd</sup> GRECO Plenary Meeting, 23 March)
- ▶ Exchange of views with the President of the European Court of Human Rights Síofra O'LEARY, accompanied by Judges of the Court Georgios SERGHIDES and Peeter ROOSMA (94<sup>th</sup> GRECO Plenary Meeting, 8 June)
- ▶ Exchange of views with Helena JÄDERBLOM, President of the Access Info Group – one of the two monitoring bodies established by the Council of Europe Convention on Access to Official Documents (CETS No. 205), known as the Tromsø Convention (95<sup>th</sup> GRECO Plenary Meeting, 30 November)

### European Union (EU)

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- ▶ Horizontal consultations at the request of the European Commission, DG-JUST (online, 1 February) – Secretariat
- ▶ Bilateral discussions at the request of the European Commission, DG-NEAR (online, 1-2 March and 7-8 June) – Secretariat
- ▶ Europol First Conference on Law Enforcement Corruption (The Hague, 4 May) – Secretariat
- ▶ European Parliament Special committee on foreign interference in all democratic processes in the EU, including disinformation, and the strengthening of integrity, transparency and accountability in the European Parliament, hearing on *Democratic institutions and rules on transparency, integrity, accountability and anti-corruption* (Strasbourg, 30 May) – Secretariat
- ▶ European Parliament Greens/EFA group public roundtable on where things are 6 months after the so-called "Qatar-gate" scandal (online, 6 June) – Secretariat
- ▶ Meeting of the Democracy, Rule of Law and Fundamental Rights Monitoring Group (DRFMG) of the European Parliament (Strasbourg, 13 June) – Secretariat
- ▶ Swedish Presidency of the Council of the European Union *Stockholm Symposium on Democracy and the Rule of Law*, Discussion session: Fine-tuning the toolbox – Further improvements to strengthen the rule of law (Stockholm, 21-22 June) – Secretariat
- ▶ First meeting of the *EU Network Against Corruption* (Brussels, 20 September) – Secretariat
- ▶ Meeting with Mr Carl Dolan, Senior Adviser, Office of the European Ombudsman (23 November) – Secretariat
- ▶ European Parliament LIBE Committee inter-parliamentary committee meeting, session on The fight against corruption as a key pillar of democracy (online, 4 December) – Secretariat

### Organisation for Economic Co-operation and Development (OECD)

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- ▶ OECD Working Group on Bribery in International Business Transactions (online, 7-10 March) – Secretariat
- ▶ OECD Global Anti-Corruption and Integrity Forum (Paris, 24-25 May) – Secretariat
- ▶ OECD-Anti-Corruption Network for Eastern Europe and Central Asia (OECD-CAN) Plenary 22nd Monitoring Meeting and 28th Steering Group Meeting (Paris, 3-5 October) – Secretariat

### Organization of American States (OAS)

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- ▶ OAS Roundtable – Panel on corruption and gender (online, 14 March) – Secretariat
- ▶ Plenary of the OAS Follow-up Mechanism for the Implementation of the Inter-American Convention against Corruption (MESICIC) Panel on preventing and managing conflicts of interest (online, 13 September) – Secretariat

## United Nations

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- ▶ Meeting with Political Affairs Officers from the United Nations Headquarters, Departments for Political and Peacebuilding Affairs and Peace Operations-Europe and Central Asia Division (DPPA-DPO/ECAD) (Strasbourg, 17 January) – Secretariat
- ▶ Interview with the UNODC and a consultant on the transition in GRECO between review phases and experience on follow-up and compliance (27 April) – Secretariat
- ▶ 14<sup>th</sup> Session of the Implementation Review Group (IRG) of the United Nations Convention against Corruption (UNCAC) and 14<sup>th</sup> Session of the Open-ended Intergovernmental Working Group on the Prevention of Corruption (online, Vienna, 12-16 June) – Secretariat
- ▶ Resumed 14<sup>th</sup> Session of the Implementation Review Group (IRG) of the United Nations Convention against Corruption (UNCAC) (Vienna, 4 September) – Secretariat
- ▶ 1<sup>st</sup> intersessional meeting of the UN Commission on Crime Prevention and Criminal Justice Thematic session 2: Effective, accountable, impartial and inclusive institutions; effective anti-corruption efforts; social, educational and other measures (online, 21-22 September) – Secretariat
- ▶ 10<sup>th</sup> session of the Conference of the States Parties to the United Nations Convention against Corruption and a High-level side meeting of organisations and anti-corruption review mechanisms [Walk the talk: Strengthening synergies and coordination](#) (Atlanta, 11-15 December) – President, Secretariat

## Other contacts

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- ▶ International Partnership against Corruption in Sport (IPACS) Steering committee meetings (online, 18 January and Paris, 5 May) – Secretariat
- ▶ Interview for POLITICO's weekly newsletter *EU Influence* (19 January 2023) – President
- ▶ Police academy ERIP-Haren, Brussels *Integrity day* (video interview, 20 January) – Secretariat
- ▶ Meeting with Johanna SUURPÄÄ, Director General of the Department for Democracy and Public Law and Jussi MÄKELÄ, Senior Specialist (EU and international affairs), Ministry of Justice of Finland, accompanied by Ambassador Nina NORDSTRÖM, Permanent Representative of Finland to the Council of Europe (Strasbourg, 24 January) – Secretariat
- ▶ Meeting with the President of the Senate of the Parliament, Jan BRUIJN and the Secretary General of the Senate, Remco NEHMELMAN, of the Netherlands (Strasbourg, 26 January) – Secretariat
- ▶ Cooperation and synergy meetings with GRECO Secretariat counterparts in the UNODC, the OECD Working Group on Bribery in International Business Transactions, and the OAS (online, 6 February and 4 October) and with counterparts in the UNODC, the OECD Working Group on Bribery in International Business Transactions, and the EU (online, 27 April) – Secretariat
- ▶ Special "Uber" committee of the Parliament of the Brussels-Capital Region *Hearing of experts on lobbying and ethics* (online, 18 March) – Olivier GONIN, Head of delegation and Bureau member (Switzerland)
- ▶ Information sharing meeting with representatives of Expertise France in the context of France's anti-corruption Strategy (online, 28 March) – Secretariat
- ▶ Meeting with the Ministry of Foreign Affairs of the Netherlands Western Balkans Rule of Law Network (Strasbourg, 3 April) – Secretariat
- ▶ French Ministry of Justice | Réseau international Justice (RiJ) 5<sup>th</sup> Meeting of the RiJ *Rule of Law and fundamental rights – a common European priority* (Paris, 12 April) – Vincent FILHOL, former Head of delegation (France)
- ▶ Meeting with Ministers of the Flevoland region of the Netherlands (18 April) – Secretariat
- ▶ Colloquium *The fight against corruption in Europe: challenges and perspectives* organised by the Chair of Law and Business Ethics of CY Cergy Paris University (Paris, 25 May 2023) – António DELICADO, Head of delegation and Bureau member (Portugal)
- ▶ Interview for UkraineNews in connection with the publication of GRECO's 1<sup>st</sup> *Interim Fourth Round Compliance Report on Ukraine* – President
- ▶ Guest editorial for a thematic issue of EUCRIM on corruption, and an article for the annual ICC Integrity Book published by the International Chamber of Commerce – President

- ▶ Meeting with the High Judicial and Prosecutorial Council of Bosnia and Herzegovina concerning confidential counselling for judges and prosecutors – President
- ▶ Meeting with Mr Rémi LOISON, Policy Officer, Institutional Relations, Federation for European Education – FEDE (online, 1 June) – Secretariat
- ▶ Meeting of the multilateral consultation group *Political Finance Community of Practice* (online, 15 June) – Secretariat
- ▶ Meeting with Mr Elimanov ZHANAT, Chairman of the Financial Monitoring Agency of Kazakhstan, (Strasbourg, 19 June) – Secretariat
- ▶ 52<sup>nd</sup> Summer School of the René Cassin Foundation – International Institute of Human Rights, Special conference *The missions of the Council of Europe Commissioner for Human Rights and GRECO* (Strasbourg, 6 July) – Secretariat
- ▶ Meeting with the Permanent Anti-Corruption Unit of Quebec (*Unité permanente anticorruption du Québec – UPAC*) (online, 19 September) – Secretariat
- ▶ POLITICO Pro, Global Legal & Regulatory Club (GLRC) workshop *Whistleblower Protection 2024* (Brussels, 21 September) – Secretariat
- ▶ *Oxygono Cyprus Forum 2023* (Nicosia, 29-30 September) – Panagiota VATIKALOU, GRECO Bureau member (Greece)
- ▶ European Network of Public Ethics (ENPE) high-level conference *Strengthening Public Integrity and Countering Undue Influence in Democracies*, hosted by the Commission for the Prevention of Corruption of Slovenia (Ljubljana, 4-5 October) – President
- ▶ Interview for TSmedia – President
- ▶ European Partners Against Corruption | European contact-point network against corruption (EPAC/EACN) Annual Professional Conference and General Assembly (Dublin, 2-3 November) – Secretariat
- ▶ Election-Watch.EU Pre-Election Assessment Mission (PEAM) (online, 22 November) – Secretariat
- ▶ Centre for European Policy Studies (CEPS) roundtable *Fighting Corruption: Ukraine's Path to the EU* (Brussels, 8 December) – Secretariat
- ▶ European Law Students Association (ELSA) campaign webinar *Whistleblower Protection: the key to a just world* (Strasbourg, 9 December) – Secretariat
- ▶ [Statement](#) by GRECO's President on *corruption and environmental crime*, issued on the occasion of International Anti-corruption Day (9 December) – President
- ▶ Presentation on GRECO's work for students of the University of Strasbourg Masters programme Human Rights Law in a Changing World (Strasbourg, 13 December) – Secretariat

## Council of Europe

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- ▶ [10<sup>th</sup> Annual Meeting of the Secretary General with the Heads of the Monitoring and Advisory Bodies of the Council of Europe](#) (Strasbourg, 17 January 2023) – Vice-President
- ▶ Study visits for law faculty and other university students from Georgia (Strasbourg, 28 February, 12 June, 31 July and 7 November) – Secretariat
- ▶ Study visit for political science students from Strasbourg University (Strasbourg, 31 January) – Secretariat
- ▶ Study visit for Master Infocom students from the University of Lorraine (Strasbourg, 3 February) – Secretariat
- ▶ Launch of a new cooperation framework ([South Programme V](#)) between the Council of Europe and the Southern Mediterranean region (Lisbon, 13-14 March) – Secretariat
- ▶ Study visit for students from the University of Nîmes (Strasbourg, 25 April) – Secretariat
- ▶ Study visit for students from the School of Criminology and Criminal Justice, Northeastern University Boston (Strasbourg, 6 June) – Secretariat
- ▶ Meeting with representatives of the High Council of Justice of Ukraine (Strasbourg, 14 June) – Secretariat
- ▶ [Exchange of views and presentation of GRECO's General Activity Report 2022 to the Committee of Ministers](#) (1469<sup>th</sup> meeting of the Ministers' Deputies, 14 June) – President, Secretariat
- ▶ [Press launch](#) of GRECO's General Activity Report 2022 (Brussels, 15 June) – President, Secretariat

- ▶ Study visit for representatives of the Central Electoral Commission of the Republic of Moldova, the Centre for Continuous Electoral Training and the Central Electoral Council of Autonomous Territorial Unit of Gagauzia (Strasbourg, 15 June) – Secretariat
- ▶ Parliamentary Assembly of the Council of Europe (PACE), Committee on the Honouring of Obligations and Commitments by Member States of the Council of Europe (Monitoring Committee) joint hearing with the Committee on Political Affairs and Democracy on the *Financing of Political Parties* (Strasbourg, 21 June) – Secretariat
- ▶ Study visit for representatives of the Judicial and Prosecutorial Councils of Montenegro (Strasbourg, 28 June) – Secretariat
- ▶ Council of Europe project [Strengthening Democratic Citizenship Education in Albania](#) study visit for students of the Sami Frasheri high school in Tirana (Strasbourg, 29 June) – Secretariat
- ▶ Meeting with Mert KARTAL, Associate Professor of Government, St. Lawrence University and students from St. Lawrence University (Strasbourg, 10 July) – Secretariat
- ▶ Study visit for the Group of Former Deputies of the National Assembly of the French Republic (*Groupe des anciens Députés de l'Assemblée Nationale de la République Française*) (Strasbourg, 28 September) – Secretariat
- ▶ Study visit for judges and prosecutors from Croatia (Strasbourg, 28 September) – Secretariat
- ▶ Directorate General of Democracy and Human Dignity, Division of Elections and Participatory Democracy, meeting on Council of Europe developments and perspectives in the electoral field – [Electoral Cycle](#) (Strasbourg, 29 September) – Secretariat
- ▶ 29<sup>th</sup> Lisbon Forum *Human Rights, Environment and Economic Crimes: Youth at the forefront* (Lisbon, 16 October 2023) – Secretariat
- ▶ Meeting with representatives of the Qualification and Disciplinary Commission of Prosecutors, the Council of Prosecutors and the Office of the Prosecutor General of Ukraine (Strasbourg, 19 October) – Secretariat
- ▶ Study visit for high school students from Georgia (Strasbourg, 16 October) – Secretariat
- ▶ Meeting with study visitors from the Ministry of Justice and the Judiciary of Bosnia and Herzegovina (Strasbourg, 6 November) – Secretariat
- ▶ Study visit for judges from Sweden (Strasbourg, 16 November) – Secretariat
- ▶ CEPEJ study visit for judges from the *Ecole nationale de la magistrature* (ENM) of France (Strasbourg, 6 December) – Secretariat
- ▶ Venice Commission | Academy for European Human Rights Protection conference *Money and Democracy – an Uneasy Relationship* (Cologne, 7-8 December) – Yves-Marie DOUBLET, GRECO Evaluator (France)
- ▶ Presentation for members of the Registry of the European Court of Human Rights Protecting human rights by preventing corruption on GRECO's mandate, work and procedures and the inter-relationship between GRECO and the Court (Strasbourg, 14 December) – Secretariat

## **Appendix 6 – GRECO secretariat**

Directorate General Human Rights and Rule of Law

Directorate of Security, Integrity and Rule of Law

Livia STOICA BECHT, **Executive Secretary of GRECO, Head of the Economic Crime and Corruption Department**

Laura SANZ-LEVIA, **Deputy Executive Secretary of GRECO, Head of division**

### **Senior legal advisors**

Sophie MEUDAL-LEENDERS

David DOLIDZE

Stéphane LEYENBERGER

Ylli PEÇO

Anne WEBER

Tanja GERWIEN

Victoria CHERNIYCHUK

Bianca VALENTE, Assistant Administrator

Irma DZANKOVIC-ARSLAN, Personal assistant to the Executive Secretary and Head of Department

Study visitors: Hi Jin WOO (South Korea); Irene MARTINOLLI (Italy)

### **Central office and assistance**

Penelope PREBENSEN, Head of Central Office

Carla RIQUELME

Hayarpi ARSHAKYAN

## Appendix 7 – Membership (2023)<sup>15</sup>

### By date of accession

Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Germany, Greece, Iceland, Ireland, Lithuania, Luxembourg, Romania, the Slovak Republic, Slovenia, Spain, Sweden (founding states – 1 May 1999)

Poland (date of accession: 20 May 1999), Hungary (9 July 1999), Georgia (16 September 1999), United Kingdom (18 September 1999), Bosnia and Herzegovina (25 February 2000), Latvia (27 July 2000), Denmark (3 August 2000), United States of America (20 September 2000), North Macedonia (7 October 2000), Croatia (2 December 2000), Norway (6 January 2001), Albania (27 April 2001), Malta (11 May 2001), Republic of Moldova (28 June 2001), Netherlands (18 December 2001), Portugal (1 January 2002), Czechia (9 February 2002), Serbia (1 April 2003), Türkiye (1 January 2004), Armenia (20 January 2004), Azerbaijan (1 June 2004), Andorra (28 January 2005), Ukraine (1 January 2006), Montenegro (6 June 2006), Switzerland (1 July 2006), Austria (1 December 2006), Italy (30 June 2007), Monaco (1 July 2007), Liechtenstein (1 January 2010), San Marino (13 August 2010), Belarus (1 July 2006 – effective participation as of 13 January 2011; suspended as from 17 March 2022), Kazakhstan (1 January 2020).

15. The Russian Federation ceased to be a member of GRECO on 1 July 2023.





[www.coe.int](http://www.coe.int)

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.



Group of States against Corruption  
Groupe d'États contre la corruption

