

# GROUP OF STATES AGAINST CORRUPTION (GRECO)

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



Feature article:  
**The opportunities and challenges of blockchain  
in the fight against government corruption**  
*Digital Ethics Lab, Oxford Internet Institute*

**Anti-corruption body  
of the Council of Europe**  
19th General Activity Report (2018)



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of the Group of States against  
Corruption (GRECO)

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Adopted by GRECO 82  
(18-22 March 2019)

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French edition:  
*19<sup>e</sup> Rapport général d'activités (2018)*  
*du Groupe d'États contre la corruption*  
[www.coe.int/greco](http://www.coe.int/greco)

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

This publication has not been copy-edited  
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Cover photo: Shutterstock  
Photos: GRECO

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Printed at the Council of Europe

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## FOREWORD

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***Marin MRČELA, Vice-President of the Supreme Court of Croatia, President of GRECO***

**T**his year's Activity Report continues the path initiated in 2016. It provides an account of the "state of corruption" in Europe and the United States in 2018, highlighting the main trends drawn from GRECO's evaluations and recommendations, presenting examples of good practices, and showing the situation as regards the level of implementation by our member States of GRECO's recommendations.

As I mentioned in my 7 December statement, "we must never lower our guard in fighting corruption". Perception of low levels of corruption must not lead to complacency. No country is immune to corruption. All countries, irrespective of their position in perception indexes, are required to take concrete measures to prevent and counter corruption. Indeed, perception of low levels of corruption and the reality of the measures countries take (or don't take) to prevent and counter it (which is GRECO's focus) may not necessarily coincide.

Relying on perceptions, and underestimating the strength of preventive measures, leaves the door wide open to behaviours which may very quickly turn into corruption. When conflicts of interest are not properly managed, ethical norms are ignored, political party funding is opaque, the justice system is not or is not perceived as being independent – just to mention a few examples – corruption can very quickly find a way in. And when it does, it is disruptive for any country (or institution), including from a political, social, economic and reputational point of view. This is why it is in every country's interest to fully implement GRECO's recommendations.

In 2018, in spite of significant budgetary constraints and uncertainty, GRECO adopted 39 evaluation, ad hoc or compliance reports. We have strengthened our ability to react in exceptional circumstances on an ad hoc basis, as and when situations arise, and have done so in respect of two countries. We have not hesitated to move to the next level of the non-compliance procedure (high level visit and a public declaration of non-compliance) in cases of persistent lack of implementation of GRECO's recommendations. We have also continued our pioneering work to provide advice on the integrity framework of various institutions, whenever requested, and to mainstream anti-corruption across the activities of the Council of Europe.

As GRECO's compliance procedures in the 4th Evaluation Round are still in full swing and a first set of evaluation findings from the 5th round is now available, I wish to highlight three key trends I observed in 2018.

First, as we approach the 70th anniversary of the Council of Europe and GRECO's 20th year, it is fitting to look back at what has been achieved. And when I do so, I think that 20 years on – while more remains to be done – we can all be proud of our achievements in the area of anti-corruption. It is largely thanks to GRECO and the efforts of member States that today bribes are no longer tax-deductible, legal persons can be held accountable, criminal law provisions are largely aligned on the Council of Europe's anti-corruption standards, public sector integrity is high on political agendas, and rules are in place in the vast majority of our member states for the transparency of political party funding. There is no reason for complacency, as we will see in a moment, but I think it is proper to highlight progress where it exists.

Second, I must confirm a finding I shared with you last year. We have too many countries in a non-compliance procedure meaning that not enough is being done nationally to implement GRECO's recommendations. By the end of 2018, 16 countries remained in a non-compliance procedure. Even worse, in some cases GRECO is seeing regression. Let me be very clear: GRECO's recommendations are not optional. It is part of our collective commitment to this Organisation to take these recommendations seriously and do our utmost to implement them. This may sometimes be challenging, but it is necessary in order to have a system in place that prevents corruption from arising in the first place. After, it is too late...

Third, corruption erodes human rights protection. The potential damage caused by corruption to Human Rights has been laid bare in a number of areas such as the independence of the judiciary, freedom of expression of journalists and whistleblowers, freedom of assembly, detention facilities, social rights, discrimination, and the trafficking of human beings. These links have been brought to light in the work of Council of Europe monitoring or advisory bodies, including GRECO, and also of the European Court of Human Rights.

Independent media and whistleblowers play an essential role in preventing corruption by shedding light on dirty deals and exposing conflicts of interest and corruption. In 2018, we again saw too many journalists harassed, beaten or killed for doing their job, and whistleblowers suffer from retaliatory action after exposing serious malpractice including corruption. I want to pay tribute to the commitment, life and work of these journalists and employees who risk their career, their reputation and sometimes their lives every day to bring about honest reporting and uncover corruption. As one can see from the figures in this report, 14 GRECO member States have not yet ratified the Civil Law Convention of Corruption. Forty-four of GRECO's 49 members received at least one recommendation on whistleblower protection. This is an area where we can and must do better.

In 2018, financial institutions across GRECO's geographical zone have been heavily and collectively exposed to risks of money laundering in relation to corruption. Some of those institutions have had their licence withdrawn, while others have gone through heavy scrutiny. The large scale of certain corruption cases in some European countries has progressively been revealed, whilst in others concerns have been expressed in relation to the state of democracy and the rule of law.

In this context, let me compliment the Secretary General for including GRECO's findings across his 2018 Report on the State of Democracy, Human Rights and the Rule of Law in Europe. I also wish to congratulate the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) for having identified a number of instances in which corruption issues are relevant in its work, the Venice Commission for its work on anti-corruption related issues and the Consultative Council of Europe Judges (CCJE) for its work on judicial integrity. That work has been complementary to, and supportive of, GRECO's own monitoring efforts. We will seek to pursue and deepen GRECO's internal engagements within the Council of Europe in 2019.

Externally, GRECO has continued to attach great importance to ensuring cooperation and synergies with the other international anti-corruption monitoring bodies in the United Nations (UN), Organisation for Economic Co-operation and Development (OECD) and Organization of America States (OAS), within the boundaries of our respective statutory requirements. We have continued to coordinate meetings and evaluation dates, exchanged information, and organised joint events where possible. GRECO's Secretariat hosted an inter-secretariat meeting with the UNODC, OECD and OAS in early January 2018. I wish to thank the successive G20 Presidencies of Germany, Argentina and Japan for making use, where relevant, of GRECO's findings in areas of common interest, such as the judiciary, conflicts of interest and whistleblower protection. I hope this trend will continue. Participation of the EU in GRECO remains pending. A promising discussion on a possible EU observer status in GRECO has taken place in Brussels, but no decision has been taken yet. In 2018, Kazakhstan was a step closer to completing the process for its accession to GRECO. An Agreement on privileges and immunities of GRECO members and members of evaluation teams was adopted by the Committee of Ministers in December 2018.

Mainstreaming gender in all policies and measures is one of the objectives of the Council of Europe Gender Equality Strategy. GRECO has integrated that goal into its monitoring tasks and its working methods. Gender diversity is a key mechanism in the prevention of group-think and, in turn, of corruption. Twenty-two questions

(about a third), in our evaluation questionnaire for the 5th round are gender-related, and have generated some country-specific, gender-related recommendations to several countries in the 5th round evaluation reports adopted thus far. GRECO also decided to participate in a Study – jointly with the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) – on the extent to which gender matters to economic crimes. The results will be available in 2019.

Anniversaries are also an occasion to look forward. We have certainly not – and probably never will – attain the goal of zero corruption. But reducing risks and opportunities for corruption to flourish, and continuing to increase the capacity of our members to prevent, detect and sanction corruption, must remain our permanent goal. We should also be ahead of the curve and not shy away from new challenges such as artificial intelligence (which is the focus of our featured article this year), crowd-funding to by-pass political financing regulations, or corruption in certain specific areas such as sport, local and regional authorities, education, the health sector, business, the exploitation of natural resources, etc.

Many of the problems Europe and the United States face today are the result of real or perceived corruption in the management of public affairs: we have a collective responsibility to act to prevent and stop it.

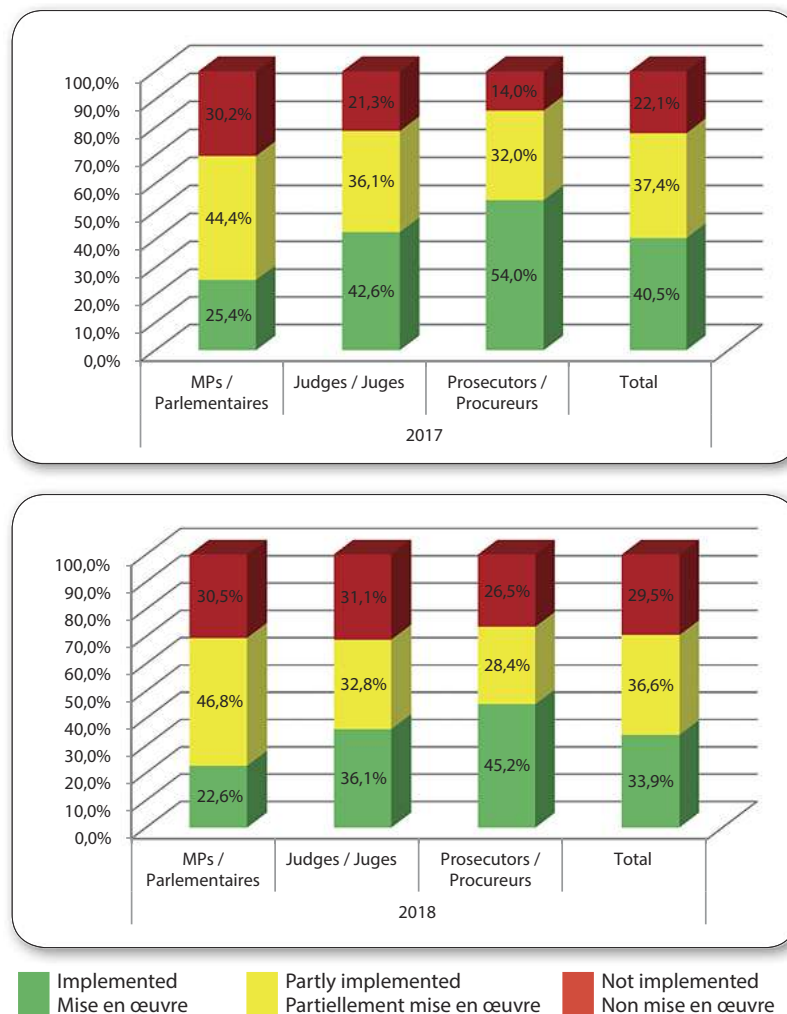


# KEY FINDINGS

**T**he pace of GRECO's evaluation work remained sustained in 2018, in spite of budgetary constraints and uncertainties. Seven evaluation reports, 29 compliance reports and 3 ad hoc (Rule 34) assessments were adopted in 2018. Budgetary constraints directly impacted GRECO. Prudent budget management and voluntary additional contributions by member States (Armenia, Austria, Bulgaria, Czech Republic, Estonia, Finland, Georgia, Ireland, Italy, Latvia, Liechtenstein, Luxembourg, Monaco, Montenegro, Netherlands, Norway, Poland, Romania, Russian Federation, Serbia, Slovak Republic, Switzerland, Ukraine, United States of America) filled part of the gap and enabled GRECO to carry out a significant proportion of its ambitious work programme.

Nearly all GRECO members have been evaluated under the 4th Evaluation Round<sup>1</sup> and the related compliance process was in full swing in 2018. Through the adoption of its 4th Round compliance reports, GRECO continued to push for the implementation of a solid body of recommendations to strengthen the prevention of corruption in respect of members of parliament, judges and prosecutors. The key findings and conclusions of the 4th Evaluation Round were summarised in a Study on "Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors" (2017).<sup>2</sup>

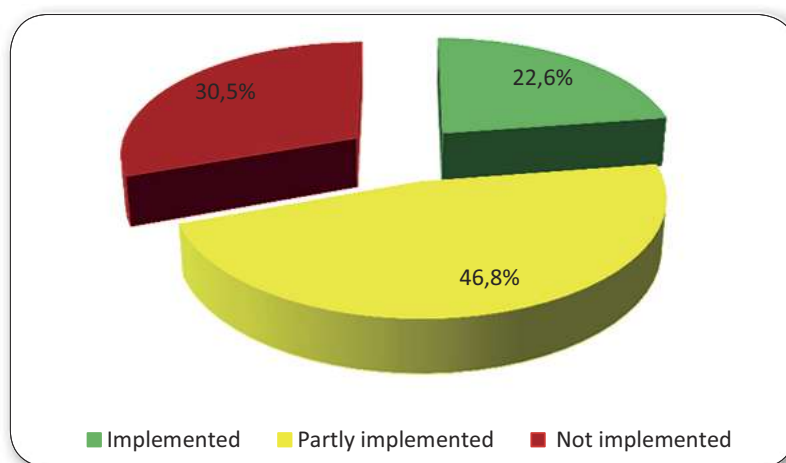
**Implementation of 4th Round recommendations by GRECO member States 2017-2018**  
 Statistics covering all assessments made public by end 2017 – 26 member States, and by end 2018 – 35 member States



1. Only Belarus, Liechtenstein, and San Marino remain to be evaluated under this round.  
 2. See Study "Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors" (2017): <https://rm.coe.int/corruption-prevention-members-of-parliament-judges-and-prosecutors-con/16807638e7m>

**Overall, implementation of the 4th round recommendations slowed down in 2018 compared to 2017** with only 33.9% of recommendations fully implemented (40.5% in 2017), i.e., a reduction of 6.6 percentage points. Only 22.6% of recommendations relating to members of parliament (MPs) were fully implemented in 2018 (25.4% in 2017). The implementation of 4th round recommendations concerning judges decreased to 36.1% in 2018 compared with 42.6% in 2017. As regards prosecutors, while they remained the best performing category under review, 45.2% of the recommendations concerning them were fully implemented (54% in 2017). The slow implementation of 4th round recommendations is reflected in the increasing number of countries in a non-compliance procedure (14 of those 16 non-compliance procedures relate to the 4th Evaluation Round<sup>3</sup>). GRECO's compliance procedures acknowledge the time needed by member States to implement sound reforms by providing for several implementation stages. In many cases under review there is still ample opportunity for these statistics to evolve positively over time.

**Implementation of recommendations – corruption prevention for members of parliament**  
 Statistics covering all assessments made public by end 2018 – 35 member States



**As representatives of the people, MPs are uniquely placed to lead by example and demonstrate the standards expected of those in public service.** GRECO's country-specific analyses and recommendations emphasise how important rules that support high standards of conduct are – when actively developed, reviewed and maintained – as tools and resources for MPs, as is the requirement of transparency in public life. These standards of ethical conduct are not only relevant to national MPs, but also those MPs participating in supranational parliamentary assemblies (such as the Parliamentary Assembly of the Council of Europe (PACE)<sup>4</sup>) and Members of the European Parliament.

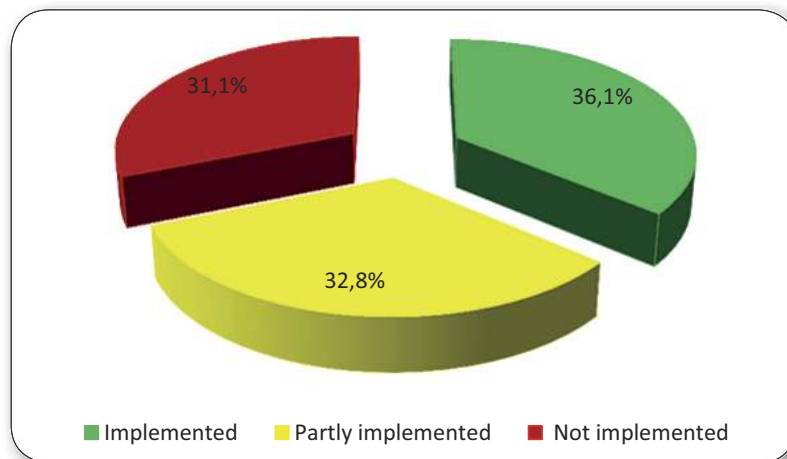
**In the course of its evaluation and compliance process, GRECO has continued to issue or review the implementation of recommendations relating to MPs,** including with respect to:

- ▶ ensuring that all legislative proposals are processed with an adequate level of transparency and consultation, and that urgent procedures are resorted to as an exception, in a limited number of circumstances;
- ▶ adopting codes of ethics/conduct for MPs – covering situations where conflicts of interest might arise (gifts and other advantages, third party contacts, accessory activities, post-employment situations, etc.), making the codes accessible to the public, and ensuring that they are effectively implemented and enforceable;
- ▶ managing conflicts of interest, including through introducing a requirement of ad hoc disclosure when a conflict between specific private interests of individual MPs might emerge in relation to a matter under consideration in parliamentary proceedings;
- ▶ requiring MPs to submit declarations of assets, income, interests and liabilities, and make them public;
- ▶ providing for rules and guidance on the acceptance, valuation and disclosure of gifts, hospitality and other advantages, including external sources of support provided to MPs;

3. Austria, Belgium, Czech Republic, Denmark, France, Hungary, Ireland, Luxembourg, North Macedonia, Portugal, Romania, Serbia, Spain, Turkey.  
 4. See GRECO Assessment of PACE integrity framework <https://rm.coe.int/assessment-of-the-code-of-conduct-for-members-of-the-parliamentary-ass/1680728008>

- ▶ introducing rules on how MPs engage with lobbyists and other third parties who seek to influence the legislative process;
- ▶ developing internal control mechanisms for integrity in Parliament so as to ensure independent, continuous and proactive monitoring and enforcement of the relevant rules, including effective, proportionate and dissuasive sanctions;
- ▶ ensuring that the procedures to lift the immunity of MPs do not hamper or prevent criminal proceedings if they are suspected of having committed corruption-related offences;
- ▶ providing specific and periodic training for all MPs, with a particular focus on new parliamentarians, on ethical questions and conflict of interests.

**Implementation of recommendations – corruption prevention for judges**  
 Statistics covering all assessments made public by end 2018 – 35 member States

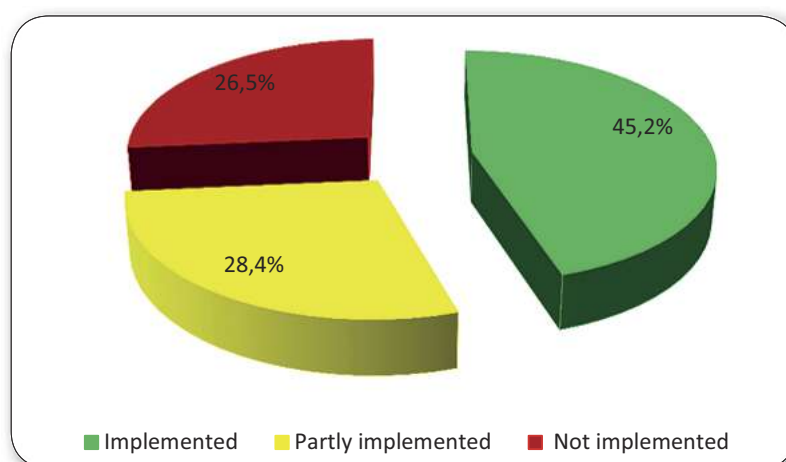


**Judges are the guardian of Human Rights and the Rule of Law.** However, when judges do not live up to the high standards of integrity, independence and impartiality expected of them, trust in judicial institutions is shaken, the independence of the judiciary is weakened, and the battle against corruption is lost. There cannot be an effective fight against corruption without an independent judiciary.

**GRECO has thus continued to issue or review the implementation of recommendations relating to preventing corruption in the judiciary in 2018,** including with respect to:

- ▶ all branches of government recognising and guaranteeing judicial independence. Pressure on judges to refrain from fully exercising their judicial functions or to do so in a biased way not only taints individual judges but also undermines the authority of the judiciary as a fair and impartial arbiter for all citizens;
- ▶ adopting or reviewing codes of conduct. GRECO stresses the importance of active involvement of all members of the profession, i.e. judges from all levels, in the development of a set of standards ideally agreed on following an open debate and discussion on their particular content. These codes also need to be enforceable;
- ▶ managing conflicts of interest. This requires training and on-going professional development to ensure judges can identify the range of potential conflicts of interests that may arise, and know how best to address them. Confidential counselling is very important in this context;
- ▶ introducing a restriction on the simultaneous holding of office as a judge and as an MP or member of local government;
- ▶ ensuring that judges avoid anything that could be construed as an attempt to attract judicial goodwill or favour, such as gifts or other benefits. In case of doubt judges are expected to err on the side of caution or to seek an opinion or permission from a higher judicial authority such as a judicial council, or from dedicated confidential services;
- ▶ supervising judges' activities, while ensuring that such supervision does not interfere with judges' independence in decision-making. This requires precision when defining misconduct in a disciplinary sense, and gross misconduct that could lead to dismissal.

**Implementation of recommendations – corruption prevention for prosecutors**  
Statistics covering all assessments made public by end 2018 – 35 member States



As regards prosecutors, appointment procedures – both at the highest managerial levels and throughout the prosecution service – as well as revocation processes were amongst the key issues assessed to ensure that they provide enough guarantees against undue political interference. Where this was not the case, specific recommendations were issued. Fair, transparent and merit-based appointments and revocations are core to building trust in the prosecution system and are a pre-requisite for independent investigations into high-level corruption cases. Case management systems, in particular rules about the assignment of cases and the possibility to remove a case from a prosecutor, were also examined as ensuring the independence of individual prosecutors in conducting their investigations is an important safeguard against pressures within the system itself, but also from other branches of power.

GRECO has now also carried out a number of evaluations in its 5th Evaluation Round and a first set of findings are now available on preventing corruption and promoting integrity in central governments (top executive functions and law enforcement agencies). While it is too early to detect clear trends, a number of important gaps have already been highlighted and need to be addressed. As regards central governments, these include, but are not limited to, strengthening ethics and integrity standards (e.g., by adopting and publishing a code of conduct for ministers and other persons entrusted with top executive functions), lobbying, management of conflicts of interest and the phenomenon of so-called “revolving doors”, asset declarations, and immunities. As regards law enforcement, GRECO recommendations have so far focused on such issues as enforceable codes of conduct, regular integrity checks for promotion decisions, fair, merit-based and transparent mechanisms for promotion and dismissal, managing conflicts of interest, post-employment restrictions, mechanisms for oversight of police misconduct with sufficiently independent investigations into police complaints and a sufficient level of transparency for the public, and protection of whistleblowers.

## Selected good practice

### Corruption prevention in central government (including top executive functions)

#### **Declaration/disclosure requirements – Finland**

In Finland, a senior government official is required, prior to appointment, to give an account of his/her business activities, of holdings in companies and other property, of duties not related to the office concerned, of part time jobs and of other relations and commitments that may be relevant for the assessment of whether s/he is qualified for performing the tasks required in the relevant office. These individuals are advised to file the disclosure directly with the official preparing the appointment.

Once the person takes up his/her duties, the hiring ministry sends only the part of the disclosure which is public to the Ministry of Finance. The information is posted on the Ministry of Finance's website. When a government official resigns, the relevant ministry asks the Ministry of Finance to delete the aforementioned data from the public information network. Each ministry is responsible for ensuring that the information related to its administrative sector and posted in a public information network is up to date.

The system of disclosure of financial and other outside interests for other **persons entrusted with top executive functions** has a very positive potential for helping prevent conflicts of interest and other violations of law; candidates for these positions are required to file this disclosure

prior to appointment, and therefore, someone in the ministry to which this person is being considered for a position does have the opportunity at least to review the information and advise the candidate of steps required to be taken by him/her.

#### **Transparency of the law-making process – Slovenia**

A series of texts, among which the government's Rules of Procedure, provide the basis for publication, including on-line, of legislative materials and public participation. The public is informed of planned legislative work through the Regulatory Programme of Government Work, which contains a list of proposed laws and other acts to be submitted to the National Assembly, along with procedures and deadlines for deliberation by the government, debate and adoption by the National Assembly. Most draft legislation and other acts are published by ministries on a single national E-democracy portal. Public participation is compulsory for all primary and secondary legislation. In addition to compulsory public participation, public debates may be organized when the issues to be regulated involve more stakeholders. Finally, via a dedicated online tool, the public may also propose to the government the adoption of a measure. A list of the experts who were consulted on draft legislation and regulations is made public. This is a good practice that should be highlighted.

## Selected good practice

### Corruption prevention in law enforcement agencies

#### **Risk management measures for corruption prone areas – Estonia**

Various measures are in place in Estonia to manage the risk of corruption and misconduct. These include the application of the four-eyes principle in services where there is a higher risk of corruption (migration services, services dealing with residence cards and permits, etc.), as well as for police patrols (i.e. patrols by a single police officer are not permitted), cameras at certain workplaces (i.e. where officials have frequent contacts with the public), IT log checks, the prohibition on cash transactions to pay fines (with the use of cash being only permitted in surveillance activities), and the responsibility of line managers and supervisors to ensure good behaviour of their subordinates. As of the beginning of 2018, all patrol officers are being equipped with body-worn cameras, to ensure appropriate behaviour in their contacts with the public.

#### **Law enforcement – integrity mainstreaming – The Netherlands**

Integrity is no longer considered as a separate element but as an integral part of "craftsmanship and professional responsibility" in the Netherlands law enforcement. Therefore, emphasis is put on setting clear guidelines and values, and explaining the goals behind rules. This enables employees to apply them in specific situations. The approach is broad: there are rules that are to be applied; there is policy on softer aspects, such as values and culture

(discussing dilemmas to increase moral consciousness); and, integrity is part of leadership development and professional responsibility. The National Police of the Netherlands (NPN) and the Royal Netherlands Marechaussee (KMar) have a strategy that is aimed at making ethical norms part of the daily job of employees and managers, based on a balance between compliance (standards, codes, procedures and enforcement) and discretionary powers for the professional. The integrity policy is updated annually.

#### **Gender-related and research-based policy-making – Iceland**

In Iceland, in the context of the Act on Equal Status and Equal Rights of Women and Men no. 10/2008, the National Police Commissioner and district commissioners have appointed special representatives on equal rights and the National Police Commissioner has established a special council of outside experts to address direct and indirect discrimination, harassment and gender-based violence within the police. The National Commissioner has adopted a policy and an action plan as well as special guidelines on gender equality. The last one, adopted in 2016, is currently under review. The National Commissioner produced in 2014 a research study on the work culture and gender relations (including sexual harassment) within the police force in cooperation with the University of Iceland. The study confirmed that women remain underrepresented in the police and that men are much less confronted with sexual harassment than their female colleagues.

**Gender diversity is key in the prevention of group-think and, in turn, of corruption.** GRECO has issued its first gender-related recommendations during the 5th Evaluation Round, so far aiming at increasing the representation of women at higher levels and ensuring their integration at all levels in the Police and Border Guard. As GRECO has sometimes pointed out in country reports, diversity has the potential of having positive effects on the overall working environment within an institution, making it more representative of the population as a whole. Women sometimes struggle to advance to higher posts, for instance due to their deployment to “softer” policing roles, which often means that ultimately they do not have the range of experience required for promotion. Greater efforts can be made to enhance diversity at all levels (for example by making diversity a criterion in deployment decisions, by developing and applying a gender equality or diversity strategy).

# SIGNIFICANT DEVELOPMENTS IN GRECO'S WORK IN 2018

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**T**he thematic focus has again been broadened with GRECO turning to “Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies” in its 5th Evaluation Round. Seven evaluation reports (Finland, Iceland, Latvia, Luxembourg, Estonia, the Netherlands, Poland) were adopted in that round in 2018 which, with the two adopted in 2017, brings the total number of 5th Round evaluation reports adopted to nine.

**GRECO adopted and published ad hoc evaluation reports in respect of two countries.** These reports, which made the headlines across Europe and the US, touched upon very topical and critical issues as they were emerging in two member states (Poland and Romania). In the case of Romania, GRECO issued a number of recommendations relating to the justice reform. GRECO was equally concerned by the objectives pursued by certain draft amendments to the criminal law (substantive and procedural) and the legislative process initiated in December 2017 in that respect, due to their potential for having a negative impact on the country’s anti-corruption efforts. GRECO will review the implementation of its recommendations to Romania (both in the ad hoc and compliance procedures) in June 2019. As regards Poland, GRECO concluded that the amendments to the Laws on the National Council of the Judiciary, the Supreme Court and the Organisation of Ordinary Courts enabled the legislative and executive powers to influence the functioning of the judiciary in Poland in a critical manner, thereby significantly weakening the independence of the judiciary. Some positive developments that responded to GRECO efforts could be noted in Poland, and the decision at the end of 2018 by the authorities to reinstate the judges of the Supreme Court, which was in line with GRECO’s recommendations, was welcomed. These ad hoc evaluations were not issued in isolation, as both the Venice Commission and the European Commission delivered reports along very similar lines, thus contributing to our collective efforts to preserve judicial independence in compliance with Council of Europe anti-corruption standards.

**GRECO updated its Guidelines for Evaluation Teams in view of the new evaluation round.** They now include principles of conduct during the evaluation process which cover issues such as professionalism and general values; impartiality, objectivity, neutrality; conflicts of interest and incompatibilities; personal benefits and gifts; confidentiality; general precautions; and an enforcement mechanism. With the adoption of principles of conduct, GRECO is practising itself what it preaches to all its member states.

**It is to be welcomed that anti-corruption issues have been borne in mind in many parts of the Council of Europe.** GRECO and/or its Secretariat actively contributed to this work. The Independent Investigation Body on the allegations of corruption within the Parliamentary Assembly (PACE) “strongly endorsed” GRECO’s 2017 recommendations to PACE and called for their full implementation. The PACE Political Affairs and Democracy Committee adopted a Declaration on the establishment of an academic network on the Council of Europe conventions against corruption.<sup>5</sup> In its Resolution 2200(2018), PACE has asked FIFA and UEFA to take GRECO expertise into account to strengthen their governance and integrity frameworks.<sup>6</sup> The fight against corruption was also high on the agenda of the Croatian Chairmanship of the Committee of Ministers (May to November 2018). The highlight was a High-Level Conference on “Strengthening transparency and accountability to ensure integrity: united against corruption” which took place in Šibenik (Croatia) in October 2018. On that occasion, a Network of national anti-corruption authorities was set up. At their 15th Conference in Tbilisi in November 2018, the Council of Europe Ministers of Sport called on the Committee of Ministers to “initiate the preparation of a study focusing on the legal and policy measures needed to effectively prevent and fight corruption.” The European Committee on Democracy and Governance (CDDG) is working on guidelines on public ethics with an Appendix containing concrete measures in relation to securing high standards of ethical conduct across the public sector. This work will build on GRECO findings and recommendations, among others.

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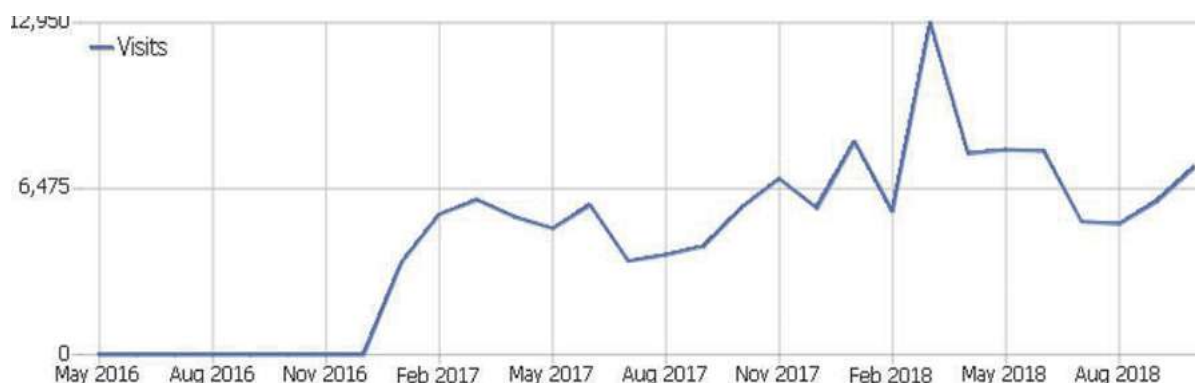
5. See <http://website-pace.net/documents/18848/4646402/20180522-DeclarationCorruption-EN.pdf/c6aa7b6d-1e6c-4033-b0bc-3617c060cbcd>  
6. See <http://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-EN.asp?fileid=24444&lang=en>

Externally, GRECO has continued to attach great importance to ensuring cooperation and synergies with the other international anti-corruption monitoring bodies in the UN, OECD and OAS, within the boundaries of our respective statutory requirements. GRECO has continued to coordinate meetings and evaluation dates, exchanged information and experiences on evaluation methodologies, and organised joint events where possible. The GRECO Secretariat hosted an inter-secretariat meeting with the UNODC, OECD and OAS in early January 2018, and participated in a Panel discussion on international anticorruption mechanisms organised by the OAS. GRECO facilitated and led the Council of Europe’s support to the setting up and launch of the UN’s Global Judicial Integrity Network. GRECO, in co-operation with the Venice Commission and the Consultative Council of European Judges (CCJE), put together a seminar on transparency of the judiciary in this context. While participation of the EU in GRECO remains pending, the EU’s Fundamental Rights Agency (FRA) organised its Fundamental Rights Forum in September 2018 including a focus on the negative impact of corruption on the enjoyment of Human Rights. In his concluding statement, FRA’s Chair called upon countries to fully implement GRECO’s recommendations.<sup>7</sup> Other developments include exchanges of information on topics of common interest between the OECD Working Group on Bribery in International Business Transactions (WGB) and Working Party of Senior Public Integrity Officials (SPIO) and GRECO; GRECO Secretariat participation, together with the European Partial Agreement on Sport (EPAS), in the International Partnership against Corruption in Sport, with a particular focus on ensuring transparency and integrity in the selection of major sporting events making use of GRECO evaluation reports on the countries concerned (where available); GRECO President participation in the OECD’s 2018 Global Anti-Corruption and Integrity Forum; and mutual exchanges with the G20 Anti-Corruption Working Group under the Argentinian Presidency. Globally, GRECO evaluation and compliance reports could also be used as a yardstick for countries in their efforts to achieve the Sustainable Development Goal 16, target 16.5 “Substantially reduce corruption and bribery in all their forms”.

**In 2019, GRECO may add a new member state.** Indeed, in 2018, Kazakhstan was a step closer to completing its accession process to GRECO, with the adoption by the Committee of Ministers in December 2018 of an Agreement on privileges and immunities of GRECO members and members of the evaluation teams – which paves the way for Kazakhstan to join GRECO in the not too distant future.

**GRECO’s media presence is sustained and growing.**<sup>8</sup> Communication (through traditional and social media) is embedded in GRECO’s work and allows information about GRECO’s recommendations to be widely spread and debated. While GRECO’s reports are only published with the consent of the country concerned, all countries but one (Belarus) allow publication and do so rather swiftly after the adoption of the report. Statistics show that the number of visits of GRECO’s website has increased dramatically over the last two years with significant peaks generated by the publication of country reports (see below). A similar positive trend is observed in respect of GRECO’s new Newsletter (with a quality index of 76/100 at December 2018 (source: Dolist)) which is increasingly in demand and praised by readers.

Visits Summary GRECO website (source: Matomo)



7. See [https://www.coe.int/en/web/greco/home/newsroom/-/asset\\_publisher/yxhkEPo3SNnS/content/fra-european-union-agency-for-fundamental-rights-and-greco?inheritRedirect=false&redirect=https%3A%2F%2Fwww.coe.int%2Fen%2Fweb%2Fgreco%2Fhome%2Fnewsroom%3Fp\\_id%3D101\\_INSTANCE\\_yxhkEPo3SNnS%26p\\_p\\_lifecycle%3D0%26p\\_p\\_state%3Dnormal%26p\\_p\\_mode%3Dview%26p\\_p\\_col\\_id%3Dcolumn-4%26p\\_p\\_col\\_count%3D1](https://www.coe.int/en/web/greco/home/newsroom/-/asset_publisher/yxhkEPo3SNnS/content/fra-european-union-agency-for-fundamental-rights-and-greco?inheritRedirect=false&redirect=https%3A%2F%2Fwww.coe.int%2Fen%2Fweb%2Fgreco%2Fhome%2Fnewsroom%3Fp_id%3D101_INSTANCE_yxhkEPo3SNnS%26p_p_lifecycle%3D0%26p_p_state%3Dnormal%26p_p_mode%3Dview%26p_p_col_id%3Dcolumn-4%26p_p_col_count%3D1)

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



# FEATURE ARTICLE

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## **The Opportunities and Challenges of Blockchain in the Fight against Government Corruption**

*Nikita Aggarwal and Luciano Floridi*

Digital Ethics Lab, Oxford Internet Institute

**B**roadly defined, government corruption is the abuse of public power for private gain. It can assume various forms, including bribery, embezzlement, cronyism, and electoral fraud. At root, however, government corruption is a problem of *trust*. Corrupt politicians abuse the powers entrusted to them by the electorate (the principal-agent problem). Politicians often resort to corruption out of a lack of trust that other politicians will abstain from it (the collective action problem). Corruption breeds greater mistrust in elected officials amongst the public. The problem of trust is compounded where a lack of transparency and asymmetric information impede effective control over the exercise of public powers.

### **The Blockchain Opportunity**

The question arises whether distributed ledger technology (DLT), such as blockchain, could aid the fight against government corruption. In brief, a distributed ledger is a decentralized database, held across a peer-to-peer network of computer devices, or 'nodes'. Each node in the network holds an identical copy of the database, and independently validates and records transactions on the network, using a combination of economic incentives, cryptographic proofs, and an algorithmic consensus mechanism. Blockchain is a type of DLT that organizes transaction records in a chronological, timestamped chain of 'blocks'. It is open source and publicly accessible ('permissionless'): transactions are transparent (although pseudonymized), and anyone can participate in the blockchain.<sup>9</sup>

There are many potential advantages of blockchain. These include greater transparency and security of data, due to the use of encryption, cryptography, and its decentralized nature, which makes the network less vulnerable to the failure of a single node. Blockchain is also effectively tamper-proof: since each record is linked to all previous records on the ledger, it cannot be altered without repeating the costly and computationally impractical process of validating all other blocks in the chain. However, the core opportunity of blockchain is that it facilitates 'trustless' transactions. Unrelated people can reach agreement and coordinate their activities without needing to know or trust one another, and without requiring a central coordinating authority.

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9. In contrast, 'permissioned' and 'private' blockchains restrict participation (write-controlled) and/or visibility (read-controlled). Whilst initially conceived to facilitate peer-to-peer financial transactions using Bitcoin, blockchain has since been adapted to support a much wider range of P2P transactions. For example, Ethereum is a public, permissioned blockchain-based platform that facilitates non-financial transactions, notably Smart Contracts and Distributed Applications (see <https://www.ethereum.org>).

Where government corruption is rooted in an abuse of trust by elected representatives, it stands to reason that corruption would be eradicated in a blockchain-based government, as power is not entrusted to any centralized institutions. Indeed, the original objective of the Bitcoin blockchain was to disintermediate the financial institutions and ‘trusted elites’ that many blamed for causing the 2008 financial crisis.<sup>10</sup> For now, the cyberlibertarian vision of a fully decentralized, ‘techno-democracy’ remains an unlikely prospect. In the meantime, however, blockchain offers to reduce government corruption by *augmenting*, rather than *substituting*, the existing institutions and processes of government.

For example, blockchain-based voting platforms could reduce the scope for corruption in elections by providing a tamper-proof record of votes and voters that does not rely on verification by a third party (e.g. vote counters, local and federal election authorities). The greater transparency and efficiency afforded by such platforms also promises to boost voter turnout, and to increase trust in the democratic process, particularly in countries where election results are often contested. Blockchain-based voting platforms have recently been piloted in Japan, Switzerland and the US (West Virginia), amongst others.<sup>11</sup>

Similarly, countries such as Brazil, Honduras, Ukraine and Georgia are experimenting with blockchain-based land registries, which provide greater legal certainty to land titles, and reduce the scope for corruption due to double-allocation of land and forged land deeds.<sup>12</sup> Likewise, blockchain-based health care, identity management, public procurement and contracting, refugee aid delivery, and social welfare payment systems, all stand to reduce the scope for government corruption.

## Five Challenges of Blockchain

Yet blockchain is not a panacea. There are at least five salient challenges. The first of these concerns the incentives of incumbent governments to adopt blockchain technology. Governments may be reluctant to create an immutable and transparent record of their activities if this constrains their scope for private gain through corruption. As such, the promise of blockchain depends on the strength and integrity of a country’s existing institutions to deploy the technology in the first instance. Moreover, the effectiveness of a blockchain-based platform depends on the wider regulatory and political context, as well as the strength of a country’s (digital) infrastructure – the Internet, distributed and cloud computing, electricity supply, and digitized data, all of which power the blockchain, as well as the technological literacy of its population.

Indeed, early evidence from blockchain-based land registries points to greater success in countries with strong institutions and infrastructure – such as Georgia, where most land is already documented and the property registration process relatively streamlined and digitally-enabled. Blockchain itself does not provide a mechanism for recognizing land rights, nor for digitizing or ensuring the accuracy of data relating to land rights. Clearly, blockchain works best by becoming part of a virtuous cycle through which a not-very corrupt government introduces blockchain to reduce corruption, which in turn incentivizes greater uptake of blockchain, and further reduces corruption.

The second challenge relates to the governance and politics of blockchain technology itself. In a blockchain-based system, trust in government institutions and elected representatives is replaced by trust in the administrators of the blockchain: the network of nodes, source code, cryptographic tools, consensus mechanisms and private actors through which the blockchain operates. The operation of a blockchain-based platform is thus subject to the decisions of its developers, for example to upgrade the code or alter the consensus mechanism (a so-called ‘hard’ or ‘soft fork’), as well as the motivations of node operators in validating and recording transactions.<sup>13</sup> It is noteworthy that network power on the Bitcoin blockchain is highly concentrated: by some accounts, as few as 6 groups of nodes (‘mining pools’) record or ‘mine’ 80% of the transactions (as well as being geographically concentrated, in China).<sup>14</sup> Likewise, the number of validation nodes is steadily falling, and becoming increasingly concentrated in the US and Europe.<sup>15</sup>

As such, political power on the blockchain is not truly decentralized, but rather re-centralized in a ‘tech elite’ — creating a new avenue for corruption through the abuse of their powers. Re-centralization furthermore reintroduces the security risks that are mitigated through decentralization and distribution of power. And,

10. Satoshi Nakamoto, Bitcoin: A Peer-to-Peer Electronic Cash System (2008) <https://bitcoin.org/bitcoin.pdf>.

11. See <https://blockchain.ge/curatedexamples.html?sector=elections-voting>.

12. See for example <https://exonum.com/napr>.

13. See [https://en.wikipedia.org/wiki/Fork\\_\(blockchain\)](https://en.wikipedia.org/wiki/Fork_(blockchain)).

14. See Kaiser, Jurado and Ledger, ‘The Looming Threat of China: An Analysis of Chinese Influence on Bitcoin’ (2018), <https://arxiv.org/abs/1810.02466>, at 2.

15. See <https://bitnodes.earn.com>.

although cryptographic tools and algorithmic consensus mechanisms offer security advantages, blockchain is not failsafe to an attack from malicious actors. This could occur either within the blockchain (for example, if attacker nodes take control of a majority of the computational power and cooperate to attack the network), or via software clients, third-party applications (such as cryptocurrency wallets) and smart contracts – as evidenced by the 2016 hack of the DAO, an investment fund operating on the Ethereum blockchain. More generally, the greater dependence on the Internet and computing entailed by the use of blockchain elevates cybersecurity risks in public administration.

The third challenge concerns an evident trade-off between decentralization, security, and scalability: the so-called blockchain ‘trilemma’.<sup>16</sup> The more decentralized the blockchain is, the less scalable it is. For example, the highly decentralized Bitcoin blockchain is a slow system for validating transactions (through the Proof-of-Work consensus mechanism), and requires a considerable amount of computing power, making it less scalable.<sup>17</sup> These trade-offs have given rise to different forms of blockchain – notably, private and permissioned blockchains, which are typically faster, more energy efficient and secure than public blockchains. However, these blockchains are more centralized and as such do not support truly ‘trustless’ transactions. Changes to the blockchain designed to increase scalability (for example, through a hard fork) also raise governance questions relating to trust in miners and control of the network.

Fourthly, the use of cryptocurrencies, which run on DLT, give rise to a parallel set of public governance risks. Notably, the relative anonymity afforded by certain cryptocurrencies – such as Bitcoin and Ether – makes them more susceptible to use for money laundering and financing illicit activities, such as drug trafficking and terrorism, and frustrates regulatory efforts to prosecute them. Likewise, blockchain-based cryptocurrencies could themselves facilitate government corruption – for example, allowing elected officials to obfuscate more easily the identity of political donors and the sources of campaign funds. These concerns could, however, be partially addressed through the use of non-anonymous cryptocurrencies (such as the stablecoin Saga), and private or permissioned blockchains.<sup>18</sup>

Finally, there remains considerable legal and regulatory uncertainty over blockchain-based transactions. Inter alia, the difficulty of altering the blockchain makes it unclear how the ‘right to erasure’ under EU data privacy law will be enforced (Article 17, GDPR). Additionally, the distributed nature of the blockchain gives rise to conflict of laws questions, as the nodes are located across several different jurisdictions. Likewise, it remains unclear who will be held liable when the network malfunctions.

## Conclusion

The decentralized, encrypted and immutable nature of DLT, such as blockchain, makes it more difficult for centralized government institutions to regulate and control. Paradoxically, this presents both opportunities and challenges in the fight against government corruption, as this article has highlighted. Moreover, blockchain is not a one-size-fits-all solution. Different types of blockchain (public versus private/federated, permissioned versus permissionless) will be more or less suitable for different use cases. In some contexts, more fundamental infrastructural needs – for example, Internet access and digital identity – will need to be resolved first, before the deployment of blockchain and DLT-based platforms can be considered. At this nascent stage in the technology’s growth, governments are advised to adopt an attitude of cautious optimism: embracing pilot studies and investing more in understanding blockchain technology, whilst remaining alert to its risks and challenges.

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*The Digital Ethics Lab is an interdisciplinary research lab based at the Oxford Internet Institute, University of Oxford. Its aim is to identify the benefits and enhance the positive opportunities of digital innovation as a force for good, and avoid or mitigate its risks and shortcomings.*

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16. Vitalik Buterin (Ethereum co-founder) <https://github.com/ethereum/wiki/wiki/Sharding-FAQs>

17. Compare transaction processing on the Bitcoin and Ethereum blockchains (up to 15 transactions processed per second) with a system such as Visa (24,000 transactions per second)

18. See <https://www.saga.org/>.

# WORKING FRAMEWORK

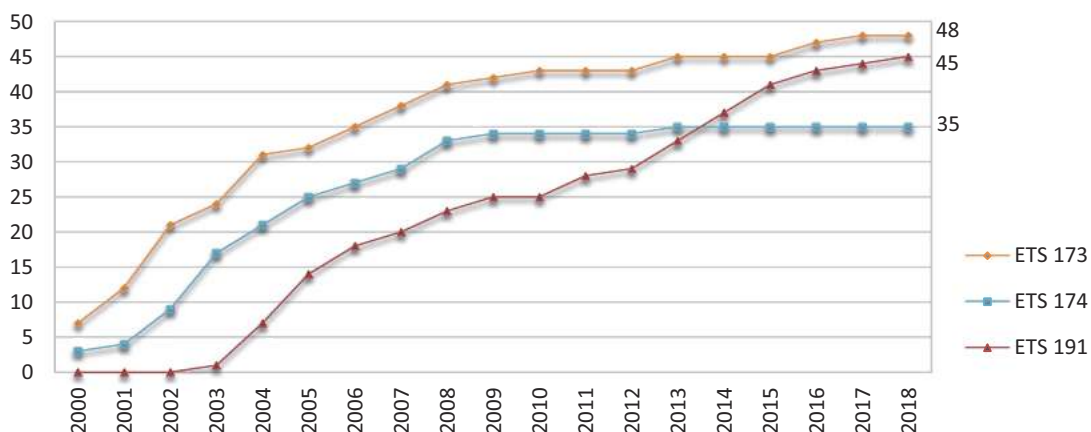
## Anti-corruption standards of the Council of Europe

The three unique treaties developed by the Council of Europe deal with corruption from the point of view of criminal, civil and administrative law. Corruption is seen not only as a threat to international business or to financial interests but to the values of democracy, human rights and the rule of law that are upheld by the Organisation. The **Criminal Law Convention on Corruption** (ETS 173) sets out common standards for corruption offences – among others, the establishment of criminal offences for active and passive bribery (as well as aiding and abetting in such offences) of domestic public officials, domestic public assemblies, foreign public officials, foreign public assemblies, members of international parliamentary assemblies and judges and officials of international courts; for active and passive bribery in the private sector and for trading in influence. Parties to the convention are required to provide for corporate liability, the protection of collaborators of justice and witnesses and to establish in respect of the above offences effective, proportionate and dissuasive sanctions. An **Additional Protocol** to ETS 173 (ETS 191) requires the establishment of criminal offences for active and passive bribery of domestic and foreign arbitrators and jurors.

The **Civil Law Convention on Corruption** (ETS 174) deals with compensation for damage, liability, contributory negligence, limitation periods, the validity of contracts, protection of employees, accounts and auditing, the acquisition of evidence, interim measures and international cooperation in relation to corruption defined as “requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or prospect thereof, which distorts the proper performance of any duty or behaviour required of the recipient of the bribe, the undue advantage or the prospect thereof”.

Within GRECO, the same evaluation criteria and level of detailed scrutiny apply to states whether they have ratified these treaties or not. To date, all Council of Europe member States and Belarus (i.e. nearly all GRECO members) have ratified the Criminal Law Convention on Corruption (ETS 173). No reservations to the treaty were withdrawn or became obsolete in 2018. The United States of America signed it (in 2000). In 2018, the Czech Republic ratified the Additional Protocol to the Criminal Law Convention (ETS 191). There were no further signatures/ratifications of the Civil Law Convention on corruption.

Number of ratifications - Conventions ETS 173, ETS 174 and ETS 191



As already pointed out in last year's report, while it is welcomed that the Criminal Law Convention and its Protocol are widely ratified, it is regrettable that 14 GRECO member States have still not ratified the Civil Law Convention on Corruption despite its importance for the public, private (business) and not-for-profit sectors. The graph above shows that the impetus of the ratification process basically stalled 10 years ago, and GRECO might decide in due course to revive that process e.g. through specific measures to promote the Convention on the occasion of an event, or basing a future evaluation round on the Convention. Likewise, while it is not a treaty that GRECO evaluates, it is regrettable that the number of parties to the Council of Europe Convention on the Manipulation of Sports Competitions (CETS 215) remains very low (three) even though corruption and integrity cases affecting sports events, and competition-related business more generally, have never been so frequently and prominently in the public eye.

Those treaties are complemented by the following legal instruments:

- ▶ **Twenty Guiding Principles** for the fight against Corruption (Committee of Ministers Resolution (97) 24)
- ▶ Recommendation on **Codes of Conduct for Public Officials** (including a model code) (Committee of Ministers recommendation to member States No. R(2000) 10)
- ▶ Recommendation on **Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns** (Committee of Ministers recommendation to member States Rec(2003)4)

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

- ▶ Convention on the **Manipulation of Sports Competitions** (CETS 215)
- ▶ Recommendation on the **Protection of Whistleblowers** (Committee of Ministers recommendation to member States CM/Rec(2014)7)
- ▶ Consultative Council of European Prosecutors (Rome Charter) Opinion on **European Norms and Principles concerning Prosecutors** (CCPE Opinion No. 9)
- ▶ Consultative Council of European Judges Opinions on **The Position of the Judiciary and its Relations with other Powers of State in a Modern Democracy** (CCJE Opinion No. 18) and **The Role of Court Presidents** (CCJE Opinion No. 19)
- ▶ Recommendation on **the Legal Regulation of Lobbying Activities in the Context of Public Decision-making** (Committee of Ministers recommendation to member States CM/Rec(2017)2)

Council of Europe Treaty Office : [www.conventions.coe.int](http://www.conventions.coe.int)

## Methodology – Evaluation

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

## Methodology – Compliance

In the compliance procedure, GRECO monitors the implementation of the recommendations it has issued to the country in the evaluation report. The assessment of whether a recommendation has been implemented satisfactorily, partly or has not been implemented is based on a situation report, accompanied by supporting documents submitted by the member under scrutiny. In cases where not all recommendations have been complied with, GRECO will re-examine outstanding recommendations. Compliance reports adopted by GRECO also contain an overall conclusion on the implementation of all the recommendations, the purpose of which is to decide whether to terminate the compliance procedure in respect of a particular member. For the new 5th evaluation round, if at least 2/3 of the recommendations have been implemented satisfactorily or dealt with in a satisfactory manner, GRECO shall terminate the compliance procedure. The Rules of Procedure of GRECO foresee a special procedure, based on a graduated approach, for dealing with members whose response to GRECO's recommendations has been found to be globally unsatisfactory. These Rules also include

a new provision allowing GRECO to act on an ad hoc basis when an institutional reform, legislative initiative or procedural change by a member State might result in a serious violation by that member of a Council of Europe anti-corruption standard.

## Evaluation Rounds<sup>19</sup>

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

### **5th Evaluation Round** (launched on 1 January 2017)

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

*Central government (top executive functions)*

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

*Law enforcement agencies*

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

### **4th Evaluation Round** (launched on 1 January 2012)

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

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

### **3rd Evaluation Round** (1 January 2007-31 December 2011)

*Theme I: Incriminations*

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

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

### *Theme II: Political funding*

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

#### **2nd Evaluation Round** (1 January 2003-31 December 2006)

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

#### **1st Evaluation Round** (1 January 2000-31 December 2002)

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

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

### **Publication of reports**

Raising awareness of GRECO's findings across society prompts domestic debate and support for the implementation of its recommendations. The long-standing practice whereby GRECO member States – with rare exceptions – lift the confidentiality of reports shortly after their adoption and translate them into national languages goes well beyond what was originally provided for in the Rules of Procedure. The release of a report for publication is coordinated with the member State concerned and the Directorate of Communication of the Council of Europe to maximise media attention; this helps raise awareness in society and the institutions concerned about the expected reforms which can in turn contribute to increasing support for their adoption and implementation. In the rare case that a country persistently refuses to authorise the publication of a report, GRECO has decided to publish a summary of it (e.g. Belarus in 2017).

# GOVERNING STRUCTURES AND MANAGEMENT

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

## Plenary and Bureau

GRECO elects a President, Vice-President and Bureau for each new evaluation round. The positions of President and Vice-President for the duration of the 5th Evaluation Round were taken up, on 1 January 2017, by Marin MRČELA, Vice-President of the Supreme Court of Croatia and Agnès MAITREPIERRE, *Chargée de Mission*, Directorate of Legal Affairs, Ministry for Europe and Foreign Affairs of France, respectively. In 2018, the Bureau was composed of the President, Vice-President, and Helena KLIMA-LIŠUCHOVÁ, Ministry of Justice of the Czech Republic; Aslan YUSUFOV, Office of the Prosecutor General of the Russian Federation; Vita HABJAN BARBORIČ, Commission for the Prevention of Corruption of Slovenia; Ernst GNAEGI, Federal Ministry of Justice of Switzerland; and David MEYER, Ministry of Justice of the United Kingdom.

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

## Statutory Committee – Budget and Programme of Activities

The Statutory Committee is composed of the Permanent Representatives of all Council of Europe member States (the Committee of Ministers) and representatives of the two GRECO member States that are not members of the Organisation (Belarus and the United States of America). Its principle task is to adopt GRECO's programme and budget which is prepared in line with the biennial method implemented throughout the Organisation and based on priorities presented by the Secretary General. The Statutory Committee, chaired in 2018 by Miroslav PAPA, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of Croatia to the Council of Europe, met twice and approved GRECO's biennial programme 2018-2019 and budget for 2019.

## Secretariat

The Secretariat, headed by Gianluca ESPOSITO, Executive Secretary, provides support, guidance and technical, legal advice to countries participating in GRECO's monitoring work and is responsible for the management of the budget and programme of activities, as well as external relations (organisational chart of GRECO's Secretariat – Appendix 6).





# APPENDICES

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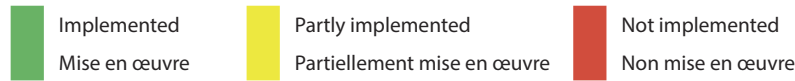
## Appendix 1 – GRECO'S Mission

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

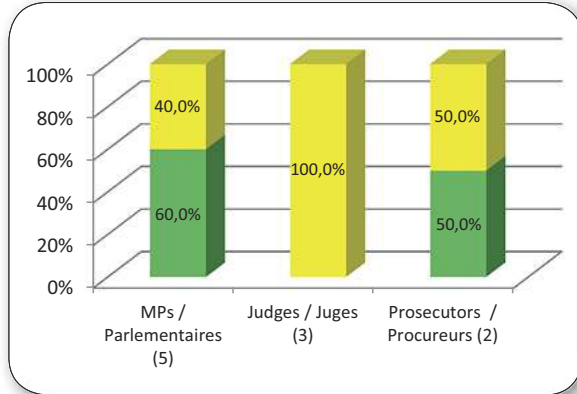
The clear stated political objective of strengthening the capacity of member States to prevent and fight corruption is served by a monitoring model designed to provide each member State with a detailed analysis and set of recommendations that are tailored to the specific architecture of each country. Subsequent "compliance procedures" serve to verify achievements and actively push for alignment with what is recommended. Multiple layers of result validation and a high level of process ownership are salient features of this model, where the dynamics of mutual evaluation and peer pressure are brought into play.

## Appendix 2 – 4th Round Implementation Statistics

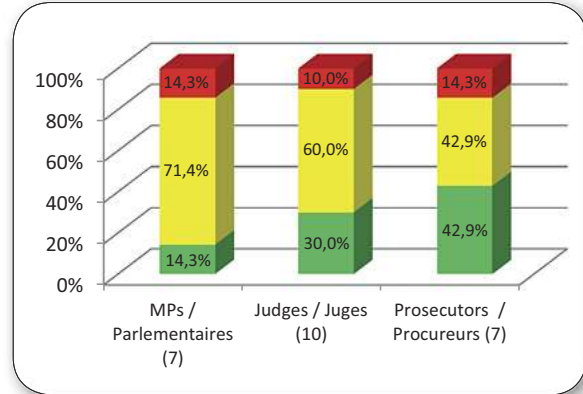
Statistics covering all assessments made public by end 2018 – 35 member States<sup>20</sup>



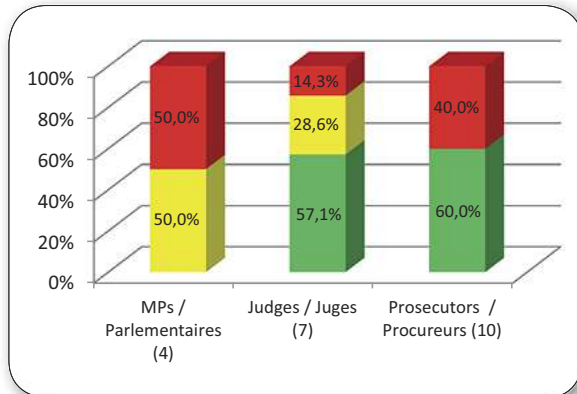
**Albania/Albanie (2018)**



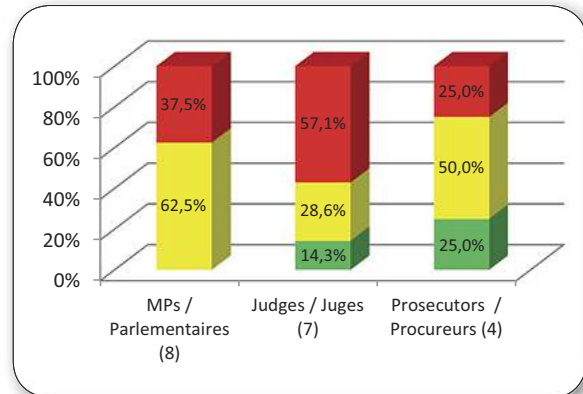
**Armenia/Arménie (2017)**



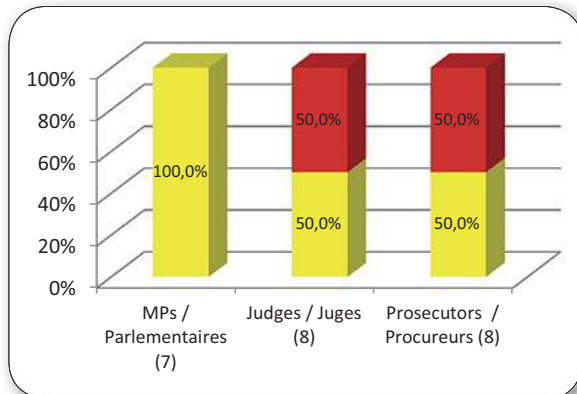
**Azerbaijan/Azerbaïdjan (2017)**



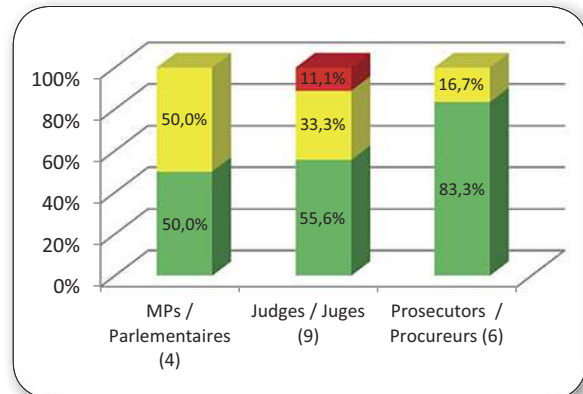
**Belgium/Belgique (2018)**



**Bosnia and Herzegovina/Bosnie-Herzégovine (2018)**

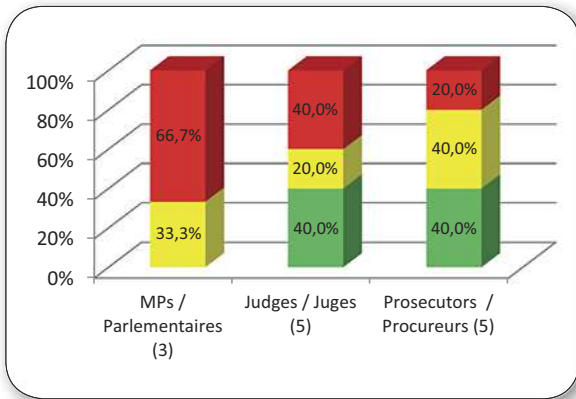


**Bulgaria/Bulgarie (2017)**

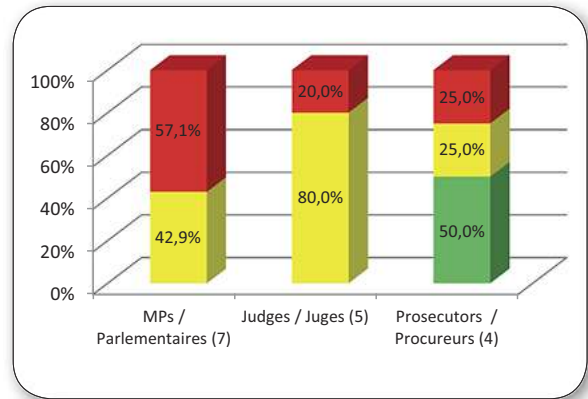


20. The numbers in brackets refer to the number of recommendations issued under each category. The year refers to the year in which the most recent assessment was made/made public. The countries concerned are at various stages of the 4th round compliance procedures, and in the case of Estonia, Finland, Slovenia, Sweden and the United Kingdom the procedure is closed.

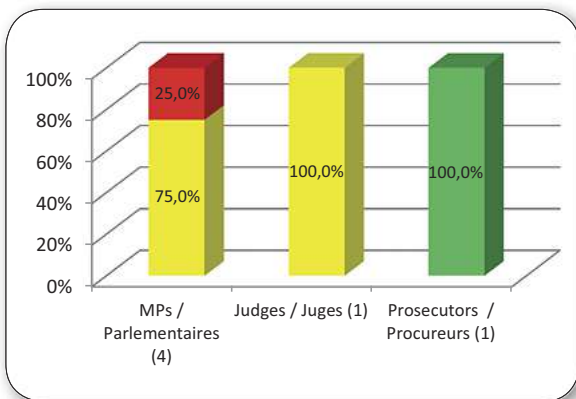
**Croatia/Croatie (2016)**



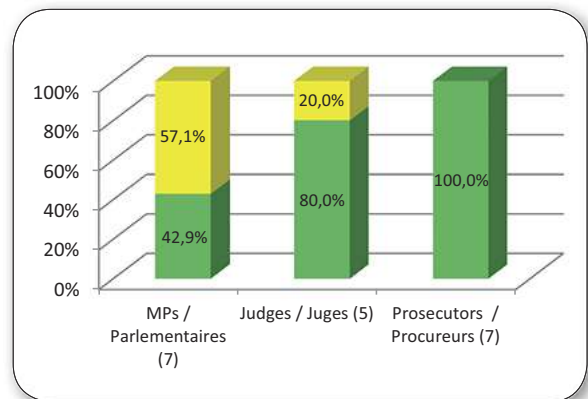
**Cyprus/Chypre (2018)**



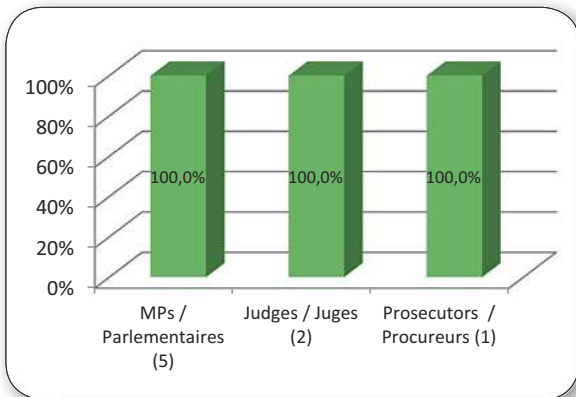
**Denmark/Danemark (2018)**



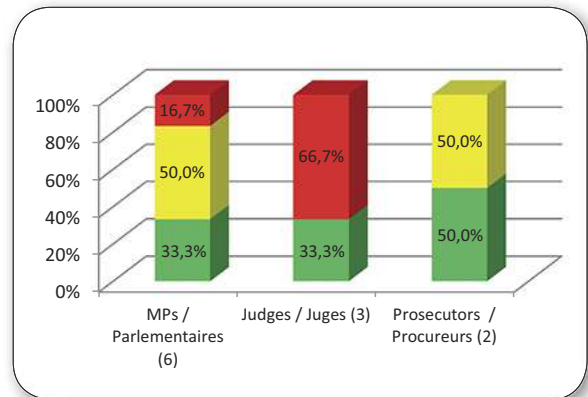
**Estonia/Estonie (2017)**



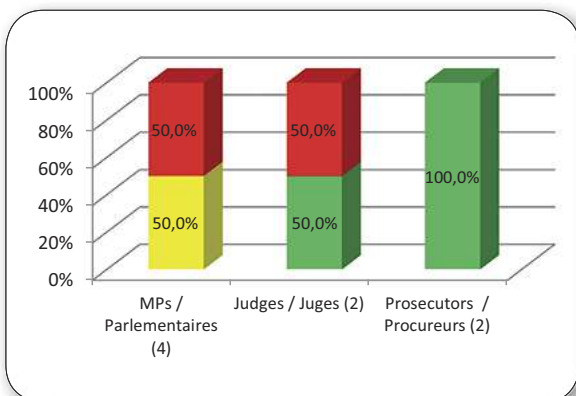
**Finland/Finlande (2017)**



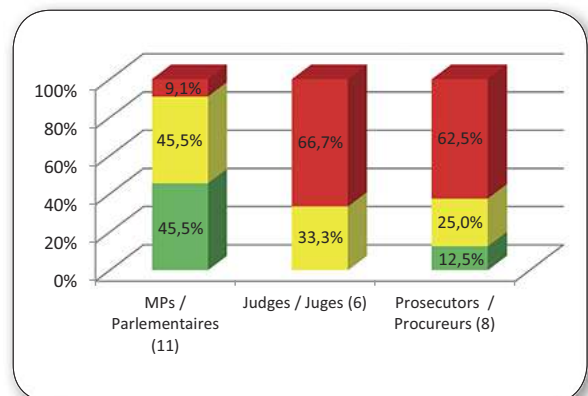
**France (2018)**



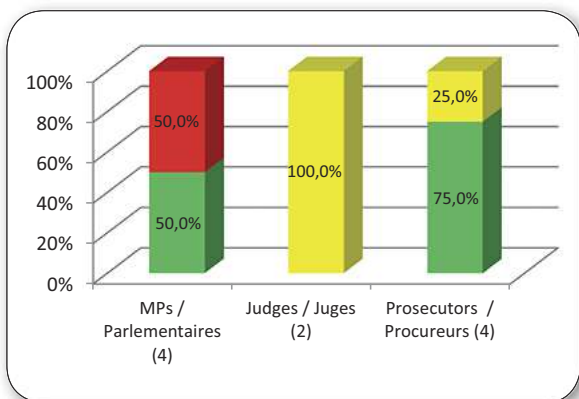
**Germany/Allemagne (2017)**



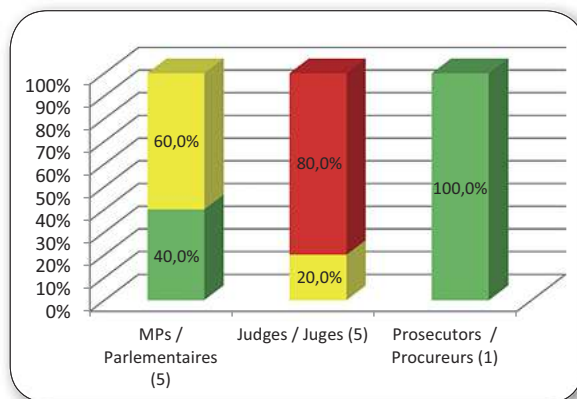
**Greece/Grèce (2018)**



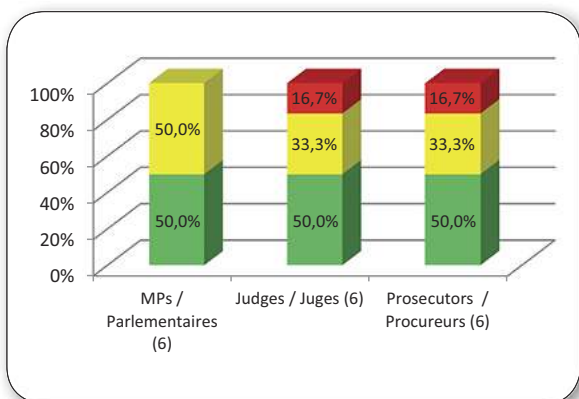
**Iceland/Islande (2017)**



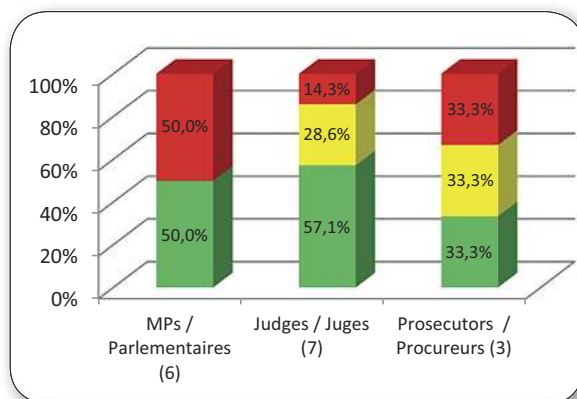
**Ireland/Irlande (2018)**



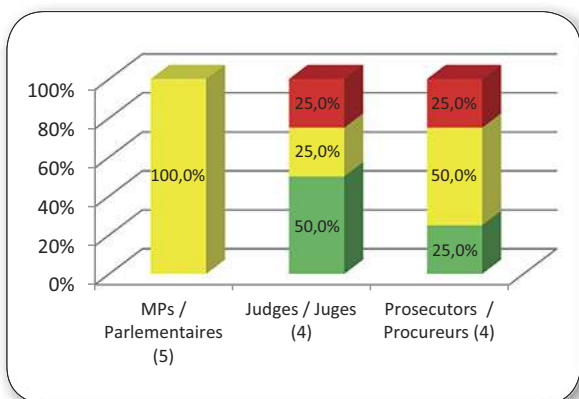
**Italy/Italie (2018)**



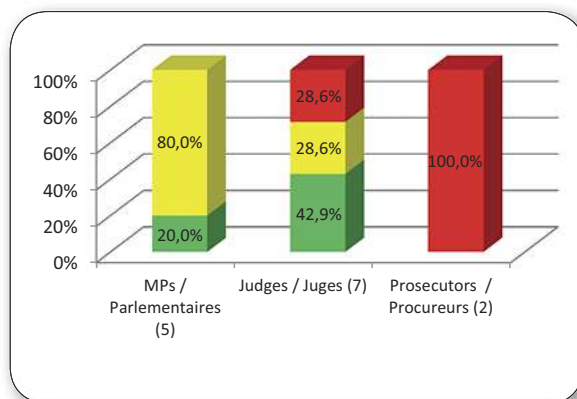
**Latvia/Lettonie (2017)**



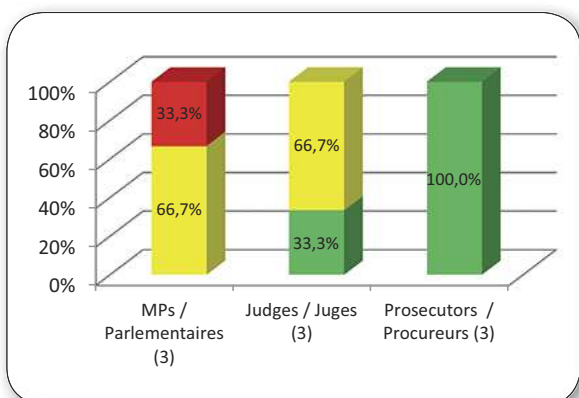
**Lithuania/Lituanie (2017)**



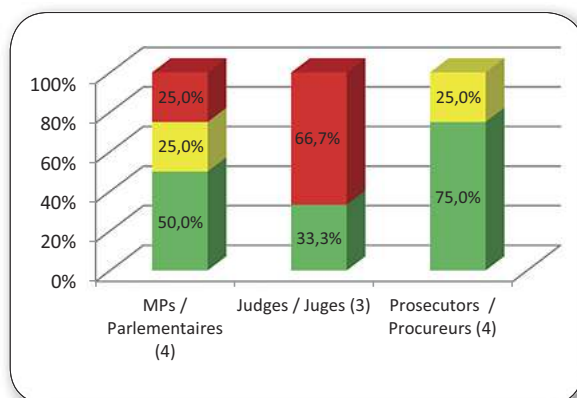
**Luxembourg (2017)**



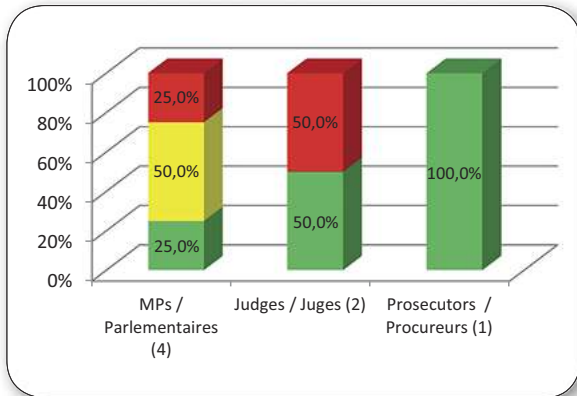
**Malta/Malte (2017)**



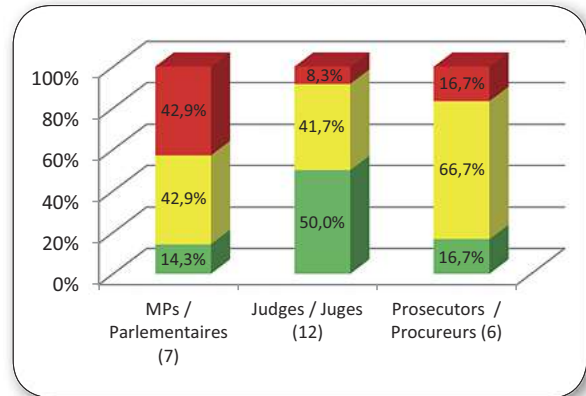
**Montenegro/Monténégro (2018)**



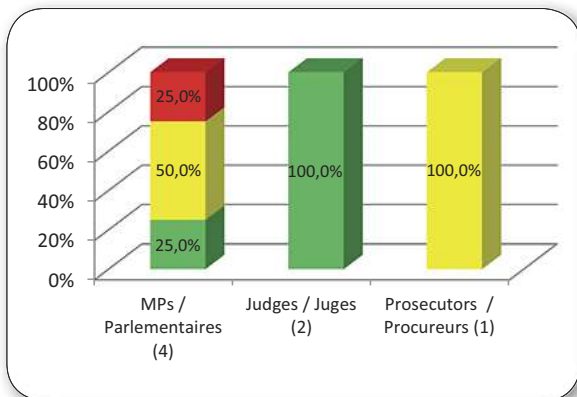
**Netherlands/Pays-Bas (2018)**



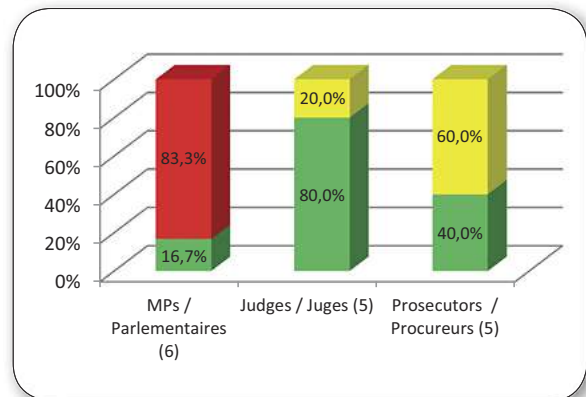
**North Macedonia/Macédoine du Nord (2018)**



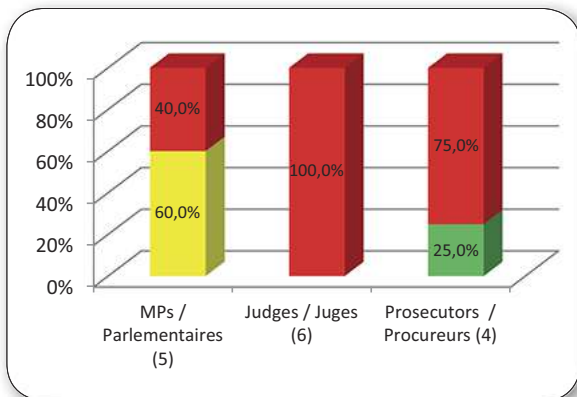
**Norway/Norvège (2016)**



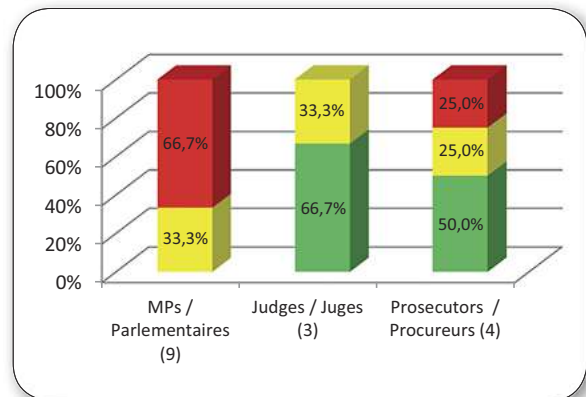
**Poland/Pologne (2018)**



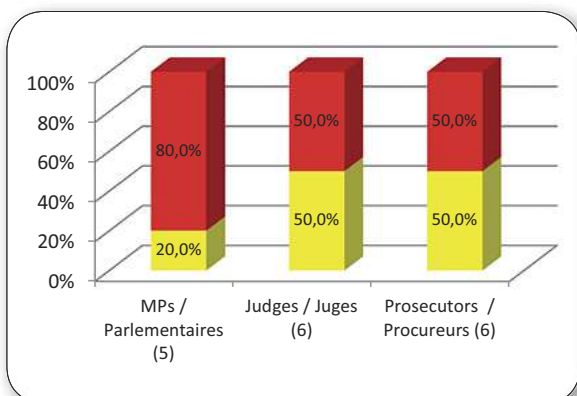
**Portugal (2018)**



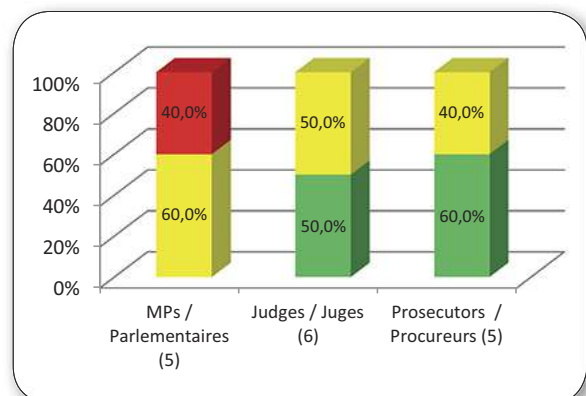
**Romania/Roumanie (2018)**



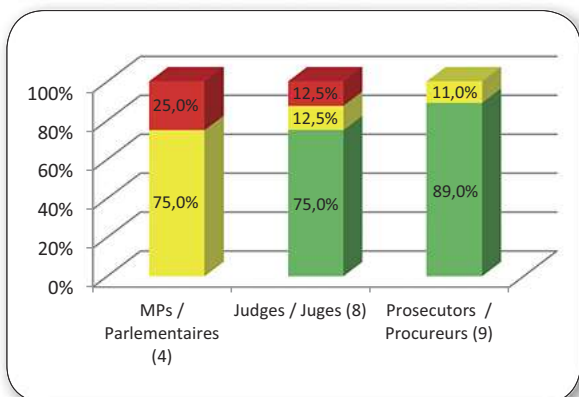
**Serbia/Serbie (2018)**



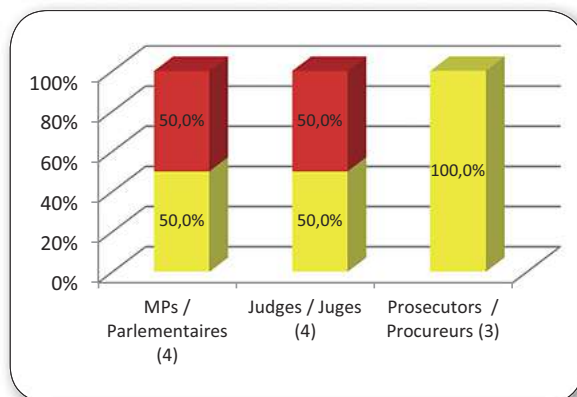
**Slovak Republic/République slovaque (2017)**



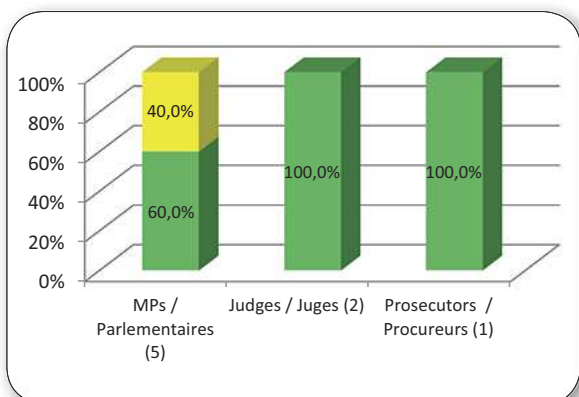
**Slovenia/Slovénie (2018)**



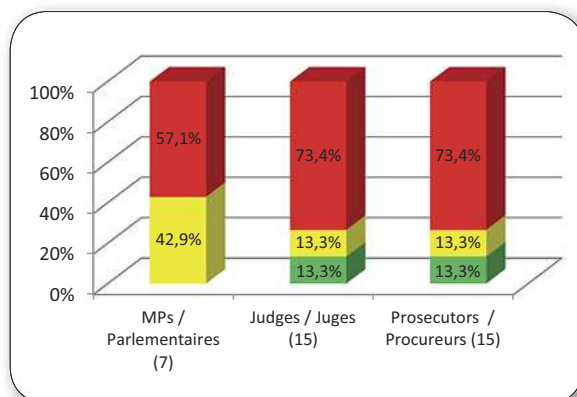
**Spain/Espagne (2018)**



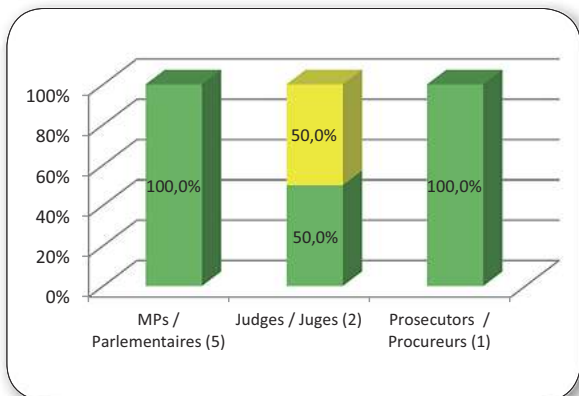
**Sweden/Suède (2017)**



**Turkey/Turquie(2018)**



**United Kingdom/Royaume-Uni (2017)**



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

## Appendix 3 – Core Programme

### On-site evaluation visits in 2018

#### 5th Evaluation Round

- ▶ Poland (26 February-2 March)
- ▶ Estonia (23-27 April)
- ▶ Netherlands (14-18 May)
- ▶ Sweden (18 May-1 June)
- ▶ North Macedonia (1-5 October)
- ▶ Malta (1-5 October)
- ▶ Denmark (12-16 November)
- ▶ Slovak Republic (12-16 November)

#### Rule 34 – ad hoc procedure in exceptional circumstances

- ▶ Romania (21-22 February)
- ▶ Poland (14-16 May)

### Meetings 2018

#### GRECO Plenary

- ▶ GRECO 79 (19-23 March)
- ▶ GRECO 80 (18-22 June)
- ▶ GRECO 81 (3-7 December)

#### GRECO Bureau

- ▶ Bureau 83 (15 February)
- ▶ Bureau 84 (1 June)
- ▶ Bureau 85 (9 November)

#### Conferences

- ▶ Strengthening transparency and accountability to ensure integrity: united against corruption – high-level, international conference organised in the framework of Croatia's Presidency of the Committee of Ministers (Šibenik, 15-16 October)

#### GRECO Statutory Committee

- ▶ 23rd Meeting – Exceptional meeting (13 February)
- ▶ 24th Meeting – Approval Budget 2019 (31 October)

### Evaluation reports adopted in 2018

#### 5th Evaluation Round

- ▶ Estonia
- ▶ Finland
- ▶ Iceland
- ▶ Latvia
- ▶ Luxembourg
- ▶ Netherlands
- ▶ Poland



## Other

- ▶ Ad hoc (Rule 34) report on Poland
- ▶ Ad hoc (Rule 34) Addendum to the 4th Round Evaluation Report on Poland
- ▶ Ad hoc (Rule 34) report on Romania

## Compliance reports adopted in 2018

### 4th Evaluation Round compliance procedure

- ▶ Albania, Bosnia and Herzegovina, Croatia, Cyprus, Italy, Republic of Moldova, Netherlands, Poland – procedures on-going
- ▶ Slovenia – procedures closed

### *Globally unsatisfactory: non-compliance procedure*<sup>21</sup>

- ▶ Austria, Czech Republic, Denmark, France, North Macedonia – procedures opened
- ▶ Belgium, Hungary, Ireland – procedures maintained

### 3rd Evaluation Round compliance procedure

- ▶ Bosnia and Herzegovina, Italy, Liechtenstein, Russian Federation, San Marino – procedures on-going
- ▶ Belgium, Cyprus, Czech Republic, Georgia, Sweden – procedures closed

### *Globally unsatisfactory: non-compliance procedure*

- ▶ Switzerland – procedure maintained
- ▶ Denmark – procedure closed

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21. Rule 32 of GRECO's Rules of Procedure.

## Appendix 4 – GRECO Delegations (at 23/12/2018)

### ALBANIA / ALBANIE

---

Ms Teuta VODO (Head of Delegation)  
Ministry of Justice

Mr Mirjon BRAHIMLLARI  
Anti-Corruption Directorate

### ANDORRA / ANDORRE

---

M<sup>me</sup> Patricia QUILLACQ (Chef de délégation)  
Ministère des Affaires Sociales, de  
la Justice et de l'Intérieur

M<sup>me</sup> Cristina NOBRE MADUREIRA  
Ministère de la Justice et de l'Intérieur

### ARMENIA / ARMENIE

---

Mr Suren KRMOYAN (Head of Delegation)  
Ministry of Justice

Ms Anna KARAPETYAN  
Office of the First Deputy Prime Minister

*Substitut/e*  
Ms Mariam GALSTYAN  
Ministry of Justice

*Substitut/e*  
Ms Anna MARGARYAN  
Faculty of Law

### AUSTRIA / AUTRICHE

---

Mr Christian MANQUET (Head of delegation)  
Ministry for Constitution, Deregulation,  
Reforms & Justice

Ms Caroline BACHER  
Ministry for Constitution, Deregulation, Reforms & Justice

*Substitut/e*  
Ms Verena WESSELY  
Ministry of the Interior

*Substitut/e*  
Ms Evelyn DOJNIK  
Ministry of the Interior

### AZERBAIJAN / AZERBAIDJAN

---

Mr Kamal JAFAROV (Head of delegation)  
Anti-Corruption Commission

Mr Kamran ALIYEV  
General Prosecutor's Office

*Substitut/e*  
Mr Elshan BAYRAM  
Administration of the President

*Substitut/e*  
Mr Elnur MUSAYEV  
Prosecutor's Office

### BELARUS

---

Mr Uladzimir KHOMICH (Head of delegation)  
General Prosecutor's Office

Mr Pavel SASCHEKO  
General Prosecutor's Office

*Substitut/e*  
Ms Hanna KARABELNIKAVA  
General Prosecutor's Office

*Substitut/e*  
Mr Igor SEVRUK  
General Prosecutor's Office

### BELGIUM / BELGIQUE

---

M. Ricardo PARRONDO RAMOS (Chef de délégation)  
Service Public Fédéral Justice

M. Marc VAN DER HULST  
Parlement Fédéral

*Substitut/e*  
M. Carl PIRON  
Service Public Fédéral Justice

*Substitut/e*  
M<sup>me</sup> Ria MORTIER  
Conseil supérieur de la Justice

## BOSNIA AND HERZEGOVINA / BOSNIE-HERZEGOVINE

---

Mr Adnan DLAKIĆ (Head of delegation)  
Ministry of Security

Mr Nenad EŠPEK  
Ministry of Security

## BULGARIA / BULGARIE

---

Mr Georgi RUPCHEV (Head of delegation)  
Ministry of Justice

Mr Petar PETKOV  
Supreme Prosecutor's Office

*Substitut/e*  
Mr Florian FLOROV  
Ministry of Justice

## CROATIA / CROATIE

---

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

Mr Dražen JELENIĆ (Head of delegation)  
State Attorney General

*Substitut/e*  
Mr Davor DUBRAVICA  
Regional Anti-Corruption Initiative

*Substitut/e*  
Mr Kršimir SIKAVICA  
Ministry of the Interior

## CYPRUS / CHYPRE

---

Ms Alexia KALISPERA (Head of delegation)  
Office of the Attorney General

Ms Rena PAPAETI-HADJICOSTA  
Office of the Attorney General

*Substitut/e*  
Ms Natia KARAYIANNI  
Parliament

*Substitut/e*  
Ms Theodora PIPERI  
Office of the Attorney General

## CZECH REPUBLIC / REPUBLIQUE TCHEQUE

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

Ms Lenka HABRNÁLOVÁ  
Ministry of Justice

*Substitut/e*  
Ms Markéta BRABCOVÁ  
Ministry of Justice

## DENMARK / DANEMARK

---

Mr Anders LINNET (Head of delegation)  
State Prosecutor for Serious Economic  
and International Crime

Mr Martin STASSEN  
State Prosecutor for Serious Economic  
and International Crime

*Substitut/e*  
Mr Martin von BÜLOW  
Office of the Director of Public Prosecutions

*Substitut/e*  
Ms Alessandra GIRALDI  
Office of the Director of Public Prosecutions

## ESTONIA / ESTONIE

---

Ms Mari-Liis SÖÖT (Head of delegation)  
Ministry of Justice

Ms Kätlin-Chris KRUUSMAA  
Ministry of Justice

*Substitut/e*  
Mr Tanel KALMET  
Ministry of Justice

## FINLAND / FINLANDE

---

Mr Aarne KINNUNEN (a.i Head of delegation)  
Ministry of Justice

Mr Jouko HUHTAMÄKI  
Ministry of the Interior

*Substitut/e*  
Mr Juuso OILINKI  
Ministry of Justice

## FRANCE

---

M. Michel GAUTHIER  
Avocat Général près la Cour de cassation de Paris honoraire  
**Président d'Honneur du GRECO / Honorary President of GRECO**

M<sup>me</sup> Agnès MAITREPIERRE (Chef de délégation)  
**Vice-President of GRECO / Vice-présidente du GRECO**  
Ministère de l'Europe et des Affaires étrangères

M. Renaud JAUNE  
Agence française anticorruption (AFA)

*Substitut/e*  
M<sup>me</sup> Noémie DAVODY  
Ministère de la justice

*Substitut/e*  
M. Emmanuel FARHAT  
Agence française anticorruption (AFA)

## GEORGIA / GEORGIE

---

Mr Zurab SANIKIDZE (Head of delegation)  
Ministry of Justice

*Substitut/e*  
Ms Mariam MAISURADZE  
Ministry of Justice

*Substitut/e*  
Ms Gulisa KAKHNIASHVILI  
Ministry of Justice

## GERMANY / ALLEMAGNE

---

Mr Markus BUSCH (Head of delegation)  
Ministry of Justice and Consumer Protection

Ms Silvia SPÄTH  
Ministry of the Interior

*Substitut/e*  
Ms Stephanie GOEBEL  
Ministry of the Interior

*Substitut/e*  
Mr Stefan SINNER  
Parliament

## GREECE / GRECE

---

Ms Maria GAVOUNELI (Head of delegation)  
Faculty of Law

*Substitut/e*  
Ms Panagiota VATIKALOU  
First Instance Court of Athens

*Substitut/e*  
Mr Dimosthenis STINGAS  
Court of Appeal in Athens

## HUNGARY / HONGRIE

---

Mr Bálint VARRÓ (acting Head of delegation)  
Ministry of the Interior

Ms Magdolna CSABA  
Ministry of the Interior

## ICELAND / ISLANDE

---

Mr Björn THORVALDSSON (Head of delegation)  
Special Prosecutors Office

Mr Helgi Magnús GUNNARSSON  
Office of the Director of Public Prosecution

*Substitut/e*  
Mr Pall THORHALLSSON  
Prime Minister's Office

## IRELAND / IRLANDE

---

Mr John GARRY (Head of delegation)  
Department of Justice and Equality

Mr Steven FADIAN  
Department of Public Expenditure and Reform

*Substitut/e*  
Ms Joyce NOLAN  
Department of Public Expenditure and Reform

*Substitut/e*  
Mr Conor NELSON  
Permanent Representation of Ireland to the Council  
of Europe

## ITALY / ITALIE

---

M. Raffaele PICCIRILLO (Chef de délégation)  
Cour de Cassation

M. Raffaele CANTONE  
Autorité Nationale Anti-Corruption (ANAC)

*Substitut/e*  
Ms Emma RIZZATO  
Ministry of Justice

*Substitut/e*  
Ms Nicoleta PARISI  
Anti-Corruption National Authority (ANAC)

## LATVIA / LETTONIE

---

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

Ms Sandra KAIRE  
Corruption Prevention and Combating Bureau (KNAB)

*Substitut/e*  
Ms Anna ALOSINA  
Corruption Prevention and Combating Bureau (KNAB)

## LIECHTENSTEIN

---

Ms Elena KLIEN (Chef de délégation)  
Office for Foreign Affairs

Mr Harald OBERDORFER  
Ministry of Justice

*Substitut/e*  
Mr Claudio NARDI  
Office for Foreign Affairs

*Substitut/e*  
Mr Michael JEHLE  
Tribunal de district

## LITHUANIA / LITUANIE

---

NN (Head of delegation)

Ms Agne VERSELYTE  
Ministry of Justice

*Substitut/e*  
Ms Živilė ŠADIANEC  
Special Investigation Service

## LUXEMBOURG

---

M. David LENTZ (Chef de délégation)  
Parquet de Luxembourg

*Substitut/e*

M. Jean BOUR  
Parquet du Tribunal d'Arrondissement de Diekirch

M. Laurent THYES  
Ministère de la Justice

*Substitut/e*

M<sup>me</sup> Cindy COUTINHO  
Ministère de la Justice

## MALTA / MALTE

---

Mr Kevin VALLETTA (Head of delegation)  
Office of the Attorney General

*Substitut/e*

Mr Peter GRECH  
Office of the Attorney General

Ms Nadia CAMILLERI  
Office of the Attorney General

*Substitut/e*

Ms Victoria BUTTIGIEG  
Office of the Attorney General

## REPUBLIC OF MOLDOVA / REPUBLIQUE DE MOLDOVA

---

Mr Alexandru CLADCO (Head of delegation)  
General Prosecutor's Office

*Substitut/e*

M<sup>me</sup> Cornelia VICLEANSCHI  
Bureau du Procureur Général

Mr Valeriu CUPCEA  
National Anti-corruption Centre

## MONACO

---

M. Jean-Laurent RAVERA (Chef de délégation)  
Direction des Affaires Juridiques

*Substitut/e*

M. Jean-Marc GUALANDI  
Service d'Information et de Contrôle  
sur les Circuits Financiers  
Département des Finances et de l'Economie

M. Eric SENNA  
Cour d'Appel

*Substitut/e*

M. Maxime MAILLET  
Direction des Services Judiciaires

## MONTENEGRO

---

Mr Dušan DRAKIC (Head of Delegation)  
Agency for Prevention of Corruption

*Substitut/e*

Ms Ivana MASANOVIC  
Ministry of Justice

Ms Marina MICUNOVIC  
Agency for Prevention of Corruption

*Substitut/e*

Mr Mladen TOMOVIC  
Agency for Prevention of Corruption

## NETHERLANDS / PAYS-BAS

---

Ms Marja van der WERF (Head of delegation)  
Ministry of the Interior and Kingdom Relations

*Substitut/e*

Ms Jorien VLAANDEREN  
Ministry of the Interior and Kingdom Relations

Ms Nina FORTUIN  
Ministry of Security and Justice

*Substitut/e*

Ms Kirsten BOSCH  
Ministry of Security and Justice

## NORTH MACEDONIA / MACEDOINE DU NORD

---

Ms Ana PAVLOVSKA DANEVA (Head of delegation)  
Faculty of Law

Ms Elena SAZDOV  
Ministry of Justice

## NORWAY / NORVEGE

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Ms Mona RANSEDOKKEN (Head of delegation)  
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*Substitut/e*

Ms Kjersti LEHMANN  
Ministry of Justice and Public Security

Mr Jens-Oscar NERGARD  
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*Substitut/e*

Mr Eivind SMITH  
Faculty of Law

## POLAND / POLOGNE

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Mr Rafał KIERZYŃKA (Head of delegation)  
Ministry of Justice

Ms Alicja KLAMCZYŃSKA  
Ministry of Justice

## PORTUGAL

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Mr António FOLGADO (Head of delegation)  
Ministry of Justice

Mr Daniel MARINHO PIRES  
Ministry of Justice

## ROMANIA / ROUMANIE

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Mr Sorin TANASE (Head of delegation)  
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Ms Anca JURMA  
Prosecutors' Office attached to the High Court of  
Cassation and Justice

*Substitut/e*

Ms Oana SCHMIDT HAINOLEA  
Ministry of Justice

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Mr Nicolae SOLOMON  
Superior Council of Magistracy

## RUSSIAN FEDERATION / FEDERATION DE RUSSIE

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Mr Aleksandr BUKSMAN (Head of delegation)  
Prosecutor General's Office

Mr Aslan YUSUFOV  
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Prosecutor General's Office

*Substitut/e*

Mr Andrei ILIN  
Administration of the President

## SAN MARINO / SAINT-MARIN

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M. Eros GASPERONI (Chef de délégation)  
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Mr Manuel CANTI  
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## SERBIA / SERBIE

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Anti-Corruption Agency

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Ms Katarina NIKOLIC  
Ministry of Justice

*Substitut/e*

Mr Jovan COSIC  
Ministry of Justice

## SLOVAK REPUBLIC / REPUBLIQUE SLOVAQUE

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Ms Alexandra KAPISOVSKA (Head of delegation)  
Ministry of Justice

Mr Jan KRALIK  
Ministry of Justice

*Substitut/e*  
Mr Martin GAJDOS  
Ministry of Interior

## SLOVENIA / SLOVENIE

---

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

## SPAIN / ESPAGNE

---

Ms Ana ANDRES BALLESTEROS (Head of delegation)  
Ministry of Justice

Mr Rafael VAILLO RAMOS  
Ministry of Justice

*Substitut/e*  
Mr Rafael BLAZQUEZ  
Ministry of Justice

## SWEDEN / SUEDE

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Ms Monika OLSSON (Head of delegation)  
Ministry of Justice

Mr Mikael TOLLERZ  
Ministry of Justice

## SWITZERLAND / SUISSE

---

M. Ernst GNAEGI (Chef de délégation)  
**Bureau Member / Membre du Bureau**  
Office fédéral de la Justice

M. Olivier GONIN  
Office fédéral de la justice

*Substitut/e*  
M. Jacques RAYROUD  
Ministère public de la Confédération

*Substitut/e*  
M. Jean-Christophe GEISER  
Office fédéral de la justice

## TURKEY / TURQUIE

---

Mr Abdullah MURAT  
Ministry of Justice

Mr Güray GÜÇLÜ  
Ministry of Justice

*Substitut/e*  
Mr İsak TUNCAY  
Ministry of Justice

## UKRAINE

---

Mr Mykhaylo BUROMENSKIY (Head of Delegation)  
National Council for Anti-corruption Policy

Mr Oleksandr PYSARENKO  
National Agency for Corruption Prevention

*Substitut/e*  
Mr Yevhen PIKALOV  
Prosecutor General's Office

*Substitut/e*  
Mr Oleksiy SVIATUN  
Administration of the President



## UNITED KINGDOM / ROYAUME-UNI

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Mr David MEYER (Head of delegation)  
**Bureau Member / Membre du Bureau**  
Ministry of Justice

Ms Fariha KHAN  
Ministry of Justice

*Substitut/e*

Ms Shakira BIRTWHISTLE  
Ministry of Justice

## UNITED STATES OF AMERICA / ETATS-UNIS D'AMERIQUE

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Ms Michelle MORALES  
U.S. Department of Justice

Mr Kenneth HARRIS  
U.S. Department of Justice

*Substitut/e*

Mr Jonathan WROBLEWSKI  
U.S. Department of Justice

*Substitut/e*

Ms Yelena ZERU  
U.S. Department of State

## PRESIDENT OF THE STATUTORY COMMITTEE OF GRECO / PRÉSIDENT DU COMITÉ STATUTAIRE DU GRECO

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Mr Miroslav PAPA  
Ambassador Extraordinary and Plenipotentiary | Permanent Representative  
Permanent Representation of Croatia to the Council of Europe

## PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE / ASSEMBLEE PARLEMENTAIRE DU CONSEIL DE L'EUROPE

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Mr Georgii LOGVYNSKYI (Ukraine)  
Group of the European People's Party

Ms Olena SOTNYK (Ukraine)  
Group of the Alliance of Liberals and Democrats for Europe

## REPRESENTATIVES OF THE CDCJ / REPRÉSENTANTS DU CDCJ

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No nomination

Pas de nomination

## REPRESENTATIVE OF THE CDPC / REPRÉSENTANT DU CDPC

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Ms Helena KLIMA-LIŠUCHOVÁ  
Ministry of Justice

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

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Ms Katherine DELIKOURA

## OBSERVERS / OBSERVATEURS

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

M. Patrick MOULETTE  
Ms France CHAIN

Ms Olga SAVRAN  
Ms Tanya KHAVANSKA

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

Ms Brigitte STROBEL-SHAW

Mr Dimitri VLASSIS

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

Mr Martin KREUTNER  
Ms Christiane POHN-HUFNAGL

Mr Jaroslaw PIETRUSIEWICZ  
Ms Simona MARIN

**ORGANISATION OF AMERICAN STATES (OAS) / ORGANISATION DES ETATS AMERICAINS (OEA)**

Mr Jorge GARCIA-GONZALES

**INTERNATIONAL INSTITUTE FOR DEMOCRACY AND ELECTORAL ASSISTANCE / INSTITUT INTERNATIONAL POUR LA DEMOCRATIE ET L'ASSISTANCE ELECTORALE (International IDEA)**

Mr Sam VAN DER STAAK

**OFFICE FOR DEMOCRATIC INSTITUTIONS AND HUMAN RIGHTS OF THE ORGANISATION FOR SECURITY AND COOPERATION IN EUROPE (OSCE/ODIHR) / BUREAU DES INSTITUTIONS DÉMOCRATIQUES ET DES DROITS DE L'HOMME DE L'ORGANISATION POUR LA SÉCURITÉ ET LA COOPÉRATION EN EUROPE (OSCE/BIDDH)**

## Appendix 5 – Working Together for Greater Impact

### European Union (EU)

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- ▶ Meeting with representatives from the European Commission, DG Justice, International dimension of European Justice Policies, Interinstitutional and international relations (Strasbourg, 1 March) – Secretariat
- ▶ European Anti-Fraud Office (OLAF) / Transparency International Hungary (EU Programme Hercule III) Conference on conflict of interest as a fraud risk (Budapest, 19 April) – Secretariat
- ▶ European Commission (DG Home) Experience sharing workshop – Challenges in prosecuting high-level corruption and bilateral meeting with Olivier ONIDI, Deputy Director General, DG Migration and Home Affairs (Paris, 25 June) – Secretariat
- ▶ European Union Agency for Fundamental Rights (FRA) – Forum (Vienna, 25-27 September) – GRECO President
- ▶ Bilateral meeting with Wolfgang PEKEL, Ministry of Justice of Austria, Chair of the Article 36 Committee (CATS) (Vienna, 26 September) – Secretariat
- ▶ Article 36 Committee (CATS) meeting (Strasbourg, 30 November) – Secretariat
- ▶ Various bilateral consultations at the request of EU institutions – Secretariat

### International Institute for Democracy and Electoral Assistance (International IDEA)

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- ▶ Bilateral meeting with Yves LETERME, Secretary General of International IDEA (Strasbourg, 19 November) – Secretariat

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

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- ▶ Meetings of the Working group on bribery in international business transactions – WGB (Paris, 14 March; 14 June; 8-9 October; 11 December) – Secretariat
- ▶ 3rd Forum on governance of infrastructure: Quality infrastructure in the public interest – Delivery of sustainable, transparent and inclusive infrastructure (Paris, 26 March) – Secretariat
- ▶ Global anti-corruption and integrity forum (Paris, 27-28 March) – GRECO President
- ▶ Network for integrity Workshop on digital tools to promote and monitor public integrity (Paris, 29-30 March) – Secretariat
- ▶ Meetings of the Working party of senior public integrity officials – SPIO (Paris, 26 March and 29-30 November) – Secretariat

### Organisation for Security and Co-operation in Europe/Office for Democratic Institutions and Human Rights (OSCE/ODIHR)

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- ▶ Conference on the role of parliament and government bodies in the fight against corruption in Bosnia and Herzegovina (Sarajevo, 5 June) – GRECO Evaluator Vladimir GEORGIEV (North Macedonia)
- ▶ Judges' Association of Serbia / OSCE Mission to Serbia Conference on international standards and changes of the Serbian constitution regarding the judiciary (Belgrade, 9 June) – GRECO President
- ▶ 3rd Round table on the laws on the judiciary in Poland (Warsaw, 9 July) – Secretariat
- ▶ Italian 2018 Chairmanship of the OSCE Conference on Developing anti-corruption strategies for the digital age, recent trends and best practices in the OSCE area (Rome, 12 November) – Secretariat

### Organization of American States (OAS)

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- ▶ Plenary session of the Mechanism for follow-up on the implementation of the Inter-American Convention against Corruption – MESICIC (Washington, DC, 12-13 September) – Secretariat

### G20 Anti-corruption Working Group

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- ▶ Session 12 of the Anti-corruption working group – ACWG (Paris, 8-9 October) – Secretariat

## United Nations represented by the UN Office on Drugs and Crime (UNODC)

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- ▶ Launch of the UNODC Global judicial integrity network including an Interactive panel discussion on Transparency and how to demystify the work of the courts, by Council of Europe experts (GRECO, Venice Commission and CCJE) (Vienna, 9-10 April) – GRECO Evaluator José Igreja MATOS (Portugal)
- ▶ United Nations Convention against corruption 9th session of the implementation review group (Vienna, 4-6 June) – Secretariat
- ▶ 9th Session of the Open-ended intergovernmental working group on the prevention of corruption (Vienna, 5-7 September) – Secretariat

## Others

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- ▶ University of Basel / Basel Institute on Governance / Swiss Institute of Comparative Law / AC Competence Centre Conference on arbitration and crime – dealing with allegations of economic crime in arbitration (Basel, 11-12 January) – GRECO President
- ▶ Foreign and International Cooperation Ministry of Italy Inter-institutional round table against corruption, (Rome, 1-2 February) – Secretariat
- ▶ Meeting with representatives of the Fédération européenne des écoles – FEDE (Federation for Education in Europe) (Strasbourg, 15 February) – Secretariat
- ▶ Official contacts on the process for Tunisia's accession to GRECO: Instance Nationale de la lutte contre la corruption – INLUCC (national anti-corruption agency); Advisor of the Prime Minister for Governance and Administrative Reform; State Secretary – Ministry of Foreign Affairs; Ambassador – Head of the European Union Delegation to Tunisia; Resident Representative of the IMF in Tunisia; Director for Europe – Ministry of Foreign Affairs; Coordinator of the network of NGOs Alliance civile contre la corruption (civil alliance against corruption) (Tunis, 19-20 February) – Secretariat
- ▶ EUROsociAL+ (cooperation programme between Latin America and the European Union) Expert meeting on international cooperation in the fight against corruption (Madrid, 5 March) – GRECO Evaluator Íñigo ORTIZ DE URBINA (Spain)
- ▶ Training session for students of the Russian Presidential Academy of National Economy and Public Administration (Moscow, 5 March) – Secretariat
- ▶ The Hague Academy for local governance / University of Leiden / Netherlands Helsinki Committee / Ministry of Foreign Affairs of the Netherlands, Matra Rule of Law Training Programme on Integrity of Civil Servants (The Hague, 12 March) – Secretariat
- ▶ Meeting with Carl DOLAN, EU Director of Transparency International (Brussels, 12 March) – Secretariat
- ▶ Teleconference presentation on GRECO to Prague office of Dentons (22 March) – Bureau member Helena KLIMA-LISUCHOVA (Czech Republic)
- ▶ European Public Law Organization, Academy for Transparency and Human Rights Academic conference for students of the Russian Presidential Academy of National Economy and Public Administration (Strasbourg, 26 March) – Secretariat
- ▶ Regional Anti-corruption Initiative (RAI) / Advice on Individual Rights in Europe (AIRE), organised in cooperation with the Government of the United Kingdom, and the OSCE Conference on Strengthening cooperation in the field of asset recovery in South East Europe (Sarajevo, 28 March) – Secretariat
- ▶ Ministry of Justice of Morocco, First edition of the Marrakech Conference on Justice : Independence of the judiciary (Marrakech, 2-4 April) – Secretariat
- ▶ Universities Bocconi and Statale of Milan Academic conference on international legal instruments against corruption – keynote address (Milan, 16 April) – Secretariat
- ▶ Meeting with Arman TATOYAN, Ombudsman of Armenia (Strasbourg, 28 May) – Secretariat
- ▶ Meeting with senior representatives of the State Bureau of Investigations of Ukraine – SBI (Strasbourg, 29 May) – Secretariat
- ▶ Transparency International Germany 25th Anniversary event and meeting of its Working group on political affairs (Berlin, 8-9 June) – Secretariat
- ▶ EUROsociAL+ International seminar on whistleblower protection (Santiago de Chile, 3-4 September) – former GRECO Evaluator, Executive Director of Whistleblowing International Network (WIN) Anna MYERS

- ▶ Bilateral meetings with the US State Department and Department of Justice (Washington, DC, 12-13 September) – Secretariat
- ▶ Coordination meeting with the authorities of France: Ministry for Europe and Foreign Affairs, Ministry of Justice, High Authority for Transparency in Public Life, on the event planned in the framework of the French Presidency of the Committee of Ministers of the Council of Europe in 2019 to mark the 20th anniversary of GRECO (Paris, 14 September) – Secretariat
- ▶ Association of Croatian Judges 4th International conference (Zagreb, 14-15 September) – GRECO President
- ▶ German section of the International Commission of Jurists 63rd Annual conference on realities of and threats to the rule of law (Hamburg, 19 October) – Secretariat
- ▶ European Partners against Corruption (EPAC)/European Contact-Point Network against Corruption (EACN) Annual professional conference and General assembly (Rust, 22 October) – Secretariat
- ▶ Meeting with Karoline EDTSTADLER, State Secretary in the Ministry of the Interior of Austria (Rust, 22 October) – Secretariat
- ▶ Bureau of European and Eurasian Affairs (EUR) of the US State Department Anti-corruption workshop (Prague, 7 November) – Secretariat
- ▶ Federal Office of Justice of Switzerland Workshop on law-making related to the financing of political parties and election and referenda campaigns (Berne, 13 November) – Secretariat
- ▶ 9th edition of the International forum on business ethical conduct for the aerospace and defence industry – IFBEC (Paris, 14 November) – Secretariat
- ▶ ABC Minds International Anti-bribery and corruption conference (London, 21 November) – Secretariat
- ▶ Danish Helsinki Committee for Human Rights Conference on anti-corruption (Copenhagen, 27 November) – Secretariat
- ▶ Agence française Anticorruption – AFA (Anti-corruption agency of France) Conference on national and international corruption: prevention, detection, repression at the Ecole nationale de la magistrature (National academy for the judiciary of France) (Paris, 29 November) – Secretariat
- ▶ Meeting with Lovro KUSCEVIC, Minister of Public Administration of Croatia (Strasbourg, 30 November) – Secretariat
- ▶ Konrad-Adenauer-Stiftung, Rule of Law Programme South East Europe, International conference – Independence of the judiciary under threat? (Strasbourg, 5 December) – GRECO President
- ▶ Network of Corruption Prevention Authorities – Šibenik Network 1st meeting (Strasbourg, 5-6 December)
- ▶ European Law Students Association (ELSA) Webinar (10 December) – Secretariat
- ▶ Anti-Corruption Agency of Serbia, with the support of the OSCE Mission and the Embassy of Italy in Serbia, Conference on implementation of corruption prevention mechanisms and bilateral meetings with the Heads of the Delegation of the European Union and the OSCE Mission to Serbia (Belgrade, 13-December) – GRECO President

## Council of Europe

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- ▶ Meeting between the Secretary General and the Presidents of Council of Europe Monitoring Bodies (Strasbourg, 18 January) – GRECO Vice-President
- ▶ Study visit to the Council of Europe – Judges/Assistant judges from Sweden (Strasbourg, 24 and 30 January) – Secretariat
- ▶ European Court of Human Rights Judicial Seminar 2018 and Solemn Hearing of the Court (Strasbourg, 26 January) – GRECO President
- ▶ Meeting with Anna RURKA, President of the Conference of INGOs of the Council of Europe (Strasbourg, 8 February) – Secretariat
- ▶ Conference on public ethics in Greece, organised in the framework of the European Union / Council of Europe joint Project: Technical assistance on institutional enhancement for local governance in Greece (Athens, 15 March) – Secretariat
- ▶ Parliamentary Assembly / Venice Commission, in cooperation with the Congress of Local and Regional Authorities Seminar for the parliaments of Albania and Bosnia and Herzegovina on the misuse of

administrative resources during electoral processes: a major challenge for democratic elections (Tirana, 10-11 April) – Head of GRECO Delegation Dušan DRAKIC (Montenegro)

- ▶ Alumni of the Council of Europe School of Political Studies in Bosnia and Herzegovina Roundtable on corruption and integrity and their political and economic impact (Sarajevo, 23 April) – GRECO Evaluator Vladimir GEORGIEV (North Macedonia)
- ▶ Parliamentary Assembly Monitoring Committee (Strasbourg, 26 April) – Secretariat
- ▶ Exchange of views and presentation of GRECO's General Activity Report – 2017 to the Committee of Ministers (Strasbourg, 2 May) – GRECO President
- ▶ Press launch of GRECO's General Activity Report – 2017 (Brussels, 3 May) – GRECO President
- ▶ Parliamentary Assembly Committee on Political Affairs and Democracy (Athens, 22 May) – Head of GRECO Delegation Maria Gavouneli and GRECO Representative Panagiota VATIKALOU (Greece); Secretariat
- ▶ Study visit to the Council of Europe – Ecole nationale de la magistrature (National academy for the judiciary of France) (Strasbourg, 25 June) – Secretariat
- ▶ Meetings with PACE delegations – Germany, Greece, Belgium (Strasbourg, 26-27 June) – Secretariat
- ▶ State Audit Office of Georgia / OSCE/ODIHR / International IDEA / International Foundation for Electoral Systems (IFES) / United States Agency for International Development (USAID) / Transparency International Georgia (TI) / Eastern European Centre for Multiparty Democracy (EECMD) Third Regional Conference on Money in Politics, organised by the Electoral Assistance Division, Directorate General II – Democracy of the Council of Europe (Tbilisi, 26-27 June) – GRECO Evaluator Yves-Marie DOUBLET (France)
- ▶ Information seminar for Secretaries of National Delegations in the Parliamentary Assembly (Strasbourg, 29 June) – Secretariat
- ▶ Study visit to the Council of Europe – law students and practicing lawyers from Georgia (Strasbourg, 18 September) – Secretariat
- ▶ Study visit to the Council of Europe – Members of the Administrative High Court for Trade and Industry of the Netherlands (Strasbourg, 9 October) – Secretariat
- ▶ Council of Europe (project – Continued support to the criminal justice reform in Ukraine) in cooperation with USAID and the High Council of Judges of Ukraine Conference on Disciplinary liability of judges and prosecutors in Ukraine (Kiev, 19 October) – Secretariat
- ▶ Chairmanship of Croatia of the Council of Europe, in cooperation with the Parliamentary Assembly, Conference on building democratic security in the Mediterranean: common challenges, shared responsibility (Dubrovnik, 6 November) – GRECO President
- ▶ Exchange of views with the Status Committee of the European Court of Human Rights (Strasbourg, 8 November) – GRECO President
- ▶ Study visit to the Council of Europe – Members of the High Council of Justice of Georgia (Strasbourg, 27 November) – Secretariat
- ▶ Ensuring Justice – European Commission for the Efficiency of Justice (CEPEJ) coordination meeting (Belgrade, 27 November) – Secretariat
- ▶ Gender Equality Commission (Strasbourg, 6 December) – GRECO Gender Equality Rapporteur Vita HABJAN BARBORIČ (Head of Delegation, Bureau member, Slovenia)

## **Appendix 6 – GRECO Secretariat (2018)**

Directorate General Human Rights and Rule of Law,  
Information Society – Action against Crime Directorate

Gianluca ESPOSITO, **Executive secretary**

Elsbeth REILLY, Personal assistant to the Executive secretary

Björn JANSON, **Deputy executive secretary**

### **Senior legal advisors**

Christophe SPECKBACHER

Laura SANZ-LEVIA

Sophie MEUDAL-LEENDERS

Liubov SAMOKHINA

Tania VAN DIJK

Gerald DUNN

Roman CHLAPAK

### **Central office**

Penelope PREBENSEN

Marie-Rose PREVOST

Laure PINCEMAILLE

GRECO's membership spans the whole European continent and includes the United States of America.

### **GRECO members (forty-nine) by date of accession**

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

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

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

The Council of Europe is the continent's leading human rights organisation. It comprises 47 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

