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Addendum

First Evaluation Round

Addendum to the Compliance Report on Sweden

Adopted by GRECO
at its 28th Plenary Meeting
(Strasbourg, 9-12 May 2006)

I. INTRODUCTION

1. GRECO adopted the First Round Evaluation Report on Sweden at its 5th Plenary Meeting (11-15 June 2001). This report (Greco Eval I Rep (2001) 3E) was made public by GRECO, following authorisation by the Swedish authorities on 15 June 2001.
2. In the Compliance Report (Greco RC-I (2003) 11E), GRECO concluded that four recommendations (ii, iv, v and vi) had been implemented satisfactorily and three recommendations had been dealt with in a satisfactory manner (iii, vii and viii), whereas one recommendation had been partly implemented (i). Consequently, GRECO requested additional information on the implementation of recommendation i. The Swedish authorities submitted additional information on 4 November 2005 and on 20 April 2006.
3. Pursuant to Rule 31, paragraph 9.1 of GRECO's Rules of Procedure the objective of the present Addendum to the First Round Compliance Report is to appraise the implementation of recommendation i. in the light of the additional information referred to in paragraph 2.

II. ANALYSIS

Recommendation i

4. *GRECO recommended Sweden to raise the awareness of public officials, particularly those more likely to be in contact with corrupt practices, about the need to remain vigilant, to report suspicions of corruption in accordance with agreed procedures and to contribute to the efforts of law enforcement authorities aimed at the detection of corruption offences.*
5. GRECO recalls that in the compliance report it is acknowledged that Sweden has in place a good system for educating and training public officials with a potential for awareness raising of public officials concerning matters relating to corruption. GRECO also took note of an awareness programme limited to the particular area of arms trading. However, no concrete measures in the sense of raising public officials' awareness about corruption, i.e. the need to remain vigilant, to report suspicions of corruption in accordance with agreed procedures and to contribute to the efforts of law enforcement authorities aimed at the detection of corruption, had been reported. For that reason, GRECO concluded that recommendation i had been only partly implemented.
6. The Swedish authorities have reiterated its previous position that corruption poses a serious threat to democratic societies and that the public's confidence in the public administration is of utmost importance, that it is vital to increase the consciousness of public employees in respect of ethical behaviour and that there is a need to curb corruption. The authorities have recalled that the responsibility for the implementation of such questions in the various state agencies mainly lies with the heads of the agencies and that the Government's role is limited to defining the objectives of the authorities and to monitor how the objectives have been implemented.
7. More particularly, as a concrete response to recommendation i, the authorities have reported that two main projects have been initiated; the first concerning all domestic public employees and the second primarily aimed at public employees in the foreign service.
8. The first project is run by the Government Offices (Ministry of Finance) in co-operation with the Federation of County Councils and the Federation of Municipalities. This joint project was initiated in 2005 and the purpose was, *inter alia*, to raise public officials' awareness about questions

relating to corruption. A guidance document on the subject of corruption aimed at all public employees at governmental, county and municipality levels has been developed. This document contains, in addition to a general introduction to the phenomenon of corruption and its particularities, information about relevant legislation and practice and discusses situations where particular caution is called for. The document, which also deals with conflicts of interest, encourages public employees to report situations where attempts of unjust influencing over public employees have been discovered (whistleblowing). The guidance document, which at the adoption of this report, was in a draft version (dated 6 March 2006), is planned to be publicly launched on 2 June 2006 and subsequently distributed – as a leaflet - to public employees at state, county and municipal levels.

9. The second project referred to has been developed within the Ministry for Foreign Affairs: The Government Offices' Ethical Guidelines have been supplemented with "Ethical Guidelines for Service Abroad" and a working paper entitled "Fight Corruption!" has been drafted as a basis for increasing knowledge about corruption. The paper "Fight Corruption!" provides a general introduction to corruption and its negative impact in various areas (competition, investment, democracy etc), legislation and law enforcement initiatives as well as Swedish participation in relevant international fora. An Action Plan, containing priority activities, such as seminars and training of staff, as well as further action through international organisations of which Sweden is a member, was adopted on 3 June 2005. These documents have been distributed to all heads of departments at the Foreign Office in Stockholm as well as to heads of missions abroad (7 June 2005).
10. GRECO took note of the information provided and was pleased that a massive work to raise the general awareness about corruption and to act against this phenomenon had been reported. The first project presented, covering the public service in Sweden, at central, regional and local levels appears to be promising and Sweden should be commended for its efforts in launching such a project, which crosses traditional administrative borders, in order to provide a uniform approach throughout the public service. GRECO noted, however, that the project, although at an advanced stage, has not yet been formally adopted, but is about to be launched in a very near future.
11. GRECO also welcomes the second project, concerning public officials in the foreign service. The paper "Fight Corruption!" is particularly promising as a general introduction to corruption and related implications. GRECO noted that the Action Plan includes a long list of measures to be addressed, such as increased awareness, preventive measures and action through international organisations of which Sweden is a member. Concerning this latter point, GRECO noted with concern that the Council of Europe and GRECO were not mentioned, despite Swedish commitments with regard to Council of Europe legal instruments concerning corruption, GRECO's monitoring as well as the technical co-operation activities carried out by the Council of Europe.
12. GRECO concludes that recommendation i has been dealt with in a satisfactory manner.

CONCLUSION

13. In addition to the conclusions in the First Round Compliance Report on Sweden and in view of the above, GRECO concludes that Sweden has dealt with recommendation i in a satisfactory manner.
14. The adoption of the present Addendum to the Compliance Report terminates the First Evaluation Round compliance procedure in respect of Sweden. The Swedish authorities may, however, wish

to inform GRECO of further development with regard to the formal adoption of the first project referred to in the reply to recommendation i.