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Checklist on preventing corruption and promoting integrity at local and regional levels

Committee on Governance, Civic Engagement and the Environment (Governance Committee)

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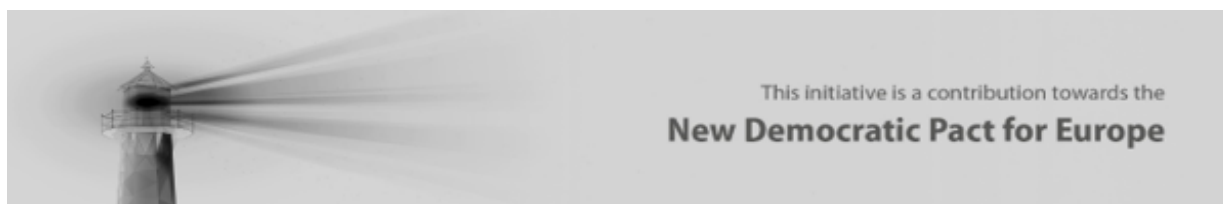
Draft resolution (for vote)	3
Draft recommendation (for vote)	5
Explanatory memorandum (for information)	7

Summary

The Checklist for preventing corruption and promoting integrity at local and regional levels has been developed in close alignment with Council of Europe anti-corruption standards and the Group of States against Corruption (GRECO) Sixth Evaluation Round. The document recognises that corruption at the sub-national level – including bribery, nepotism, misuse of funds, and manipulation of administrative processes – undermines institutional trust, threatens human rights, diminishes service quality and weakens democratic governance. It underscores the importance of robust institutional frameworks and a culture of integrity, taking into account specific vulnerabilities such as limited resources and weaker oversight mechanisms within local and regional bodies.

Designed as a practical self-assessment tool, the Checklist outlines targeted criteria within seven key areas: anti-corruption strategies and risk assessment, standards of conduct, recruitment and remuneration, managing conflicts of interest, transparency and public engagement, public procurement and use of resources across the election cycle. Each section presents guiding implementation questions. Adoption and systematic use of the Checklist by local and regional authorities and their associations should reinforce accountability, enhance transparency, and foster ethical leadership at the grassroots level. By establishing a coherent integrity framework and promoting consistent application of best practices, the Checklist aims to reinforce public trust in democratic governance across the Council of Europe's member states, from the local and regional level up.

1. L: Chamber of Local Authorities / R: Chamber of Regions.
EPP/CCE: European People's Party Group in the Congress.
SOC/G/PD: Socialist, Greens and Progressive Democrats Group.
ILDG: Independent and Liberal Democrat Group.
ECR: European Conservatives and Reformists Group.
PFE: Patriots for Europe Group
NR: Members not belonging to a political group of the Congress.



DRAFT RESOLUTION²

1. The Congress of Local and Regional Authorities of the Council of Europe ("the Congress") refers to:
 - a. the Council of Europe Reykjavik Declaration "United around our values", and in particular to the Reykjavik Principles for Democracy (Appendix III);
 - b. the Code of Conduct of Congress members as enshrined in the Congress Charter and provided for in the Rules and Procedures;
 - c. Congress Resolution 444 (2019) and Recommendation 435 (2019) "The protection of whistleblowers – Challenges and opportunities for local and regional government";
 - d. Congress Resolution 441 (2019) and Recommendation 428 (2019) "Fighting nepotism within local and regional authorities";
 - e. Congress Resolution 433 (2018) "European Code of Conduct for all Persons Involved in Local and Regional Governance";
 - f. Congress Resolution 434 (2018), Recommendation 423 (2018) "Conflicts of interest at local and regional levels";
 - g. Congress Resolution 435 (2018), Recommendation 424 (2018) "Transparency and open government";
 - h. Congress Resolution 421 (2017), Recommendation 405 (2017) "Making public procurement transparent at local and regional levels";
 - i. Congress Resolution 402 (2016) "The misuse of administrative resources during election processes";
 - j. the Council of Europe Civil Law Convention on Corruption (ETS No. 174) and the Criminal Law Convention on Corruption (ETS No. 173);
 - k. the Committee of Ministers' Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption;
 - l. the monitoring reports of the Group of States Against Corruption (GRECO) and the recommendations of its sixth evaluation round on Preventing corruption and promoting integrity at the sub-national level;
 - m. the United Nations Convention against Corruption (UNCAC) and especially its Chapter II "Preventive measures.
2. The Congress points out that:
 - a. corruption destroys citizens' trust in democratic institutions and undermines the rule of law;
 - b. democracy and institutional legitimacy require a culture of integrity and accountability at all levels of governance;
 - c. ethical leadership coupled with effective integrity and anti-corruption systems, transparency and independent oversight is especially important at local and regional levels;
 - d. the values and tools to prevent corruption are key features defining resilient democracies.
3. In light of the above, the Congress calls on the local and regional authorities of Council of Europe member States to:
 - a. adopt and implement the checklist on preventing corruption and promoting integrity, paying proper regard to all seven points and their key criteria, in line with European and other international standards and best practices for human rights, democracy and the rule of law;

² Approved by the Governance Committee on 11 June 2026.

- b. ensure to the greatest extent possible that the checklist is implemented fully across all areas of local and regional authority competence and practice;
 - c. treat the checklist as a living tool, subject to regular review and revision in response to evolving regulations, operational challenges, best practice developments, and feedback from stakeholders at national and European levels;
 - d. share lessons learned, good practices, and implementation challenges with peers at regional, national, and European levels to foster a learning community, as encouraged by Congress standards and GRECO recommendations; disseminate experiences through structured peer exchanges and digital platforms wherever possible.
4. The Congress calls on local and regional authorities and their national associations to take account of this resolution and the accompanying explanatory memorandum, on this specific issue.
5. The Congress asks its statutory bodies to take the present resolution into account in their activities.

DRAFT RECOMMENDATION³

1. The Congress of Local and Regional Authorities of the Council of Europe (“the Congress”) refers to:
 - a. the Council of Europe Reykjavik Declaration “United around our values”, and in particular to the Reykjavik Principles for Democracy (Appendix III);
 - b. the Code of Conduct of Congress members as enshrined in the Congress Charter and provided for in the Rules and Procedures;
 - c. Congress Resolution 444 (2019) and Recommendation 435 (2019) “The protection of whistleblowers – Challenges and opportunities for local and regional government”;
 - d. Congress Resolution 441 (2019) and Recommendation 428 (2019) “Fighting nepotism within local and regional authorities”;
 - e. Congress Resolution 433 (2018) “European Code of Conduct for all Persons Involved in Local and Regional Governance”;
 - f. Congress Resolution 434 (2018), Recommendation 423 (2018) “Conflicts of interest at local and regional levels”;
 - g. Congress Resolution 435 (2018), Recommendation 424 (2018) “Transparency and open government”;
 - h. Congress Resolution 421 (2017), Recommendation 405 (2017) “Making public procurement transparent at local and regional levels”;
 - i. Congress Resolution 402 (2016) “The misuse of administrative resources during election processes”;
 - j. the Council of Europe Civil Law Convention on Corruption (ETS No. 174) and the Criminal Law Convention on Corruption (ETS No. 173);
 - k. the Committee of Ministers’ Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption;
 - l. the monitoring reports of the Group of States Against Corruption (GRECO) monitoring reports and the recommendations of its sixth evaluation round on Preventing corruption and promoting integrity at the sub-national level;
 - m. the United Nations Convention against Corruption (UNCAC) and especially its Chapter II “Preventive measures.
2. The Congress points out that:
 - a. corruption destroys citizens’ trust in democratic institutions and undermines the rule of law;
 - b. democracy and institutional legitimacy require a culture of integrity and accountability at all levels of governance;
 - c. ethical leadership coupled with effective integrity and anti-corruption systems, transparency and independent oversight is especially important at local and regional levels;
 - d. the values and tools to prevent corruption are key features defining resilient democracies.
3. In the light of the above, the Congress calls on the Committee of Ministers to invite the respective national authorities of the member States of the Council of Europe to:
 - a. ensure that local and regional authorities have the legal support and earmarked financial, and technical means necessary to implement the checklist;

³ Approved by the Governance Committee on 11 June 2026.

- b. support local and regional authorities in their efforts to implement anti-corruption measures aligned with the United Nations Convention against Corruption, Council of Europe anti-corruption standards and best practices, and GRECO recommendations – particularly those emerging from the sixth evaluation round focused on subnational government;
- c. actively involve local and regional authorities and their associations in the design and implementation of national anti-corruption policies.

EXPLANATORY MEMORANDUM

I. Introduction	8
II. Checklist	10
1. Anti-corruption strategies and risk assessment	10
2. Standards of conduct	12
3. Recruitment and remuneration	13
4. Managing conflicts of interest	15
5. Transparency and public engagement	17
6. Public procurement	18
7. Use of resources across the election cycle	20
III. Conclusions.....	22
Appendix 1.. Overview of relevant international and Council of Europe anti-corruption standards	23
Appendix 2. Reference documents	30

I. Introduction⁴

1. Surveys consistently show that trust in institutions and elected representatives tends to be highest at the local level. However, corruption, in its many forms, remains a widespread challenge that erodes public trust, undermines the integrity of institutions, and impedes sustainable development wherever it occurs. While high-profile scandals at the national level often capture media and political attention, corruption at local and regional levels is equally destructive. The local level is where citizens most directly interact with government - through the provision of essential services and the management of public resources. When these processes are compromised by corruption or unethical behaviour, people directly feel the consequences in their everyday lives, with lower quality of services, inequitable resource distribution, and widening socio-economic gaps. Furthermore, corruption and unethical practices weaken economic development and social cohesion, undermine effective governance and ultimately corrode human rights, democracy and the rule of law. The active involvement of sub-national authorities is therefore essential to put in place the measures that tackle corruption effectively. Clear rules and guidance on prevention of corruption and ensuring integrity are therefore pivotal for local and regional authorities' capacity to ensure transparent and accountable governance.⁵

2. Corruption at the local and regional levels can set in due to the lower level of scrutiny that is often found at the national level. It may take the form of bribery in municipal contracts, nepotism in local council administration appointments, misuse of regional development funds, or manipulation of permits and licenses. Such practices erode community confidence in governance, discourage private investment and distort fair political competition. Moreover, when corruption is widespread at the sub-national level, it can weaken the country's broader anti-corruption efforts, making reforms more difficult to implement and sustain.⁶

3. While various international organisations and treaties have provided differing definitions of corruption, this checklist uses the definition contained within the Civil Law Convention on Corruption of the Council of Europe (ETS No. 174, Article 2): "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".

4. The term "public official" shall be interpreted broadly, in line with the standards of the Council of Europe and the United Nations,⁷ as well as guidance from bodies such as Group of States against Corruption (GRECO), monitoring the compliance with the Council of Europe's anti-corruption instruments, and the Organisation for Economic Co-operation and Development (OECD). It encompasses any person holding an elected, appointed, or administrative position at local and regional levels, as well as any person exercising a public function, managing public resources, or providing public services. Where appropriate, under applicable law, this definition may extend to private persons entrusted with public functions. With this in mind, it is important to note that anti-corruption strategies at the local and regional levels may adapt these definitions to fit the administrative, cultural, and legal contexts of each jurisdiction.

5. The European Charter of Local Self-Government (ETS No. 122) establishes a framework requiring Council of Europe Member States to uphold key principles in local governance. Specifically, it mandates that local authorities act in the best interests of their populations (Article 3), requires that employment conditions for local government staff facilitate the recruitment of qualified personnel, based strictly on merit and competence (Article 6). Moreover, it stipulates that the conditions of office for elected representatives must guarantee their ability to perform their functions freely and it provides for appropriate financial compensation and clear legal definitions regarding the incompatibility of certain activities with local elective office (Article 7).⁸ Further, it permits administrative supervision of local authorities, limited to the verification of legality and compliance with constitutional or statutory requirements, and proportionate to the legitimate interests protected (Article 8). The appendix to this report provides an extensive overview of relevant international anti-corruption standards and best practices.

4 Report prepared with the contribution of Prof. MMag. Dr Christina Binder, Expert, Member of the Group of Independent Experts on the European Charter of Local Self-Government (GIE).

5 Explanatory memorandum to the European Urban Charter III, CG(2023)45-20, para 57.

6 Congress report on Preventing corruption and promoting public ethics at local and regional levels, CG31(2016)06, paras 1-6.

7 Council of Europe Criminal Law Convention on Corruption (ETS No. 173), Art 1 (a); Recommendation No. R (2000) 10 of the Committee of Ministers to Member States on codes of conduct for public officials, Appendix Art 2; UNCAC Article 2a.

8 See especially, Congress of Local and Regional Authorities, *A Contemporary Commentary by the Congress on the Explanatory Report to the European Charter of Local Self-Government*, CG-FORUM (2020)02-05prov, 7 December 2020, <https://rm.coe.int/contemporary-commentary-by-the-congress-on-the-explanatory-report-to-t/1680a06149>, para.112.

6. By choosing “preventing corruption and promoting integrity at the sub-national level” for the theme of its 6th Evaluation Round, GRECO is again breaking new ground and focusing, for the first time, on authorities at local, regional or other decentralised level (the “sub-national authorities”). The GRECO reports and recommendations of the [Sixth Evaluation Round](#) provide valuable guidance for local and regional anti-corruption policies. They build on previous rounds and focus on anticorruption/integrity policy and risk management, standards of conduct and ethics, conflicts of interest, transparency, access to information and public participation as well as control mechanisms, oversight and accountability.⁹

7. Awareness is growing, both internationally and nationally, about the local and regional dimensions of corruption. The Congress of Local and Regional Authorities, among others, has developed targeted tools to prevent corruption and promote integrity. These, and this checklist, have been developed with the understanding that successful anti-corruption strategies combine legal clarity¹⁰, institutional capacity¹¹, and civic engagement, while ensuring transparency in decision-making and financial management.¹² It is equally important to foster a culture of integrity in local administrations, so that ethical conduct is both expected and rewarded.¹³ Promoting “integrity systems” at grassroots level, where oversight bodies, civil society organisations, media, and informed citizens all play active roles, is essential and complements top-down reforms.¹⁴

8. Recognising that corruption distorts the proper performance of public duties and undermines institutional integrity, anti-corruption efforts must be set within a robust rule of law framework. As set out by the Venice Commission, the rule of law is a foundational principle underpinning anti-corruption efforts and the proper functioning of democratic institutions. This means that public officials must act in accordance with the law, but also that laws themselves must be clear, accessible, and apply equally to all. Core components of the rule of law include legality, legal certainty, prohibition of arbitrariness, access to justice, respect for human rights, and non-discrimination.¹⁵ In the specific context of corruption, the rule of law requires effective legal safeguards against abuse of power, and to ensure transparent and accountable law-making, and robust mechanisms for the prevention, detection, and sanctioning of corrupt practices. Regardless of the level of governance, corruption undermines the rule of law by fostering arbitrariness, eroding equality before the law, and weakening public trust in institutions. Thus, anti-corruption measures must be embedded within a broader commitment to the rule of law and must be fair, consistent, and respect human rights.¹⁶

9. In synergy with the Venice Commission, the Congress has developed its own strategy for the rule of law at local and regional levels.¹⁷ It aims to mainstream the rule of law within all Congress activities, enhance awareness and capacity among subnational governments, and foster integrity and accountability. The strategy highlights the crucial role of local and regional authorities in upholding legal standards and tackling corruption. Key measures include providing technical and methodological support to local authorities, strengthening anti-corruption mechanisms, promoting transparency and ethical standards, and developing clear indicators for evaluating rule of law implementation. The strategy also emphasises partnerships with bodies such as GRECO and the Venice Commission to address corruption and integrate multilevel perspectives into rule of law assessments, ensuring that local and regional authorities are empowered, as both actors and guarantors in the fight against corruption and the protection of democratic values.¹⁸

10. Generally, the Congress work underscores the significance of local and regional levels in addition to the national anti-corruption efforts. The distinction between national and local/regional anti-corruption levels is not merely a matter of scale, but of structure, resources, and the nature of risks. Contrary to the central/national level of government, sub-national governments often present a more fragmented and challenging environment. Local governments often handle smaller but more frequent procurement contracts, often with less standardised procedures and limited resources. Oversight, internal controls and audit tend to be weaker, and local officials often exercise significant discretion, increasing

9 See GRECO Evaluations, <https://www.coe.int/en/web/greco/evaluations>.

10 Venice Commission Rule of Law Checklist, 2016; Congress Strategy on the Rule of Law at Local and Regional Levels (2025-2028), 2025, para 5.

11 Congress report on Preventing corruption and promoting public ethics at local and regional levels, CG31(2016)06, para 58.

12 Congress report on Transparency and open government, CG35(2018)14.

13 See e.g. Congress Resolution 433(2018) European Code of conduct for all persons involved in local and regional governance.

14 Congress report on Preventing corruption and promoting public ethics at local and regional levels, para 53.

15 Venice Commission Rule of Law Checklist, 2016.

16 Ibid.

17 Congress Resolution 517(2025) “Congress Strategy on the Rule of Law at Local and Regional Levels (2025-2028)”.

18 Ibid.

vulnerability to personal networks, informal influence, and favouritism.¹⁹ Nepotism and conflicts of interest are harder to spot and report.²⁰ Whistle-blower protections are harder to guarantee in close-knit communities.²¹ Leadership commitment to integrity and locally tailored training are especially critical as local leaders set the tone for integrity.²² In sum, local and regional authorities face specific challenges and complexities and need context-sensitive solutions tailored to their circumstances.

11. Against this background, the present Congress checklist provides criteria and guidance to help prevent corruption and promote integrity at the local and regional levels. It is structured around seven sections. For each section, relevant guiding criteria and questions are set out to facilitate practical implementation. The appendices provide a comprehensive overview of international and Council of Europe standards and best practices in the anti-corruption field as well as the reference documents for each section of the report.

12. The application of this checklist should provide practical means by which local and regional authorities, local/regional leaders, policymakers, and oversight bodies can build transparent, accountable, and resilient governance structures that strengthen public trust and contribute to long-term social and economic wellbeing at the local and regional level in the Council of Europe member States.

II. Checklist

13. The checklist is organised into seven subsections, each focusing on a specific area identified as particularly relevant for preventing and combating corruption at local and regional levels. These areas are: anti-corruption strategies and risk assessment; integrity rules and codes of conduct;²³ recruitment, remuneration, promotion and dismissal (with emphasis on preventing nepotism and favouritism)²⁴; conflict of interest management²⁵; transparency, access to information, and community engagement²⁶; public procurement²⁷; and the misuse of administrative resources during local and regional elections. Each subsection includes guiding questions, sub-questions, and additional criteria to facilitate practical implementation. Unless otherwise specified, the normative basis for these questions is primarily drawn from thematic Congress reports published within the series “Preventing corruption and promoting public ethics at local and regional levels.”²⁸

14. Each subsection starts with a brief thematic introduction, with a description of the issue at hand, followed by the checklist. For each area of the checklist, an overarching question sets the main goal and precedes sub-questions that provide concrete elements that detail the implementation of the given criteria. The *rationale* behind this approach is that since corruption is rarely simple, it is necessary to have multiple criteria to identify it and sharpen the awareness of those in a position to do so.

1. Anti-corruption strategies and risk assessment

15. Local and regional authorities should adopt and implement a comprehensive integrity policy and/or strategy (or other similar document) providing for clear standards of ethical conduct, accountability, and transparency. This policy should be formalised through an official framework or strategy and be subject to regular review and updated to reflect evolving risks and best practices. The integrity policy should explicitly cover measures for prevention, detection, and management of corruption risks and promote a culture of integrity. Whistle-blower protection is an essential component of an effective integrity policy.

16. As a foundational component of the integrity policy, authorities must conduct systematic and periodic risk assessments to identify, prioritise, and address areas most susceptible to corruption and ethical violations. Risk assessments should encompass all high-risk processes, including but not limited

19 Congress report on Making public procurement transparent at local and regional levels, CG27(2017)13, pp 20-26.

20 Congress report on Fighting nepotism within local and regional authorities, CG36(2019)16, pp 16-22.

21 Congress report “The protection of whistleblowers: Challenges and opportunities for local and regional government”, CG36(20), pp 16-20.

22 Congress European Code of Conduct for all persons involved in Local and Regional governance, 2018, p 27; Congress report on Preventing corruption and promoting public ethics at local and regional levels, 2016, para 58.

23 Congress European Code of Conduct for all persons involved in Local and Regional governance, 2018.

24 Congress report on Fighting nepotism within local and regional authorities, 2019.

25 Congress report on Conflicts of interest at local and regional levels, CG35(2018)13.

26 Congress report on Transparency and open government, 2018.

27 Congress report on Making public procurement transparent at local and regional levels, 2017.

28 Note that further relevant international and European standards and best practices of relevance for the respective criteria at stake are listed in an Annex.

to procurement, recruitment, financial management, and interactions with external stakeholders. The risk assessment process should involve responsible officials, include consultation with relevant stakeholders, and be documented in a manner that supports subsequent monitoring and mitigation actions.

Key criteria:

- **Comprehensive policy:**
 - o Has a documented and publicly available anti-corruption and integrity policy or strategy been adopted at the local / regional level?
 - o Does the policy set clear standards and objectives for all those entrusted with public office or public functions?
- **Leadership commitment:**
 - o Has senior leadership (mayor, council, executive management) formally approved and actively promoted the integrity policy, demonstrating visible accountability for implementation?
- **Inclusive and aligned approach:**
 - o Does the policy address human rights considerations, such as gender equality and non-discrimination, as well as sustainability considerations (e.g. for procurement)? Does it cover anti-fraud and all forms of misconduct?
 - o Is the integrity strategy consistent with, and does it support, national anti-corruption frameworks?
- **Review and risk assessment:**
 - o Is the effectiveness of the integrity policy and strategy regularly evaluated and updated?
 - o Are systematic, documented risk assessments conducted regularly to identify and mitigate integrity and corruption risks across all functional areas?
 - o Do risk assessments cover in particular public procurement, budget, urban planning and development, public services, municipally-controlled enterprises?
 - o Is there a mechanism for assessing the integrity risks of third parties, namely contractors, service providers and partners?
- **Stakeholder participation:**
 - o Are elected representatives, staff, service providers, and civil society actively involved in policy development, risk assessment, and monitoring?
- **Oversight and digital tools:**
 - o Is oversight provided by independent bodies, including civil society representatives?
 - o Are digital platforms, including e-procurement, e-disclosure, and AI-supported risk mapping, used to support integrity management? Is digital literacy and integrity training provided?

- **Transparency and reporting:**
 - o Are contracts, budgets, and audit results published proactively and in accessible, machine-readable formats?
 - o Is there regular public reporting on integrity policy implementation and risk assessment outcomes?
- **Whistle-blower protection:**
 - o Are secure channels in place for confidential reporting of corruption concerns, with robust protection against retaliation?
- **Internal control and audit:**
 - o Are internal controls and independent audits in place for financial and integrity management practices?

17. This integrity policy and proactive risk management approach underpins the effective implementation of all subsequent anti-corruption controls within the checklist.

2. Standards of conduct

18. Codes of conduct are essential ethical benchmarks in public service, guiding officials and all participants in local and regional governance on appropriate behaviour in their daily functions. By setting clear standards for conduct, these codes foster a culture of accountability, integrity, honesty, and responsibility, building public trust in those who serve and strengthening the connection between citizens and policy-makers. Importantly, codes of conduct inform the public of the standards they should expect from public officials and provide reference points for oversight bodies tasked with ensuring ethical compliance.

19. Article 8 of the United Nations Convention against Corruption (UNCAC) underlines the need to promote integrity among public officials as a fundamental measure against corruption. States Parties are encouraged to adopt codes of conduct that guide officials in performing their duties with honour and propriety, and to reference relevant international instruments, such as the International Code of Conduct for Public Officials. To support detection and prevention of corruption, mechanisms for reporting suspected misconduct should be established, allowing public officials to inform appropriate authorities through secure channels.

20. It is recognised that no single model code can address every ethical dilemma; rather, codes institutionalise expectations regarding principled behaviour and the means to protect and enforce those principles. Effective codes address relationships among actors, define duties and responsibilities, and provide guidance for both individual and collective behaviour. In particular, attention is paid to financial interests, proper use of official information, and the handling of potential conflicts of interest. Leadership commitment, comprehensive policy adoption, enforcement, and regular updates are critical to the enduring effectiveness of ethical standards.²⁹

21. International standards and best practices, including Section 4, Principle 1 of the European Urban Charter III, call for the adoption and implementation of integrity policies supported by risk management, organisational ethics management, and robust control mechanisms. The Charter emphasises promoting ethical leadership, drafting and promoting codes of conduct, and providing counselling and guidance on ethical dilemmas and integrity risks.

²⁹ It is important to remember that codes of conduct are just one of several tools within a broader integrity policy framework. National governments or associations of local and regional authorities are responsible for adapting and detailing the principles of these codes within their own legislation or relevant ethical guidelines. Through these measures, codes of conduct reinforce ethical governance and help maintain public confidence in local and regional authorities. Congress European Code of Conduct for all Persons involved in Local and Regional Governance, 2018, pp 4-9.

22. Congress Resolution 433 (2018) encourages local and regional authorities to adopt the European Code of Conduct for All Persons Involved in Local and Regional Governance, or alternatively, to develop similar codes in consultation with national governments. Additionally, it promotes comprehensive educational programmes and advisory services to assist staff in identifying and managing ethical risks. National associations are invited to contribute by translating and disseminating codes of conduct and supporting the design and implementation of integrity education and training, thereby raising awareness among both public officials and citizens of expected behavioural standards in local and regional governance.

Key criteria:

- **Codes of conduct:**
 - o Are comprehensive, regularly updated codes of conduct or integrity standards adopted and made publicly available for all public officials and elected representatives?
- **Elected representatives:**
 - o Do codes include provisions specific to elected officials, such as transparency, prioritising public interest, and ethical relations with lobbyists?
- **Promotion, training and guidance:**
 - o Are formal procedures, awareness campaigns, and disciplinary mechanisms in place to implement the codes?
 - o Do all officials periodically receive updated integrity and ethics training?
 - o Is confidential, accessible advice on ethical dilemmas and integrity risks provided both for appointed officeholders and elected representatives?
- **Control mechanisms, oversight and accountability:**
 - o Are there regular internal integrity controls and independent external audits in place, and are audit findings and recommendations systematically followed up and implemented?
 - o Is there a designated integrity/ethics officer, committee, or independent body responsible for oversight of integrity and compliance systems?
 - o Does the oversight officer or body have sufficient independence, resources, and authority to investigate suspected breaches by anyone covered by the codes, and to recommend or apply proportionate disciplinary or statutory measures?
 - o Are clear, confidential channels for reporting suspected integrity breaches in place, with effective safeguards for whistleblowers and others reporting in good faith?
 - o Are summaries or statistics on audits, investigations, decisions, and sanctions regularly published to ensure transparency and public accountability, while protecting personal data as required?

3. Recruitment and remuneration

23. Nepotism and favouritism undermine the proper functioning of local self-government, jeopardising impartial service delivery and eroding public trust in authorities' commitment to the public good. At local and regional levels, such practices hinder fair, efficient and effective governance, damage perceptions

of legitimacy, and discourage public participation. Addressing these issues is vital to restore confidence and improve governance.³⁰

24. In accordance with UNCAC and Council of Europe standards and best practices, local and regional authorities must establish robust legal, institutional, and administrative frameworks covering recruitment, hiring, retention, promotion, dismissal, and retirement. These frameworks should be grounded in efficiency, transparency, merit, equity, and objective criteria. Comprehensive procedures must be established and made easily accessible for applicants and staff, supported by standardised examination systems and clear explanations of all recruitment and selection processes.

25. Effective anti-nepotism and anti-favouritism practices require regular audits of human resource management, adherence to codes of conduct and integrity standards, and clear prohibitions against officials recommending or hiring family members or exerting improper influence. Mandatory disclosure of any present or past relationships between selection panel members and candidates must be required, and impartiality must be protected by excluding officials from processes where conflicts of interest exist. Appropriate and deterrent disciplinary measures must be imposed for breaches of integrity, misconduct, or failure to disclose conflicts. Independent oversight bodies – including integrity bureaus, ethics committees, and audit agencies – should be established to investigate suspected misconduct and monitor compliance, guaranteeing the independence of officials in audit and monitoring institutions.

26. Reporting channels must be instituted for detecting favouritism and conflicts of interest, with robust protection for whistle-blowers who report nepotism. Administrative cultures should be strengthened to eliminate tolerance for favouritism in all forms, and cooperation with civil society and stakeholder groups should be encouraged to support reform and share best practices.

27. Regular and specialised training, adequate remuneration and transparency in selection criteria are critical. Professional development through seminars, workshops, and peer exchanges should foster awareness of rights, responsibilities, and duties. Efficient human resource management systems and mechanisms to monitor both the implementation and effectiveness of anti-nepotism legislation – at national, regional, and local levels – must be maintained. Finally, authorities are encouraged to promote national and international cooperation, exchange experiences, and engage constructively with civil society and think tanks to further strengthen integrity in governance.

Addressing these risks is essential to restoring confidence and improving governance outcomes.

Key criteria:

- **Merit-based rules and transparency:**
 - o Are recruitment, promotion, and dismissal rules public, merit-based, objective, and competitive?
 - o Are integrity and background checks systematically conducted prior to hiring or appointment, especially for sensitive posts?
 - o Are there clear and effective safeguards against nepotism and favouritism, and are related anti-nepotism and anti-favouritism policies proactively communicated and made accessible to staff and the public?
 - o Are comprehensive records of recruitment, promotion, and dismissal decisions maintained to enable subsequent audits and ensure transparency?
- **Impartiality and oversight:**
 - o Are impartial and diverse recruitment and promotion panels required, with mandatory recusal in conflict-of-interest situations?
 - o Are panel compositions inclusive of gender, minority, and, where appropriate, independent external members to reduce bias?

³⁰ Congress report on Fighting nepotism within local and regional authorities, 2017, pp 5-10.

- o Are all recruitment processes standardised, publicly explained, and subject to regular audit?
- **Reporting and prohibitions / restrictions:**
 - o Are confidential channels and independent bodies in place for reporting suspected nepotism, favouritism, or conflicts of interest?
 - o Are all candidates, panel members, and decision-makers required to disclose any relevant personal, familial, or professional relationships before recruitment or promotion decisions, with disclosures documented and reviewed?
 - o Is there a formal prohibition on the appointment or influence in employment of family members or close associates?
 - o Are mechanisms in place for timely detection, reporting, and investigation of suspected breaches during the recruitment process?
- **Transparency in outcomes:**
 - o Are major staff appointments, panel compositions, and remuneration statistics published, including data on gender and minority representation?
 - o Is feedback on recruitment processes and final decisions systematically provided to all applicants?
- **Remuneration:**
 - o Are pay and allowances for all staff and elected representatives governed by clear, fair, and transparent rules?
 - o Is remuneration regularly benchmarked and reviewed to ensure competitiveness, fairness, and the prevention of unethical inducements?
- **Independent monitoring and training:**
 - o Are independent bodies tasked with monitoring compliance with integrity rules and is regular, practical training on integrity and anti-nepotism delivered to all staff involved in recruitment?
 - o Are regular, targeted audits and reviews of recruitment and human resources practices carried out, and are findings systematically used to improve procedures and mitigate integrity risks?

4. Managing conflicts of interest

28. Conflicts of interest represent a fundamental risk of public office being abused for personal gain. Such risks have always posed challenges at all levels of government, particularly as public officials frequently occupy multiple roles. Contemporary factors - including increased managerial discretion, greater mobility between public and private sectors, and the blurring boundaries between public and private life - further intensify these challenges. Societal developments such as individualisation, digitalisation, and globalisation increase the complexity of managing conflicts of interest and maintaining integrity in public service. Especially the position of elected representatives who sit on the governing bodies of companies owned or controlled by their local authority carries with it the potential for conflicts of interest.

29. International standards and best practices provide clear guidance on this matter. Article 7.4 of the UNCAC calls on States Parties to adopt, maintain, and strengthen systems that enhance transparency and prevent conflicts of interest, promoting integrity and accountability within the public service. Article 8.5 further encourages the establishment of measures requiring public officials to disclose information

about their outside activities, employment, investments, assets, and significant gifts, both before and during service, to identify and manage potential conflicts. These requirements are reinforced by the European Urban Charter III and Congress recommendations, which underline the necessity of proactive disclosure, timely management, and clear procedures for identifying, resolving, and documenting conflicts of interest. In its Sixth Evaluation Round, GRECO has issued specific recommendations to enhance the prevention and resolution of conflicts of interest, including with regard to the disclosure of contacts between public officials and lobbyists and other third parties seeking to influence public decision-making.

30. Local and regional authorities must respond by establishing comprehensive systems for conflict of interest management - to identify, prevent, manage, and resolve conflicts of interest. These include mandatory, regular declarations of interests and outside activities; clear and accessible rules identifying conflicts, such as misuse of confidential information, acting for third parties, contact with lobbyists or acceptance of gifts; and comprehensive enforcement and monitoring mechanisms supported by regular staff assessments, ongoing ethics training, and independent review by ethics committees or officers. Secure electronic systems should be implemented to manage declarations efficiently, and whistleblower protection must be ensured through confidential reporting channels.

31. Additional measures include auditing conflict-of-interest practices, regulating employment flows between public and private sectors, fostering an ethical leadership culture, and promoting stakeholder engagement. Training, educational campaigns, and coordination with civil society, NGOs, and international partners should be provided to maintain awareness and strengthen integrity. Public disclosure policies, complemented by effective resolution of identified conflicts, are essential to promote transparency, reduce risks, and build trust within communities.

Key criteria:

- **Definitions and scope:**
 - o Are there publicly accessible definitions of conflict of interest and which categories of officials are covered? (elected representatives, appointed staff, executives, elected representatives who sit on the governing bodies of companies owned or controlled by their local authority, and private persons entrusted with public functions)
 - o Are clear, accessible rules in place for identifying, preventing, and resolving conflicts of interest?
- **Declarations and recusals to prevent conflicts of interest:**
 - o Are all relevant persons required to make early, regular, and ad hoc declarations of interests and outside activities?
 - o Is there a systematic disclosure and publishing of records of contacts with lobbyists and other third parties seeking to influence decision-making?
 - o Are formal recusal procedures enforced in cases of conflicts of interest?
- **Registers, reviews, and oversight:**
 - o Are conflict of interest disclosures and related information stored in electronic registers, regularly reviewed and audited independently, ensuring data protection?
 - o Are independent ethics committees or authorities responsible for monitoring compliance and investigating complaints?
- **Regulation, restrictions, and enforcement:**
 - o Are clear rules in place on secondary employment, significant gifts, and post-employment restrictions?

- o Are there effective, proportionate sanctions for breaches of conflicts of interest rules, and is enforcement transparent?
- **Reporting and training:**
 - o Are anonymised annual summaries of conflicts of interest disclosures and actions published regularly?
 - o Is regular training and stakeholder engagement undertaken, with procedural reviews based on feedback and changing risks?

5. Transparency and public engagement

32. Transparency is a fundamental pillar in the prevention of corruption and the promotion of integrity. For regions and municipalities, enhanced transparency builds trust by ensuring openness, providing accessible information, and fostering accountability in public administration. Open government standards enable authorities to operate more transparently and accountably, facilitating public oversight and participation. Developments in information and communication technologies, combined with improved records management and open government practices, offer new opportunities to achieve greater openness and accountability.

33. Legally guaranteed access to information is vital. Citizens and civil society must be able to request and receive information from public authorities regarding the organisation, functioning, and decision-making processes of local and regional governments. Systematic publication of open data – including budget documents, service levels, and procurement information – in user-friendly, machine-readable formats ensures information is accessible, complete, authentic, and protected, consistent with privacy and data protection legislation. Publishing information in multiple languages further enhances accessibility. Recording and live streaming of major meetings of local and regional authorities promote openness, in accordance with privacy, data protection, or other legal requirements.

34. Active community engagement is essential to reinforce transparency and support effective anti-corruption strategies. Inclusion of citizens, civil society, and other stakeholders throughout the policy cycle – from priority-setting to evaluation – improves policy outcomes. Mechanisms such as public consultations, participatory budgeting, and deliberative forms of engagement empower individuals to influence and, in some cases, determine policy decisions. Safeguarding a vibrant civic space and enabling participation without fear of reprisal are prerequisites for meaningful engagement.³¹

35. Open financial reporting by local governments is critical for accountability regarding the collection, management, and expenditure of public resources. Internal and external audits – aligned with Council of Europe standards – provide assurance of integrity, support adherence to the rule of law, and reinforce oversight of elected officials. Council audit committees should have balanced political representation. Whistle-blower protections, accessible ombudsman offices, and the encouragement of NGO-led social audits further strengthen safeguards against corruption and maladministration.

36. International and Council of Europe standards and best practices, including UNCAC Articles 10 and 13, the International Open Data Charter, and the European Urban Charter III, call for the adoption of open government measures, effective monitoring and enforcement, and robust complaints mechanisms. Authorities are encouraged to implement educational activities, raise awareness about transparency and anti-corruption, and support public information campaigns to foster a culture of zero tolerance for corruption. These actions collectively underpin a framework for openness, integrity, and citizen participation in local and regional governance.

³¹ Civic space is defined as the freedom and means for individuals and organized groups to speak, access information, associate, organise, and participate in public decision-making. Congress report on Transparency and open government, 2018.

Key criteria:

- **Financial and data transparency:**
 - o Are annual budgets, financial statements, and core datasets published in accessible, user-friendly formats?
 - o Are key fiscal data available online and in machine-readable formats?
- **Open data and public consultation:**
 - o Are open data policies adopted, with regular updates and support from elected officials?
 - o Are major decisions subject to structured public consultation and feedback?
- **Access and civic participation:**
 - o Are there robust, timely public access procedures, including open data portals and public meetings?
 - o Are procedures in place for active public comment and involvement in all stages of policy cycles?
- **Reporting and complaints:**
 - o Are anti-corruption bodies, ombudsman offices, and whistleblowing channels accessible to all and well publicised?
- **Budgeting and civic feedback:**
 - o Can citizens participate in budgeting and major contract oversight?
 - o Are there effective feedback mechanisms for public services, and is feedback reported and used for improvement?
- **Awareness and training:**
 - o Are awareness campaigns and educational initiatives conducted regularly to promote transparency?
 - o Is regular training on open government and transparency requirements provided to staff and elected representatives?

6. Public procurement

37. While public procurement is usually considered as particularly prone to corruption, local and regional authorities may also assess corruption risks in other corruption prone areas such as service delivery, building and other permits, territorial / urban planning and development, execution of budgets, management of assets and municipally owned enterprises.

38. Public procurement is particularly vulnerable to corruption risks because it involves significant public spending and the transfer of public resources to the private sector. Challenges such as limited expertise, the “revolving door” phenomenon - where local or regional authority employees move to jobs in private companies competing for public contracts - and a lack of transparency further exacerbate these risks. Detecting corruption in procurement remains a challenge, underscoring the need for comprehensive and clear rules and procedures throughout the process. To address these vulnerabilities and ensure compliance with international and Council of Europe standards and best practices, local and regional authorities must establish robust legal and administrative frameworks. These frameworks

should be grounded in transparency, competition, and objective decision-making, with explicit integration of sustainability and human rights considerations across all procurement activities.

39. Authorities should publish procurement data at every stage in user-friendly, machine-readable formats, enabling public scrutiny and civil society involvement. Legal standards should provide for procedural simplicity and accessibility, extending transparency obligations to private contractors delivering outsourced services. The introduction and use of e-procurement systems is strongly recommended to reduce discretionary intervention and enhance integrity.

40. Further, procurement staff must meet specified professional qualification standards, ensuring the capacity to manage complex contracts, perform audit functions, and uphold ethical conduct. The use of national indicator frameworks to analyse risks such as favouritism and inefficiency should be systematically integrated. Internal controls, evaluation mechanisms, and integrity pacts between contracting authorities and bidders must be in place, monitored by civil society actors, to prevent conflicts of interest and improper lobbying.

41. To reinforce best-practice compliance, authorities must conduct periodic evaluations of disciplinary proceedings and whistle-blower protection mechanisms, with the results made publicly available. Enforcement mechanisms should provide for effective legal recourse, including independent complaints bodies and transparent investigation processes. Regular training programmes should be designed to maintain a culture of anti-fraud, ethical responsibility, and ongoing professional development.

42. A comprehensive corruption prevention strategy must address all aspects of procurement to ensure integrity and accountability.³²

Key criteria:

- **Transparency and access:**
 - o Do clear laws and procedures regulate public procurement, ensuring transparency competition and objective decision-making?
 - o Is all procurement-related data published promptly and is accessible at every stage of the procurement process?
- **Procedural fairness:**
 - o Are procurement documents, criteria, and decisions publicly available and accessible in timely manner?
 - o Are adequate bid preparation periods guaranteed for all bidders?
 - o Is information on the procurement process and requirements communicated to all potential bidders simultaneously and without privileged or early access for any entity?
 - o Are all communications with bidders – including questions and clarifications – fully documented and retained for audit purposes?
 - o Are specifications and contract terms prepared by a team-based, collegial process to prevent undue individual influence or capture by any single official or elected representative?
 - o Are single-source or non-competitive procurements avoided or strictly limited to justifiable cases, with full documentation and transparency for all approvals or consents?
- **Digitalisation and equality:**
 - o Are e-procurement systems and digital tools used to enhance transparency?

³² Congress Report on Making public procurement transparent at local and regional levels, 2017, pp 5-6.

- o Are contractors, including private providers, subject to the same compliance standards?
- **Evaluation and oversight:**
 - o Are evaluation criteria, including thresholds, objective, quantifiable, disclosed in advance in procurement documents, and consistently applied?
 - o Are all procurement actions, including decisions by elected bodies, fully documented for audit?
- **Risk assessment and conflicts of interest management:**
 - o Are regular risk assessments conducted throughout the procurement process, based on specific indicators?
 - o Are all committee members required to declare and manage conflicts of interest, with exclusion of individuals with conflicts of interest from procurement decision-making?
- **Public reporting, audit and civic engagement:**
 - o Are audit results, complaints, and major outcomes published?
 - o Are integrity pacts between contracting authorities and bidders promoted and monitored by independent civil society actors?
- **Remedies and reviews:**
 - o Are clear, accessible complaint and appeal systems in place and independently managed?
 - o Are external, risk-based audits conducted regularly across procurement operations?

7. Use of resources across the election cycle

43. Free and fair elections are fundamental to democracy. They rest on the principles of universality, equality, freedom of choice, secrecy of the ballot and direct suffrage.³³ Misuse of administrative resources during local and regional elections undermines these foundations, giving unfair advantage to incumbents or favoured candidates, compromising the neutrality of public authorities and distorting the level playing field among competitors. At local and regional level, where officials and citizens interact closely, the effects are particularly worrisome: cynicism grows, trust lowers, and participation suffers.³⁴

44. In electoral contexts, administrative resources involve human, financial, material, legal, communication and symbolic assets that are tied to public office or public prestige. Misuse occurs whenever these assets are leveraged for electoral gain rather than for legitimate public purposes. This can be through pressure on staff, selective access to public premises, or publicly funded communications that blur the line between information and campaigning.³⁵

45. Local and regional authorities are especially exposed. They hold discretion over land-use and zoning, public procurement and staffing, often within communities where informal ties are strong and external scrutiny is weaker. Moreover, local actors frequently hold election-related functions (for example, membership of commissions or responsibility for allocating campaign venues). This proximity and role overlap raise the risk that routine public functions are mixed with partisan political aims.³⁶

³³ ICCPR Art 25, ECHR Art 3 of Prot 1.

³⁴ Congress report on Administrative resources and free elections, 2019, pp 5-6, 10-11.

³⁵ VC report on the misuse of administrative resources during elections, 2013, paras 10-13, [default.aspx](#).

³⁶ Congress report on administrative resources and free elections, 2019, p 12.

46. Common patterns of misuse at the grassroots level include redirecting budgets towards high-visibility projects before elections, providing benefits or gifts to voters, using public facilities, such as official cars, IT equipment or municipal premises or staff for campaign purposes. Misuse of communication resources manifests in particular through privileged access to state-owned or public service media in favour of particular candidates. Legal misuse may involve last-minute changes to electoral rules that disadvantage opponents or orchestrated official appearances that signal endorsement of a particular candidate. These actions collectively threaten the integrity and impartiality of local electoral processes³⁷.

47. International and Council of Europe standards and best practices (mostly by the Venice Commission) offer a consistent set of safeguards that are summarised and articulated in the Congress report on administrative resources and fair elections.³⁸ Key principles include neutrality of public authorities, equitable media access, transparent party and campaign financing, effective complaint and appeal procedures, and proportionate, predictable sanctions³⁹. Municipalities and regions are encouraged to codify clear procedures for allocating campaign spaces, publish timely decisions that affect campaigning, protect whistle-blowers, and audit procurement and budgetary changes specifically during election periods. These measures do not constrain legitimate government work; rather, they clarify boundaries and protect the integrity of both administration and competition.⁴⁰

48. Misuse of administrative resources is a stress test for integrity systems at the grassroots level. A blend of clear rules, vigilant implementation and civic oversight (grounded in international and Council of Europe standards) can restore fairness, bolster public trust and align local practice with democratic principles.

Key criteria:

- **Clear rules and procedures:**
 - o Are rules clearly defining the permitted and prohibited use of administrative resources during elections adopted for both staff and elected representatives?
 - o Are codes of conduct specific to elections adopted, addressing campaign gifts, invitations to events and improper official appearances?
- **Transparent and objective staffing:**
 - o Are all recruitments, appointments and other human resources processes merit-based and free from political interference during election periods?
- **Campaign related use of public resources and equal access to candidates:**
 - o Is campaign-related use of public resources, including premises, equipment, funding, and staff time, recorded, disclosed, and subject to transparent equal-access principles?
 - o Are mechanisms in place to guarantee all candidates equal access to public venues, meeting spaces and information needed for campaigning?
- **Enhanced scrutiny for procurement and grants:**
 - o Are all procurement and grant allocations or spending decisions during electoral periods subject to enhanced scrutiny and documentation?
- **Monitored and balanced media coverage:**
 - o Is fair and equal access to public media for all candidates ensured, with independent monitoring?

³⁷ Ibid, pp 13-18.

³⁸ Congress report on Administrative resources and fair elections: a practical guide for local and regional politicians and public officials, 2019.

³⁹ VC report on the misuse of administrative resources during elections, 2013, paras 25-33, [default.aspx](#).

⁴⁰ Congress report on administrative resources and free elections, 2019, pp 28, 39.

- **Complaints and remedies:**
 - o Are impartial complaint and appeal systems available for all stakeholders, with transparent and proportionate sanctions for misuse?
 - o Are corrective measures, including possible annulment of tainted results, in place for serious abuse?
- **Audit, consultation, and whistle-blower protection:**
 - o Are significant budget reallocations and discretionary decisions during election periods subject to public audit and consultation?
 - o Are confidential reporting channels and protections implemented for whistle-blowers reporting misuse?
- **Public registers and oversight:**
 - o Are public registers maintained for interests, ad hoc declarations, and recusals related to election decisions?
 - o Are oversight functions by local audits, ombudsman, and independent observers strengthened and accessible for all stakeholders, with elected representatives subject to monitoring to the same standards as staff?

III. Conclusions

49. Preventing and combating corruption at the local and regional levels requires a robust and integrated integrity system. This system should operationalise clear standards of conduct, build institutional capacity, and foster meaningful civic participation. By translating international and European guidance into practical questions, the checklist enables authorities to systematically identify risks in priority domains – such as procurement, recruitment, conflicts of interest, financial transparency, codes of conduct, and community engagement. Special attention must be given to the misuse of administrative resources during elections, as these periods test the strength of ethical safeguards and neutrality in government processes.

50. For sustainable impact, the checklist should be embedded into recurring cycles of self-assessment and peer review, supported by explicit ownership, time-bound action planning, and transparent reporting of progress indicators. Integrating digital tools – for e-procurement, open data, and financial disclosures – alongside strong internal controls, independent external audits, and comprehensive whistleblower protections will reinforce accountability at all stages. Close cooperation with national oversight bodies and alignment with Council of Europe standards are essential to ensure consistency, resilience, and adaptivity across local and regional settings.

51. In critical domains such as public procurement, authorities must commit to end-to-end transparency, publish detailed tender data, justify exceptional procedures (notably near elections), and facilitate independent scrutiny to deter favouritism. Recruitment processes should be merit-based and transparent, with strict safeguards against nepotism and undue influence, paired with mandatory declarations and effective sanctions for violations. Management of conflicts of interest, rigorous financial oversight, and explicit codes of conduct – all supported by regular training and open public consultation – are fundamental to sustaining trust and integrity.

52. When applied consistently, this approach builds a credible framework for ethical leadership and responsive governance. Regular review, stakeholder engagement, and adaptation to evolving risks will protect fundamental rights, enhance the quality of public service delivery, and strengthen public confidence in democracy at the local and regional levels.

Appendix 1. Overview of relevant international and Council of Europe anti-corruption standards

53. Before presenting the relevant international and European anti-corruption standards and monitoring, it is important to mention the **relevant case law of the European Court of Human Rights**:

54. The [European Court of Human Rights](#) has addressed issues of corruption in several judgments, underscoring the intrinsic link between human rights protection and anti-corruption measures. The Court recognises freedom of expression as fundamental for exposing corruption, holding that suspicions of bribery constitute matters of public interest and that public officials are subject to wider criticism than private individuals. Notable cases, including *Kasabova v. Bulgaria*, *Rywin v. Poland*, and *Gongadze v. Ukraine*, affirm this principle, with the Court reiterating the importance of media and public access to information related to corrupt practices⁴¹.

55. The ECtHR also emphasises the imperative that justice remains free from improper influence, whether political or private, identifying the non-removability of judges as an essential safeguard for judicial independence and integrity. Key decisions such as *Baka v. Hungary* and *Paluda v. Slovakia* highlight the risks posed by executive interference in the judiciary and reinforce structural protections against corruption⁴².

56. Further, while affirming the right of association for political parties, the Court requires transparent and accountable systems for monitoring party finances. In *Cumhuriyet Halk Partisi v. Turkey*, the ECtHR cautioned that oversight mechanisms must be implemented in a manner that is clear, proportionate, and not subject to misuse, balancing the need for financial transparency with rights of association and political participation⁴³.

57. Overall, ECtHR jurisprudence confirms that efforts to counter corruption are integral to the realisation of fundamental rights, and that protective frameworks must be robust, transparent, and proportionate. These judgments guide Member States in aligning anti-corruption measures with European human rights standards and promote the integrity of public institutions.

58. The legal instruments, monitoring and technical cooperation tools presented below set out a comprehensive foundation for a European response to corruption at the local and regional government levels. They inform national and subnational law-making, shape institutional practice and provide the framework for ongoing evaluation and improvement of integrity systems in public administration across the continent and constitute the normative basis for the present checklist.

Council of Europe anti-corruption standards

59. The [Resolution \(97\) 24 on the twenty Guiding Principles for the fight against corruption](#) highlights prevention, transparency, accountability, public awareness, and international cooperation. It recognises the need for independent agencies, effective investigative measures, and whistleblower protections across all tiers of government, including local and regional authorities. By setting out core principles, the Resolution forms the foundational basis for GRECO's monitoring.

60. The Council of Europe [Civil Law Convention on Corruption](#) (ETS No. 174, 1999) establishes the right of any individual harmed by corruption, including those affected by acts involving public officials, elected representatives, and private actors, to seek compensation. The Convention expressly applies at all levels of government, including local and regional authorities, and sets out requirements for transparency and accountability across all public functions. By mandating measures such as clear standards for public administration and the facilitation of civil remedies, the Civil Law Convention contributes to the promotion of integrity and the strengthening of oversight within municipal and regional administrations. Its provisions are intended to ensure that local and regional actors are fully integrated into national anti-corruption frameworks, thereby supporting effective prevention, detection, and redress for corruption-related harm.

61. The Council of Europe [Criminal Law Convention on Corruption](#) (ETS No. 173, 1999) requires States Parties to criminalise a broad spectrum of corrupt practices, encompassing active and passive

⁴¹ GRECO has also highlighted the key role of whistleblowers in exposing high-level corruption involving political figures.

⁴² GRECO, in its fourth evaluation round, also underlined the importance of safeguarding the independence of judges to prevent undue political pressure that could lead to biased or corrupt decisions serving private rather than public interests.

⁴³ GRECO, in its third evaluation round, stressed the importance of creating a coherent framework to ensure transparency in party funding.

bribery, trading in influence, and the laundering of proceeds of corruption. The Convention specifically covers offences committed at local and regional levels and refers to the role of “mayor” and other categories of public officials, including members of local public assemblies and councils, thereby providing comprehensive coverage of office holders and employees at subnational tiers. The Explanatory Report confirms the intent to include all possible categories of public officials. Through its provisions on criminalisation, prevention, and oversight, the Criminal Law Convention supports integrity, transparency, and accountability throughout local and regional public administration, facilitating robust anti-corruption enforcement across all levels of government. The [Additional Protocol to the Criminal Law Convention on Corruption](#) (ETS No. 191) further extends the scope of the Convention by requiring Parties to criminalise active and passive bribery of domestic and foreign arbitrators and jurors, thus strengthening anti-corruption measures and promoting integrity in the administration of justice at all levels.

62. [Recommendation No. R \(2000\) 10 on codes of conduct for public officials \(Explanatory Memorandum\)](#) of the Committee of Ministers, including a Model code of conduct for public officials (in appendix) calls upon public authorities to implement and periodically review codes of conduct for public officials, establishing standards for integrity, transparency, impartiality, and accountability. The Recommendation underscores the importance of enforcement mechanisms and disciplinary measures applicable at all levels of public administration. Such codes educate officials and inform the public about expected standards of behaviour and help to maintain trust in public administration.⁴⁴

63. [Recommendation No. R \(2003\) 4 on common rules against corruption in the funding of political parties and electoral campaigns](#) sets forth principles aimed at promoting transparency, accountability, and integrity in the financing of political parties and election campaigns. The Recommendation calls for robust regulatory frameworks that require disclosure of sources of funding, regular auditing of party finances, and limits on donations and spending to prevent undue influence and corruption. Particular emphasis is placed on the need for transparent reporting, effective monitoring mechanisms, and enforcement measures at national, regional, and local levels.

64. [Recommendation CM/Rec\(2014\)7 on the Protection of whistleblowers, adopted by the Committee of Ministers of the Council of Europe on 30 April 2014 together with its explanatory memorandum](#) set out comprehensive principles for the protection of individuals who disclose information on threats or harm to the public interest, including corruption, maladministration, and other misconduct. The Recommendation encourages Member States to establish clear legal frameworks that protect whistleblowers from retaliation, ensure confidentiality, and facilitate secure reporting channels. It emphasises the importance of raising public awareness, providing access to advice, and guaranteeing effective follow-up on disclosures in both the public and private sectors. Local and regional authorities are urged to implement these standards, thereby supporting a culture of openness and integrity and strengthening mechanisms for accountability and oversight in public administration. The explanatory memorandum further clarifies the scope and practical implementation of the Recommendation, offering guidance on balancing protection with the need for due process and transparency.

65. [Recommendation CM/Rec\(2018\)4 of the Committee of Ministers to member States on the participation of citizens in local public life](#) and its [Explanatory Memorandum](#) as well as the [CM\(2017\)83 Guidelines for civil participation in political decision making](#) promote citizen participation in political decision-making at the local and regional levels, advocating transparent, inclusive processes and access to information. These instruments support civic engagement to improve public trust and mitigate corruption risks.

66. [Recommendation \(2019\)3 of the Committee of Ministers to member States on supervision of local authorities' activities](#) advocates for balanced systems that ensure legality, accountability, and transparency without undermining local autonomy. Effective supervision mechanisms contribute to the prevention of corruption and reinforce public trust in local governance.

67. [Recommendation CM/Rec\(2022\)2 of the Committee of Ministers to member States on democratic accountability of elected representatives and elected bodies at local and regional level](#) focuses on transparency, ethical standards, public oversight, and the prevention of conflicts of interest. These standards are designed to strengthen governance and enhance public trust at the subnational level.

⁴⁴ Relevant Council of Europe instruments also include documents adopted by the Parliamentary Assembly with a view to stepping up the fight against corruption and restoring trust in the efficiency and effectiveness of democratic institutions, such as Resolution 2170 (2017) and Recommendation 2105 (2017) on Promoting integrity in governance to tackle political corruption, as well as Resolution 2192 (2017) on Youth against corruption. The Committee of Ministers has also adopted useful standards for the fight against corruption, namely Recommendation CM/Rec(2014)7 on the Protection of Whistleblowers of 30 April 2014.

68. [Recommendation \(2023\)5 of the Committee of Ministers to member States on the principles of good democratic governance](#) and its [Explanatory Memorandum](#) define core principles of good democratic governance – such as accountability, transparency, legality, participation, and integrity – for all levels of public administration. Adoption of these principles supports corruption prevention and strengthens trust in democratic institutions.

69. Relevant Parliamentary assembly documents include:

- [Recommendation 1908 \(2010\) of the Parliamentary Assembly on Lobbying in a democratic society, including the European code of good conduct on lobbying](#);
- [Resolution 2170 \(2017\)](#) and [Recommendation 2105 \(2017\)](#) “Promoting integrity in governance to tackle political corruption”;
- [Resolution 2192 \(2017\)](#) “Youth against corruption”.

70. The [Venice Commission](#) issues opinions and recommendations on constitutional and legal frameworks for anti-corruption, emphasising the role of independent anti-corruption agencies, the need for precise legal definitions, safeguards against political interference, specialized judicial mechanisms, transparent procedures, whistle-blower protection, effective asset-declaration regimes and stakeholder consultation⁴⁵. Its guidance targets the development of effective anti-corruption systems aligned with democratic principles and international standards.

71. Relevant Venice Commission documents include:

- [Venice Commission Code of good practice in electoral matters: Guidelines and Explanatory Report](#) (2002);
- [Venice Commission and OSCE/ODIHR Joint Guidelines “Preventing and responding to the misuse of administrative resources during electoral processes”](#) (2016).

Relevant Congress standards and resources

72. The [European Charter of Local Self-Government](#) (ETS No. 122) obliges all 46 Council of Europe Member States to ensure local governments act in the interests of their populations (Article 3), thereby reinforcing anti-corruption efforts. The Charter requires merit-based staff recruitment (Article 6), safeguards the independent exercise of elected representatives’ functions (Article 7.1), and mandates appropriate financial compensation (Article 7.2) and requires that activities incompatible with local elective office must be defined by law (Article 7.3). Moreover, it specifies that administrative supervision of local authorities should be defined by law and concern legal and constitutional compliance (Article 8).

73. The [Additional Protocol to the European Charter of Local Self-Government on the right to participate in the affairs of a local authority](#) (CETS No. 207), ratified by 23 member states, guarantees everyone the right to participate in local authority affairs without discrimination (Article 1). To prevent corruption and ensure transparency, the Protocol allows necessary restrictions to safeguard ethical integrity, prohibiting improper conduct such as bribery or coercion in participatory processes (Article 1.5.2). Measures to promote participation include consultative procedures, local referendums, access to official documents, and use of information and communication technologies (Article 2.2).

74. Both of these binding legal instruments [are monitored by the Congress \(Monitoring Committee\)](#). The [Carta Monitor](#) website provides access to analysis by country and by article.

75. In 1999 the Congress adopted the [Resolution 79 \(1999\)](#) and [Recommendation 60 \(1999\) on political integrity of local and regional elected representatives](#) with the appended [European Code of conduct on the political integrity of local and regional representatives](#). For a long period of time the Code served as a reference text for local and regional authorities in Europe.

76. With new developments such as growing public expectations for high ethical standards, digitalisation and outsourcing of public services, it appeared necessary to revise and update the Code of 1999. The new [European Code of Conduct for all Persons Involved in Local and Regional Governance](#) adopted in 2018 extends the scope of application of ethical principles and standards to all persons involved in local and regional governance. It promotes explicit integrity policies, accountability, transparency, impartiality, and merit-based practices. It sets guidelines for managing conflicts of

⁴⁵ Mostly for Montenegro, Moldova, Ukraine, Georgia and North Macedonia.

interest, fraud prevention, procurement, post-employment, reporting wrongdoing, and protecting personal data, while emphasising the need for effective implementation and training. [Resolution 433 \(2018\)](#) urges local and regional authorities to adopt or develop similar codes, encourages educational and advisory initiatives, and supports widespread dissemination and cooperation with GRECO.

77. In 2016 the Congress adopted the [Resolution 401 \(2016\) “Preventing corruption and promoting public ethics at local and regional levels”](#) containing the [Road map of activities for preventing corruption and promoting public ethics at local and regional levels](#). In the framework of the Road map, the Congress adopted [six thematic reports](#).

78. Resolution 402 (2016) “The misuse of administrative resources during election processes: the role of local and regional elected representatives and public officials” addresses the risks posed by the misuse of administrative resources during election processes at local and regional levels. The Resolution calls on elected representatives and public officials to uphold integrity by refraining from using public assets, personnel, or privileges for electoral advantage. It emphasises the importance of clear rules, transparent procedures, robust oversight mechanisms, and training to prevent abuses, ensuring a level playing field for all candidates. The Resolution also encourages local and regional authorities to foster awareness among staff and officials, strengthen reporting and complaint channels, and enforce effective sanctions against violations, thereby safeguarding the fairness and credibility of electoral processes.

79. Resolution 421 (2017) and Recommendation 405 (2017) “Making public procurement transparent at local and regional levels” urge local and regional authorities to strengthen transparency and integrity in public procurement processes. Key measures include establishing clear, accessible procedures for competitive bidding, ensuring the publication of information on procurement contracts, and adopting robust oversight and monitoring mechanisms. The texts advocate for training public officials in ethical procurement practices, supporting stakeholder engagement, and promoting the use of e-procurement systems to enhance openness and efficiency. Authorities are also called to prevent conflicts of interest and corruption by enforcing strict rules and supporting whistleblower protections. These instruments aim to foster trust, accountability, and value for money in local and regional public procurement.

80. Resolution 435 (2018) and Recommendation 424 (2018) “Transparency and open government” urge local, regional, and national authorities to adopt robust open government standards, taking inspiration from the International Open Data Charter, Open Contracting Data Standard, and the Code of Good Practice for Civil Participation in the Decision-Making Process. Key measures include promoting participation, trust, accountability, and independence; introducing comprehensive training to raise awareness of transparency; making open data and key documents accessible and reusable – and available in multiple languages; and ensuring compliance with data protection laws. The texts further encourage internal, external, and social audits, public consultation processes, and involvement of stakeholders including civil society, NGOs, and whistleblowers. Local and regional authorities are called to facilitate citizen engagement in policymaking, budgeting, contract evaluation, and feedback collection, thereby strengthening public trust and tailoring policies to community needs. States are recommended to ensure effective monitoring and enforcement, active contributions from Ombudsman’s Offices, and enhanced budget literacy to support transparency and prevent corruption and waste in public administration.

81. Resolution 434 (2018) and Recommendation 423 (2018) “Conflicts of interest at local and regional level” call on local and regional authorities to adopt comprehensive integrity policies for managing conflicts of interest. Key measures include the creation of independent ethics committees, proactive disclosure of personal interests, clear rules regarding gifts and external influence, and the use of e-systems for processing declarations of interest. Authorities are encouraged to implement regular staff assessments, promote ethical leadership, apply advanced human resource management practices, and establish early and secure reporting channels for potential conflicts. The texts further urge enhanced coordination across all levels of government, stakeholder consultations, and active engagement of civil society, NGOs, and national associations through training and awareness-raising activities. National and regional legislation should precisely define conflicts of interest, guarantee robust procedures for their identification, management, and resolution, and include protections for whistleblowers and clear conditions for political activity. The recommendations also support international and national cooperation to ensure consistency and effectiveness in preventing, detecting, and managing conflicts of interest, as well as safeguarding the independence and impartiality of judicial authorities, fostering administrative cultures intolerant of favouritism, and monitoring the effectiveness of relevant strategies through dedicated agencies.

82. Resolution 444 (2019) and Recommendation 435 (2019) “The protection of whistleblowers-Challenges and opportunities for local and regional government” call on local and regional authorities to establish comprehensive frameworks for the protection of whistleblowers. Key actions include implementing clear procedures and secure channels for reporting misconduct, safeguarding whistleblowers against retaliation, and ensuring confidentiality throughout the reporting and follow-up process. The texts emphasise the importance of raising awareness and providing training for public officials about whistleblower rights and protections. They encourage authorities to promote a culture of integrity and openness, facilitate cooperation with civil society and relevant oversight bodies, and align local policies with national and international standards. By strengthening whistleblower protections and fostering an environment where concerns can be safely raised, local and regional governments can enhance integrity, transparency, and public trust.

83. Resolution 441 (2019) and Recommendation 428 (2019) “Fighting nepotism within local and regional authorities” call on local and regional bodies – and, where applicable, national legislatures – to ensure transparent, merit-based recruitment and promotion through clear, accessible procedures and equal treatment of candidates. They urge regular ethics and anti-corruption audits, particularly in human resource management, as well as the establishment of independent reporting channels and robust integrity bodies, such as Integrity Bureaus, to detect and investigate favouritism and conflicts of interest. The Recommendations emphasise deterrent disciplinary sanctions for breaches of integrity and undisclosed conflicts of interest, strict prohibitions on public officials participating in recruitment processes where their impartiality could be compromised, and the alignment of national legislation to effectively address nepotism. Professional training for public officials and audit staff, mandatory disclosure of relationships, prohibitions on familial recommendations, cooperation with civil society, and adequate staff remuneration are also recommended to reinforce compliance and uphold integrity.

84. Other relevant Congress reports include the following:

- [Resolution 79 \(1999\)](#) and [Recommendation 60 \(1999\)](#) on political integrity of local and regional elected representatives;
- [Resolution 105 \(2000\)](#) on the financial transparency of political parties and their democratic functioning at regional level;
- [Recommendation 86 \(2000\)](#) on the financial transparency of political parties and their democratic functioning at regional level;
- [Resolution 316 \(2010\)](#) on [Rights and duties of local and regional elected representatives: the risks of corruption](#);
- [Resolution 393 \(2015\)](#) and [Recommendation 383 \(2015\)](#) on [Conditions of office of elected representatives](#);
- [Recommendation 434 \(2019\)](#) and [Resolution 443 \(2019\)](#) on [Financial compensation of local and regional elected representatives in the exercise of their office](#);
- [Resolution 452\(2019\)](#) on the Revised Code of Good Practice for civil participation in the decision-making process.

85. In 2023, the landmark European Urban Charter III: Urban living in the era of transformations established detailed guiding principles regarding integrity and prevention of corruption, with a dedicated section addressing these matters.

86. In sum, these documents promote a value-based approach to integrity, emphasising transparency, training, and education rather than excessive regulation from central governments. Best practices include independent ethics committees, proactive disclosure of interests, clear rules on gifts and outside activities, regular staff assessments, ethics training and ethical leadership. Local and regional authorities are encouraged to establish clear procedures to identify, prevent, and resolve conflicts of interest, and to involve stakeholders in developing local frameworks. Ultimately, prevention, transparency, and a strong ethical culture are critical to reducing corruption risks and enhancing public confidence.

87. In February 2021, the Congress adopted a new Code of Conduct for Congress Members and revised its Rules and Procedures to strengthen its ethics regime. These changes include an obligation to declare conflicts of interest. All members are required to sign the Code of Conduct and Declaration of Interests as a prerequisite for exercising full membership rights, such as participating, speaking, voting and receiving expense reimbursement.

88. The Congress has also developed practical tools on open local government, transparency, public ethics and citizen participation. The online *bE-Open* platform presents the international standards and

national frameworks addressing local corruption risks in an interactive way for all the countries where the Congress provided co-operation support (Albania, Armenia, Bosnia and Herzegovina, Georgia, the Republic of Moldova, Ukraine, and Kosovo*).

89. All six thematic reports of the Road map of activities for preventing corruption and promoting public ethics at local and regional levels were translated into Albanian, Armenian, Romanian, Serbian and Ukrainian languages for the use of local public authorities.

Monitoring by the Group of States against Corruption (GRECO) of the Council of Europe

90. GRECO monitors the compliance of member states with Council of Europe anti-corruption standards through a dynamic process of mutual evaluation. This mechanism helps to identify deficiencies in anti-corruption policies at national, regional and local levels, prompting the necessary legislative, institutional and practical reforms. The Sixth evaluation round launched in March 2025 focuses specifically on preventing corruption and promoting integrity at the sub-national level. This theme reflects GRECO's consistent approach to address all levels of government and builds on previous rounds, which examined prevention of corruption and promotion of integrity in central governments, parliaments, among judges and prosecutors, central public administration and law enforcement agencies (notably regarding asset declarations, conflict of interest rules, transparency, counselling etc). GRECO also provides a platform for the sharing of best practice in the prevention and detection of corruption.⁴⁶

Other international anti-corruption standards

91. United Nations Convention against corruption (UNCAC, 2003) (Chapter I, General provisions; Chapter II, Preventive measures; Chapter VI, Technical assistance and information exchange) ratified by all Council of Europe and nearly all UN Member States,⁴⁷ provides for a comprehensive anti-corruption framework covering prevention, criminalisation, international cooperation, asset recovery, and technical assistance. UNCAC requires effective anti-corruption policies and institutions at all levels of government, including local and regional authorities. This encompasses promoting integrity and applying codes of conduct / standards of conduct, preventing conflicts of interest, ensuring transparency in public administration and procurement, ensuring efficient, transparent and merit-based recruitment, promotion and retirement, facilitating reporting of corruption as well as fostering civic engagement. UNCAC provisions should be tailored to local and regional contexts to ensure that subnational authorities promote integrity, transparency, and strong oversight in the exercise of their functions.

92. United Nations International Code of Conduct for Public Officials, which is to be read in conjunction with Art. 8 para 1-3 and Art. 2 UNCAC (1996) establishes principles of integrity, impartiality, transparency, and accountability for public officials. The Code provides a global ethical framework to guide behaviour, prevent conflicts of interest, and foster public trust in government, applicable at all levels of the public administration.

93. The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the Organisation for Economic Co-operation and Development (OECD) requires States Parties to criminalise bribery of foreign public officials at all levels of government, including regional and local authorities. The Convention mandates the extension of anti-corruption policies, codes of conduct, and transparency measures to subnational governments, promoting integrity through clear standards of conduct, merit-based public administration, and enhanced reporting and oversight mechanisms. To ensure effective prevention and detection of bribery, Parties are encouraged to tailor implementation strategies, provide capacity-building for local officials, and foster civic engagement and accountability within regional and local contexts. In this way, the Convention strengthens integrity and transparency across all tiers of public administration, supporting robust governance and public trust.

94. Other relevant OECD documents include:

- OECD Recommendation on Guidelines on Corporate Governance of State-Owned Enterprises (2015), as amended in 2024;
- OECD Recommendation on Transparency and Integrity in Lobbying and Influence (2010), as amended in 2024;

⁴⁶ Council of Europe, GRECO, What is GRECO, <https://www.coe.int/en/web/greco/about-greco/what-is-greco>; Ibid., Evaluations, <https://www.coe.int/en/web/greco/evaluations>.

⁴⁷ With the exception of Syria, North Korea and Eritrea. UN Treaty Collection, UNCAC.

- OECD Recommendation on Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises (2019);
- OECD Recommendation on Public Integrity (2017);
- OECD Recommendation on Public Procurement (2015);
- OECD Recommendation on Guidelines for Managing Conflict of Interest in the Public Service (2005).

95. Other relevant EU documents include:

- EU Directive 2019/1937 on the protection of persons who report breach of Union Law;
- EU directives on public procurement.

Appendix 2. Reference documents *

1. Anti-corruption strategies and risk assessment

Committee of Ministers Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption, principles 1 and 3;
Committee of Ministers Recommendation No. R (2000) 10 on codes of conduct for public officials (Explanatory Memorandum) of the Committee of Ministers;
Resolution 316 (2010) on Rights and duties of local and regional elected representatives: the risks of corruption;
Resolution 401 (2016) "Preventing corruption and promoting public ethics at local and regional levels";
European Code of Conduct for all Persons Involved in Local and Regional Governance (2018), Article 13;
Resolution 434 (2018) and Recommendation 423 (2018) "Conflicts of interest at local and regional level"
Resolution 435 (2018) and Recommendation 424 (2018) "Transparency and open government"
Resolution 495 (2023). "European Urban Charter III: Urban living in the era of transformations", section 4, principle 1;
United Nations Convention against corruption (UNCAC, 2003) , Chapter II "Preventive measures";
OECD Recommendation on Public Integrity (2017);
GRECO Sixth Evaluation Round Reports.

2. Standards of conduct

Committee of Ministers Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption, principle 15;
Committee of Ministers Recommendation No. R (2000) 10 on codes of conduct for public officials (Explanatory Memorandum);
European Code of Conduct for all Persons Involved in Local and Regional Governance (2018);
Resolution 401 (2016) "Preventing corruption and promoting public ethics at local and regional levels";
Resolution 495 (2023). "European Urban Charter III: Urban living in the era of transformations", section 4, principle 1;
United Nations Convention against corruption (UNCAC, 2003) , Article 8;
OECD Recommendation on Public Integrity (2017);
GRECO Sixth Evaluation Round Reports.

3. Recruitment and remuneration

Committee of Ministers Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption, principle 15;
Committee of Ministers Recommendation No. R (2000) 10 on codes of conduct for public officials (Explanatory Memorandum);
European Code of Conduct for all Persons Involved in Local and Regional Governance (2018);
Resolution 393 (2015) and Recommendation 383 (2015) "Conditions of office of elected representatives";
Resolution 401 (2016) "Preventing corruption and promoting public ethics at local and regional levels";
Resolution 434 (2018) and Recommendation 423 (2018) "Conflicts of interest at local and regional level"
Resolution 441 (2019) and Recommendation 428 (2019) "Fighting nepotism within local and regional authorities"
Resolution 444 (2019) and Recommendation 435 (2019) "The protection of whistleblowers-Challenges and opportunities for local and regional government"
Resolution 495 (2023) "European Urban Charter III: Urban living in the era of transformations", section 4, principle 1;
European Charter of Local Self-Government (ETS No. 122), Articles 6 and 7.
United Nations Convention against corruption (UNCAC, 2003) , Article 7;
OECD Recommendation on Public Integrity (2017);
GRECO Sixth Evaluation Round Reports.

* Except where otherwise indicated, reference documents included in this list are Congress adopted texts.

4. Managing conflicts of interest

Committee of Ministers Recommendation No. R (2000) 10 on codes of conduct for public officials (Explanatory Memorandum); Articles 13-23
 European Code of Conduct for all Persons Involved in Local and Regional Governance (2018), Article 9;
 Resolution 393 (2015) and Recommendation 383 (2015) "Conditions of office of elected representatives";
 Resolution 401 (2016) "Preventing corruption and promoting public ethics at local and regional levels";
 Resolution 434 (2018) and Recommendation 423 (2018) "Conflicts of interest at local and regional level"
 Resolution 435 (2018) and Recommendation 424 (2018) "Transparency and open government"
 Resolution 441 (2019) and Recommendation 428 (2019) "Fighting nepotism within local and regional authorities"
 Resolution 444 (2019) and Recommendation 435 (2019) "The protection of whistleblowers-Challenges and opportunities for local and regional government"
 Resolution 495 (2023) "European Urban Charter III: Urban living in the era of transformations", section 4, principle 2;
 European Charter of Local Self-Government (ETS No. 122), Articles 6 and 7.
 United Nations Convention against corruption (UNCAC, 2003) , Articles 7.4 and 8.5.
 OECD Recommendation on Public Integrity (2017);
 GRECO Sixth Evaluation Round Reports.

5. Public procurement

Committee of Ministers Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption, principle 14;
 Council of Europe Civil Law Convention on Corruption (ETS No. 174, 1999)
 Council of Europe Criminal Law Convention on Corruption (ETS No. 173, 1999)
 Recommendation No. R (2000) 10 on codes of conduct for public officials (Explanatory Memorandum) of the Committee of Ministers (standards for integrity, impartiality, and transparency in procurement behaviour);
 Resolution 421 (2017) and Recommendation 405 (2017) "Making public procurement transparent at local and regional levels"
 Resolution 435 (2018) and Recommendation 424 (2018) "Transparency and open government"
 United Nations Convention against corruption (UNCAC, 2003) , Article 9;
 OECD Recommendation on Public Integrity (2017);
 OECD Recommendation on Public Procurement (2015);
 EU directives on public procurement.

6. Transparency and public engagement

Committee of Ministers Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption, principles 11-13;
 Committee of Ministers Recommendation No. R (2000) 10 on codes of conduct for public officials (Explanatory Memorandum);
 European Code of Conduct for all Persons Involved in Local and Regional Governance (2018);
 Resolution 393 (2015) and Recommendation 383 (2015) on Conditions of office of elected representatives;
 Resolution 401 (2016) "Preventing corruption and promoting public ethics at local and regional levels";
 Resolution 435 (2018) and Recommendation 424 (2018) "Transparency and open government"
 Resolution 434 (2018) and Recommendation 423 (2018) "Conflicts of interest at local and regional level";
 Resolution 444 (2019) and Recommendation 435 (2019) "The protection of whistleblowers-Challenges and opportunities for local and regional government"
 Resolution 495 (2023) "European Urban Charter III: Urban living in the era of transformations", section 4, principle 4;
 European Charter of Local Self-Government (ETS No. 122), Articles 6 and 7.
 United Nations Convention against corruption (UNCAC, 2003) , Article 10 and 13;
 OECD Recommendation on Public Integrity (2017);
 GRECO Sixth Evaluation Round Reports.

7. Use of resources across the election cycle

Committee of Ministers Resolution (97) 24 on the twenty Guiding Principles for the fight against corruption, principle 15;
Committee of Ministers Recommendation No. R (2000) 10 on codes of conduct for public officials (Explanatory Memorandum);
Venice Commission Code of good practice in electoral matters: Guidelines and Explanatory Report (2002);
Resolution 402 (2016) "The misuse of administrative resources during election processes: the role of local and regional elected representatives and public officials"
Venice Commission and OSCE/ODIHR Joint Guidelines "Preventing and responding to the misuse of administrative resources during electoral processes" (2016);
European Code of Conduct for all Persons Involved in Local and Regional Governance (2018);
Resolution 435 (2018) and Recommendation 424 (2018) "Transparency and open government"
Resolution 434 (2018) and Recommendation 423 (2018) "Conflicts of interest at local and regional level";
Resolution 444 (2019) and Recommendation 435 (2019) "The protection of whistleblowers- Challenges and opportunities for local and regional government"
Resolution 495 (2023) "European Urban Charter III: Urban living in the era of transformations", section 1, principle 4;
European Charter of Local Self-Government (ETS No. 122)
United Nations Convention against corruption (UNCAC, 2003) , Article 7,8 and 13;
OECD Recommendation on Public Integrity (2017);
GRECO Sixth Evaluation Round Reports.