GROUP OF STATES AGAINST CORRUPTION (GRECO)

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

Feature article:

The European Public Prosecutor's Office

Laura KOVESI, Chief European Public Prosecutor

Anti-corruption body of the Council of Europe

20th General Activity Report (2019)

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

COUNCIL OF EUROPE
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20th General Activity Report (2019)

of the Group of States against Corruption (GRECO)

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Adopted by GRECO
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OPENING REMARKS BY THE PRESIDENT

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

As in previous years, this Activity Report provides an account of the "state of corruption" in Europe and the United States in 2019. The Report highlights the main trends drawn from GRECO's evaluations and recommendations. It also presents examples of good practices, and shows the situation as regards the level of implementation of GRECO's recommendations by our member states.

Looking back at 2019, I would like to make six main observations.

First, we expect nothing less than exemplarity from public-office holders. As I mentioned on the occasion of Anti-Corruption Day 2019, in too many countries we are witnessing corruption or unethical behaviour by the very persons who are in charge of our public institutions. This lowers trust in and respect for such institutions which, in turn, erodes democracy, Human Rights and the rule of law. We should not be surprised then if there is an increased distance between the people and their public institutions.

This is intensified by the fact that people's growing expectations with respect to exemplary conduct by public office holders have increasingly been disappointed over recent times. The many mass demonstrations which have taken place in 2019 in Europe and around the world to call for justice and hold public office holders to account are a testament to this. Politicians, irrespective of their political affiliation, need to lead by example as it is exemplarity which is expected from them. After all, politicians are meant to serve, not to rule, the people.

Second, no person, state or institution is immune to corruption. It is also beyond doubt that political will is key to combatting it effectively. Yet, in 2019, GRECO has again proved to be right in the shortcomings it highlighted in a number of jurisdictions. What we predicted, regrettably happened. When we issue our recommendations, we do so because not addressing the shortcomings we identify leaves the system flawed. Our member states should not await the next big scandal to make reforms. Instead, the best course of action is to proactively implement GRECO recommendations fully and timely. This will, in turn, create the necessary conditions for corruption to be prevented before it is too late. Even countries with a high-level of trust in their public institutions need to introduce anti-corruption preventive measures where a possible gap has been identified, no matter where they are placed in perception indexes. Any loophole can be exploited by corruption and loss of trust can prove difficult to regain once a damaging scandal occurs. And for those who think that "trust" is enough, facts in 2019 have proven otherwise.

Third, our new Rule 34 ad hoc evaluation procedure as a rapid-reaction mechanism is working. It has enabled GRECO to intervene where and when it was needed timely and effectively. Despite the rather unprecedented levels of criticism GRECO has received from one or other political side, at the end of the day, countries realised that the reforms we recommended are in their best interest and necessary. Some of these countries have enacted reforms due to the simple fact that GRECO triggered this procedure, without waiting for the final adoption of the report. Slowly, but surely, our Rule 34 procedure has not only enabled us to stop regression, but it has also prompted positive reforms.

Fourth, there is no such thing as "à la carte" evaluations. GRECO's monitoring work is premised on the equal treatment of all our member states, and the fairness and objectivity of our processes. It is in nobody's interest to start tampering with the timeline and our processes. I call on all member states to look beyond their individual country's concerns or short-term political contingencies, and instead to preserve the integrity of the system which has served us well for over 20 years.

In this context, and this is my fifth point, we have collectively made progress. In the 4th Evaluation Round alone (corruption prevention in respect of members of Parliament, judges and prosecutors) which started in 2012, nearly half of our member states carried out Constitutional reforms following GRECO recommendations. For the same round, thanks to GRECO recommendations, over 150 concrete legislative, regulatory or institutional reforms have been undertaken in our member states in Europe and in the USA in a rather short period of time. This number more than doubles if one considers the 3rd Evaluation Round (incrimination and transparency of party funding) which started in 2007 and is almost completed. We are making a difference.

The sixth point I would like to make relates to political financing. This is an area GRECO evaluated under its 3rd Evaluation Round. Since then, and with very few exceptions, most of our member states have put in place a legal and regulatory system that provides for some form of transparency of political financing. That said, new challenges are arising. These include the (mis)use of new technologies to escape transparency requirements or to provide political support through fake political advertising online and unregulated foreign funding.[1] These are new challenges that have arisen in recent years and we are closely watching developments in this area.

In 2019, despite the budgetary uncertainty, GRECO adopted the target of evaluation, ad hoc and 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 more countries, bringing the total number of Rule 34 procedures to four. We have not hesitated to move to the next level of the non-compliance procedure (a high-level visit and a public declaration of non-compliance) in cases of persistent lack of implementation of GRECO's recommendations.

Regarding the resources available to us, as a highly cost-effective mechanism we reached our limit in 2019. I am grateful to the Statutory Committee for its support to GRECO's work which allows us to maintain our pace, though not to do more. There is no effective fight against corruption without adequate resources which, in turn, demonstrate the political will to tackle corruption. Equally, GRECO will not be restrained in its evaluation work by a fear of budget shortfalls. The substance of our monitoring work will never be influenced by budget considerations or the positions individual member states may have on such matters.

GRECO recognises the need to support countries in implementing its recommendations. With this in mind, I am glad that GRECO agreed to develop its advisory function. In response to requests by one or more member states or by a Council of Europe body, GRECO is now able to discuss and adopt expertise reports compiling lessons learned and good practices focusing on particular areas or topics covered by a prior GRECO evaluation. This work could be very beneficial, as a source of inspiration for all member states when carrying out domestic reforms and implementing outstanding GRECO recommendations. Depending on budgetary availabilities, GRECO could adopt one or two such expertise reports every year. I would like to thank the former French Presidency of the Committee of Ministers (May – November 2019) for having led and supported this initiative on the occasion of the event celebrating GRECO's 20th anniversary in June 2019.

Let me thank the successive Secretaries General for their unwavering support for GRECO's work. Whether it is in the context of the Secretary General's annual Report on the state of Democracy, Human Rights and the Rule of Law in Europe or in the course of their high-level bilateral visits, I am grateful for their efforts to support the implementation of our recommendations at the highest level. I trust this support will continue in the years ahead.

1. Article 7 (Donations from foreign donors) of Recommendation Rec(2003)4 of the Committee of Ministers to member states on common rules against corruption in the funding of political parties and electoral campaigns provides that "States should specifically limit, prohibit or otherwise regulate donations from foreign donors".

Externally, two major developments occurred in 2019. First, after nearly 20 years of discussions, the EU became an observer in GRECO. This has to be seen as a first step towards full membership. It will be hard for the people of Europe to understand why everyone is subject to GRECO's evaluations, except the EU institutions. Second, Kazakhstan became GRECO's 50th member state. This is an important development which opens GRECO's door towards Central Asia and confirms its global nature.

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 the Organization of American 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 and the OECD Working Group on Bribery in International Business Transactions carried out their first joint evaluation visit in Greece in October 2019. GRECO also intends to continue working closely with other partners such as the G20 and the G7, and I call on their successive chairmanships to support continued cooperation with GRECO.

Mainstreaming gender in all policies and measures is one of the objectives of the Council of Europe Gender Equality Strategy. For GRECO, this goal remains at the heart of its monitoring tasks and its working methods. Gender diversity is a key mechanism in the prevention of groupthink and, in turn, of corruption. 22 questions, about a third of those in our 5th round evaluation questionnaire are gender-related, and these generated a number of country-specific, gender-related recommendations, to several countries in our 5th round evaluation reports adopted thus far on preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies.

Last but not least, corruption prevention starts in schools. This is why we have developed with the "Federation for EDucation in Europe" (FEDE), an INGO with participatory status with the Council of Europe, a pioneering education module on anti-corruption. The education module will be part of FEDE's course on European Culture and Citizenship and will be taught across FEDE's network of schools to over 10 000 students annually. It will familiarise students with different forms of corruption, its causes and consequences, measures taken to fight corruption and international standards.

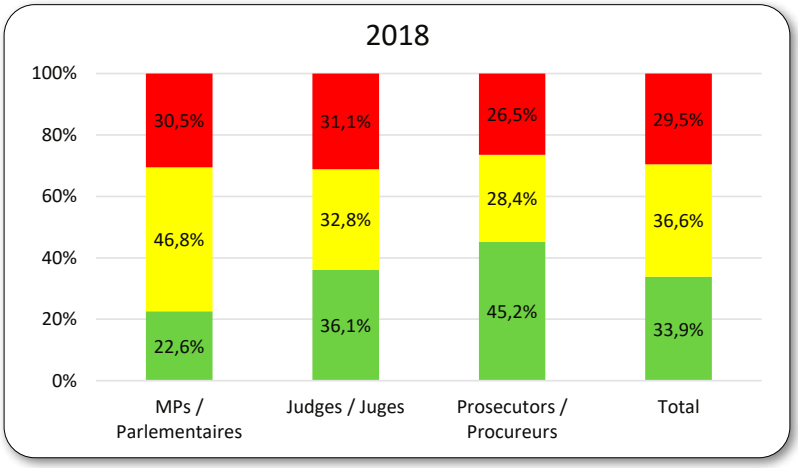
KEY FINDINGS

GRECO's core evaluation work remained sustained in 2019, in spite of budgetary uncertainties. The target of evaluation, compliance and ad hoc reports has been achieved. In addition, GRECO adopted its first Public Statement (Rule 32). Budgetary uncertainties directly impacted GRECO. Prudent budget management, efficiency savings and additional voluntary financial contributions by member states (Albania, Armenia, Austria, Bulgaria, Croatia, the Czech Republic, Estonia, Finland, Georgia, Germany, Ireland, Italy, Latvia, Liechtenstein, Luxembourg, Monaco, Montenegro, the Netherlands, Norway, Poland, Romania, the Russian Federation, San Marino, Serbia, the Slovak Republic, Sweden, Switzerland, Ukraine and the United States) filled part of the gap and enabled GRECO to carry out most (but not all) of its original work programme which is designed according to procedural deadlines in its Rules of Procedure.

4th Round – Compliance

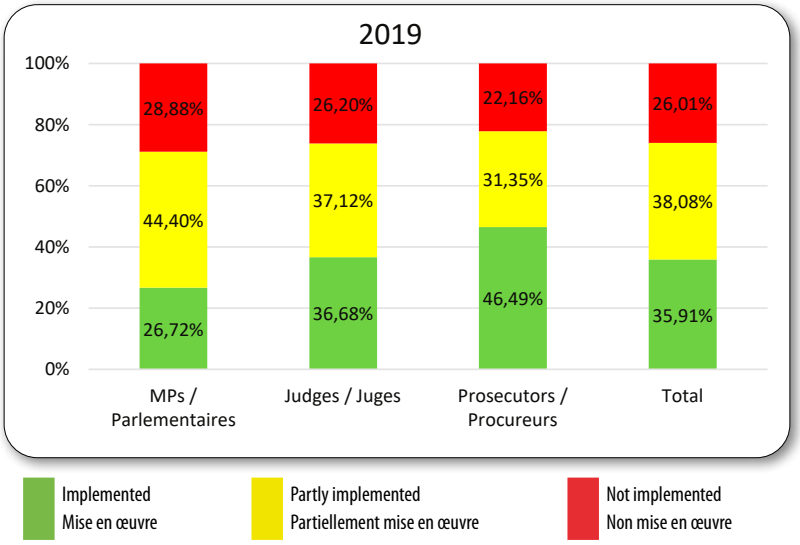
The compliance process in the 4th Evaluation Round was in full swing in 2019 (see Figure 1). Through the adoption of its 4th Round compliance reports, GRECO continued to push for the implementation of a solid body of recommendations to strengthen the prevention of corruption in respect of members of parliament, judges and prosecutors.[2] The key findings and conclusions of the 4th Evaluation Round were summarised in a Study entitled "Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors" (2017).[3]

Figure 1 – Implementation of 4th Round recommendations by GRECO member states 2018/2019
All assessments made public by end 2018 – 35 member states



2. At end 2019, a number of countries were in the non-compliance procedure under the 4th round. These are: Armenia, Austria, Czech Republic, Denmark, France, Germany, Hungary, Ireland, Luxembourg, Monaco, North Macedonia, Poland, Portugal, Romania and Turkey. Belarus is the only country in the non-compliance procedure under the Joint 1st and 2nd rounds and the 3rd round.
3. See Study "Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors" (2017): http://rm.coe.int/rma/drl/objectId/09000016807638e7.

All assessments made public by end 2019 – 42 member states



5th Round – Evaluation

On 17 June 2019, under the aegis of the French Presidency of the Committee of Ministers of the Council of Europe, an event to mark GRECO's 20th anniversary was organised.[4] This event was, among others, an occasion to take stock of the key findings of GRECO's 5th round evaluations, as it gradually reaches its mid-point level.[5] These can be briefly summarised as follows.

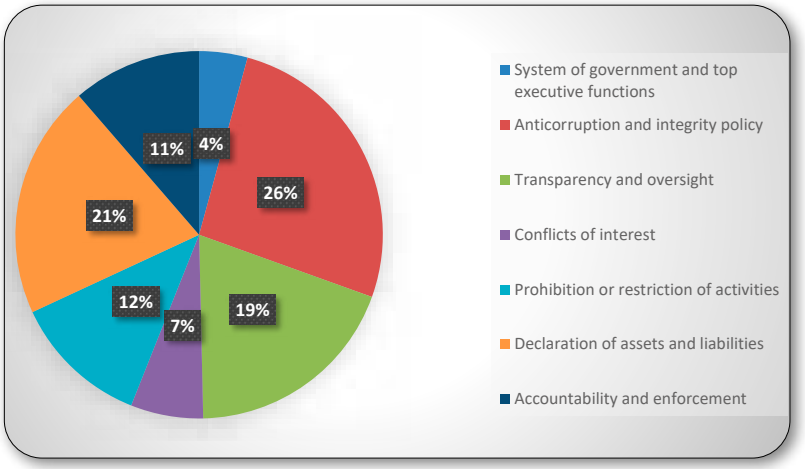
GRECO's 5th Evaluation Round deals with two categories: central governments, including persons with top executive functions (PTEFs), and law enforcement. The two groups selected by GRECO are different in scope and powers, yet their ability to maintain and demonstrate integrity as well as their capacity to cope with their internal corruption-related risks are vital for the proper functioning of democracies based on the fundamental values of the Rule of Law and the protection of Human Rights.

Setting the proper tone with regard to anti-corruption should start with top executives who should lead by example and with integrity. Irrespective of differences in the form of government and traditions, GRECO focused on the following major topics (categories) (see Figure 2):

- 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

4. For more information, visit the Conference webpage: https://www.coe.int/en/web/greco/20th-anniversary-of-greco
5. For a more comprehensive overview, see Mid-term evaluation of results and trends of GRECO's 5th Evaluation Round by Elena Koncevičiūtė: https://rm.coe.int/corruption-prevention-central-governments-top-executive-functions-and-/168094cb7d.

Figure 2 – Central government (including persons with top executive functions) – distribution of recommendations issued per topic



Anticorruption and integrity policy, regulatory and institutional framework

This topic has attracted the highest number of recommendations so far. Although many countries have some integrity policies in place, most of them needed to include PTEFs specifically. GRECO recommended to analyse and mitigate the risks this group of officials are exposed to and build monitoring and compliance measures to help them achieve and *be seen to* achieve better progress in preventing corruption and instilling integrity. Most of the countries reviewed so far were asked to review the codes of conduct for PTEFs. Many of them were recommended to adopt or consolidate in a single document policies or standards, providing clear guidance on conflicts of interest and other integrity related matters, coupled with an effective supervision mechanism (in some cases sanctions).

In some of the countries evaluated, the scope of PTEFs subject to the provisions of the code of conduct had to be broadened to include, for instance, political advisers or senior civil servants appointed to political positions. Much emphasis was put on the enforcement of such codes, coupled with confidential counselling and regular and compulsory training. Many of the general issues mentioned under this topic (e.g. on lobbying, gifts and conflicts of interest) were moulded into more detailed recommendations under the other themes, hence reinforcing the need for a more holistic approach in this area.

Transparency and oversight of executive activities of central government

Access to information and transparency of the law-making process are still areas that required GRECO's intervention, despite the numerous recommendations that countries received in the past. GRECO had to recall the overall principle of transparency of public documents and that it should be guaranteed in practice. GRECO reiterated that any exceptions to the rule of public disclosure should be limited to a minimum and that outcomes of public participation procedures should be public information. Public scrutiny is key also with respect to public procurement, in particular concerning large public contracts, and therefore should not be under-estimated.

Against this background, GRECO issued recommendations to many countries relating to the absence of rules or guidance on how PTEFs should engage with lobbyists or third parties seeking to influence the public decision-making process. It recommended to many countries to ensure transparency in this area, asking them to require disclosure of such contacts and the subject matters discussed, providing enough details. The European standard in this area is the Committee of Ministers Recommendation on the legal regulation of lobbying activities in the context of public decision making (2017).[6]

6. https://rm.coe.int/legal-regulation-of-lobbyingactivities/168073ed69

Conflicts of interest

In a majority of the countries evaluated thus far, GRECO recommended to improve the management of conflicts of interest, clearly defining the rules and procedures of management of conflicts of interest, including those arising on an ad hoc basis. Much emphasis was placed on advisory, monitoring and compliance mechanisms.

Prohibition or restriction of certain activities

Incompatibilities, gifts, misuse of confidential information and restriction of post-employment activities were thoroughly assessed by GRECO. With regard to secondary activities, many countries were asked to review their existing rules and spell out in greater detail the activities that can be exercised by PTEFs and those which should be excluded. In relation to gifts and other benefits, GRECO reiterated the importance of strict limitations, highlighting the danger of exchange of "favours" in situations where there is excessive "cosiness" between politicians and the business community. Many of the countries reviewed were also recommended to improve the situation with regard to the mobility of PTEFs from the public to the private sector (so-called "revolving-doors").

Declaration of assets, income, liabilities and interests

Despite multiple attempts to introduce financial disclosure obligations as a tool of transparency, a number of deficiencies remain with regard to the scope of persons covered by this requirement, the timely publication of declarations and most importantly, with regard to their depth and independent and systematic monitoring. Some countries were recommended to require political advisers associated with a minister's decision-making to fill in declarations of assets, income, liabilities and interests, while others were recommended to define more specifically which interests were to be declared. Almost all of the countries reviewed were recommended to consider widening the scope of declarations of interests to include information on spouses and dependent family members.

Accountability and enforcement mechanisms

PTEFs should lead by example in matters of integrity. With that in mind, GRECO issued a series of recommendations relating to accountability and enforcement of anti-corruption measures. Under this topic, GRECO issued a number of recommendations to strengthen public integrity bodies and equip law enforcement with the proper means to conduct inquiries and investigations. GRECO stressed that codes of conduct for PTEFs would benefit from a robust mechanism of supervision and enforcement. It also pointed out that the outcomes of procedures undertaken in respect of persons entrusted with top executive functions should be made known to the public. In some instances, GRECO encouraged law enforcement to be more proactive in dealing with suspicions of offences committed by PTEFs and start investigations on the basis of reasonable suspicion rather than of having irrefutable evidence. In a couple of instances, GRECO reiterated its recommendations given during the 1st Evaluation Round with regard to making it possible for law enforcement, subject to judicial authorisation, to use special investigative techniques.

More than fifteen years after the subject of immunities was dealt with in GRECO's 1st Evaluation Round, GRECO still issued recommendations to some countries about the standard laid down in the Twenty Guiding Principles for the Fight against Corruption[7] stipulating that *immunities should be limited to the extent necessary in a democratic society so as not to hamper the investigation, prosecution or adjudication of corruption offences*. It goes without saying that this rule also applies to criminal investigations against PTEFs. GRECO recommended to limit the privileges with respect to prosecution enjoyed by PTEFs for acts performed outside their official capacity and stressed the importance of objective and fair criteria for lifting immunities.

Law enforcement agencies have the authority and powers to tackle crime

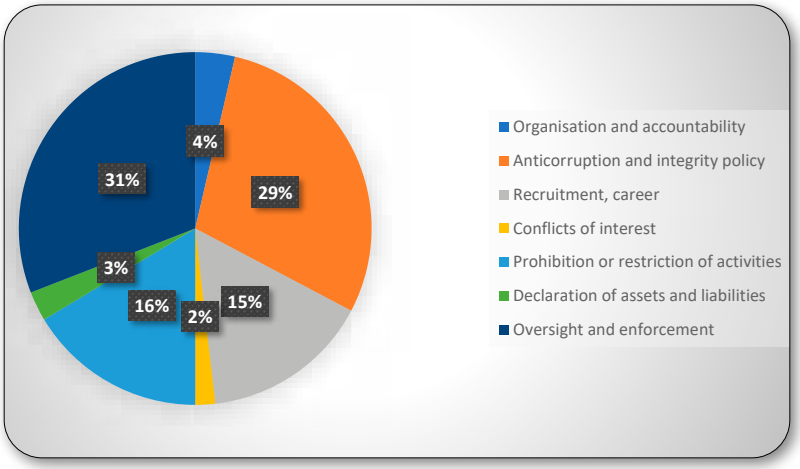
Although bound by the hierarchical structure, they should ensure that their investigations are independent and free from any undue political or other pressure. Given the authority to enforce the law, they should be constantly aware that they are subject to the highest standards of integrity.

7. Resolution (97)24 of the Committee of Ministers, On the Twenty Guiding Principles for the Fight Against Corruption, 6 November 1997, https://rm.coe.int/16806cc17c.

In respect of law enforcement, GRECO focused on the following issues (see Figure 3):

- 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

Figure 3 – Law enforcement – distribution of recommendations issued per topic



Anti-corruption and integrity policy

Although a number of the countries evaluated had well-developed national anti-corruption strategies, codes of conduct and overall policy guidelines, the majority were asked to complement their codes of conduct with provisions on gifts, ad hoc conflict of interests and relations with third parties. GRECO also stressed that such codes should be followed by supervision and enforcement, in some cases asking them to introduce sanctions.

No enforcement of a code of conduct is possible without it being well understood and internalised. With that in mind, GRECO recommended to almost all the countries assessed to have regular training on corruption prevention, integrity and conflicts of interests, conducted by qualified trainers, for all police staff, particularly including their superiors. GRECO also pointed out that all preventive tools should be explained to the public, so that it is aware of the integrity standards that the police is subject to, thus gaining trust and support.

Organisation and accountability

To be able to perform effectively, adequate resources for law enforcement are necessary. In some instances, GRECO had to stress to the authorities that they need to ensure appropriate and dignified pay for their police officers. GRECO was also concerned in some instances that the necessary resources and expertise were not always allocated to allow for effective reforms of the police and their internal control structures.

Recruitment, career and conditions of service

GRECO recommended that, from the very beginning and throughout their career, the management of law enforcement personnel should be driven by the principles of transparent and merit-based recruitment, promotion and dismissal, offering an objective appeal procedure, having clear criteria for motivating staff and striving for gender balance. In a few instances, GRECO recommended to build or enhance these principles, stressing that vacancies in the police should be advertised, rather than candidates being "hand-picked" by means of transfers from the civil service. GRECO also pointed out that selection should be based on clear objective criteria as opposed to subjective preferences, that no-one should unduly influence the process and

that the highest superiors should not be above this rule. Moreover, GRECO stressed the importance of security checks at regular intervals throughout the careers of law enforcement staff as their personal circumstances are likely to change over time and, on occasion, make them more vulnerable to possible corruption risks (financial problems arising for example as a result of a mortgage or consumer loan, divorce, the illness of a relative, the bankruptcy of a spouse, radicalisation, etc.).

Conflicts of interest

Fairness and impartiality are paramount for all those exercising a public function; they are particularly important for law enforcement. Law enforcement personnel need to be proactive in dealing with their own conflicts of interests. GRECO recommended to some countries to have a more streamlined approach, with clear rules and oversight of their implementation.

Prohibition or restriction of certain activities

In some countries the rules are more stringent than in others in prohibiting law enforcement from performing any other activity than their work functions. A few explicitly prohibit law enforcement officials from performing supervisory or control functions in relation to the contracts in which they or their relatives may have a personal or financial interest. In most countries evaluated, GRECO issued a recommendation in relation to secondary employments for law enforcement.

In some cases, GRECO recommended to "have a streamlined system for authorisation of secondary employment with effective follow-up". In other instances, GRECO advised them to study the issue carefully to be better placed to decide if additional measures are needed to limit such participation and if so, establish clear criteria under which permissions to exercise them could be granted.

In some cases, GRECO recommended to consider or, more strictly, to introduce specific mechanisms for prevention and managing conflicts of interests after law enforcement officers leave their office, including examination of the practice more thoroughly in order to limit unrestricted permissions with regard to post-employment. The lack of rules on revolving doors in the public sector of some countries was already noted by GRECO in the 2nd Evaluation Round. In the case of law enforcement, GRECO underlined the risks this poses to their integrity. In this respect, GRECO referred to Recommendation No. R(2000)10 on codes of conduct for public officials, Article 26, stating that "the public official should not take improper advantage of his or her public office to obtain the opportunity of employment outside the public service".[8]

Declaration of assets, income, liabilities and interests

As regards declarations of assets, income, liabilities and interests, GRECO recommended to (i) introduce a robust, effective and regular system of declaration, including for the top management; (ii) ensure information is publicly and easily accessible and that the system is effectively implemented; and (iii) consider extending them to spouses and dependent family members.

Oversight and enforcement

This topic attracted the highest level of attention from GRECO. The reason for that is that oversight and enforcement are key to ensure the effectiveness of the system. A few countries were recommended to develop stronger risk management systems, making sure that these risks are addressed, and that oversight is in place. Special attention was paid to preventing the risk of unauthorised access to registers and leaking of information. GRECO looked at how solutions for preventing corruption risks in the police found in some countries could be useful to others. These include the practice of multiple-eye and greater gender mainstreaming. Another example is the rotation of staff in areas exposed to risks of corruption.

GRECO was particularly concerned about the issue of the so-called "wall of silence", i.e. the informal rule among law enforcement officers not to report their colleagues' misconduct or offences. GRECO believes that transparency is an essential tool for upholding citizens' trust in the functioning of the Police Authority and is a guarantee against any public perception of self-interest or self-protection within the profession. With that in mind, a few countries were reminded of the obligation for their police to report not just corruption but also

8. Recommendation No. R (2000) of the Committee of Ministers to Member States on Codes of Conduct for Public Officials, Adopted by the Committee of Ministers at its 106th Session on 11 May 2000.

integrity related misconduct. The majority of the countries reviewed were given a recommendation regarding the protection of whistleblowers in law enforcement, with a special focus on dedicated guidance and training for all levels of hierarchy. In that respect, special attention was paid to setting up or strengthening internal inquiry functions, making sure that they have the powers and resources to conduct independent investigations.

Selected good practice

Corruption prevention in central government (including top executive functions)

Codes of Conduct for public institutions & regional government – Spain

Public institutions have adopted their own codes of conduct, e.g. the Bank of Spain, the National Securities Market Commission, etc. Moreover, several regions have developed their own codes for persons with top executive functions at their respective level of Government. The model of the Basque Country was quoted by non-governmental representatives as particularly innovative in this domain: not only has a Code of Conduct been adopted, but a Commission of Public Ethics (Comisión de Ética Pública) which oversees its implementation has also been established. The latter body has a mixed composition bringing together (two) members from the Basque Government and (two) renowned professionals on ethics and integrity – who may come from the public or the private sector. This good practice could serve as inspiration, as applicable, to the central level.

A Handbook for ministers – Denmark

On appointment ministers are provided with a handbook which deals with a variety of issues relevant for the work of a minister (i.e. information on intergovernmental work, the legislative process, ministers' legal and political responsibility, the rules and guidelines for civil servants' advice and assistance). The handbook also contains guidance on certain integrity matters, by including the guidelines relating to ministers' acceptance of gifts and the rules and guidelines relating to ministers' occupations and financial interests.

Selected good practice

Corruption prevention in law enforcement agencies

A Code of Ethics for the Police – Malta

A Code of Ethics for the Police was adopted in 2002. It contains various references and comments concerning the subject of integrity, honesty, neutrality, professionalism, fairness. Malta has comprehensive general rules guiding the conduct of law enforcement officers in their daily work, either in the form of ethical principles or of disciplinary requirements.

Mechanism for complaints by the public about police action – The Netherlands

This is a three-stage process:

i. possibility of mediation;
ii. under the responsibility of the Police Commissioner, who will obtain advice from an independent committee of the region (composed typically of a mix of trusted persons, lawyers, civil servants – appointed by the Minister);
iii. complaint submitted to the National Ombudsman.

The complaints mechanism of the National Police Corps (NPN) is well structured and a number of complaints are dealt with and resolved in an efficient manner through the mediation phase.

Gender diversity is key in the prevention of groupthink and, in turn, of corruption. GRECO has issued a number of 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).

GRECO's media presence is sustained and growing.[9] Communication (through traditional and social media) is embedded in GRECO's work and allows information about GRECO's recommendations in every country to be widely spread and debated. While GRECO's reports are only published with the consent of the country concerned, all countries but one (Belarus) allow publication rather swiftly. GRECO's website is increasingly consulted, as is GRECO's Newsletter.

9. See http://www.coe.int/en/web/greco/greco-in-the-media

FEATURE ARTICLE

The European Public Prosecutor's Office

Laura KOVESI, Chief European Public Prosecutor

Rule of law is one of the fundamental values of the European Union, lying at its very foundation.

Preserving it and holding responsible those who abuse the confidence of the European citizens is essential in maintaining the legitimacy of the Union, especially in a time of crisis of confidence.

The creation of the European Public Prosecutor's Office, which will hopefully become operational at the end of 2020, is an important step in this direction, with the potential to completely change the paradigm in the field of criminal justice.

Establishing a European prosecution office with the power to investigate and prosecute crimes such as fraud, corruption or serious cross-border VAT fraud in all the participating Member States represents a long-waited response to the evolution of the crime phenomenon.

The European Commission estimates[10] that in the area of VAT fraud alone, cross-border schemes generate budgetary losses of around EUR 50 billion a year, almost a third of the whole EU budget. This figure indicates that the existing ways of combatting such threats are obsolete and a new approach is needed if we want to change something.

In an area of free movement of people, goods and capital, one cannot efficiently fight crime when the law enforcements' powers stop at the national borders. Reality showed that judicial cooperation has its limits and national priorities are not always the same as the European ones.

The adequate instrument to combat a European problem is a European institution.

The goal of this new approach is to increase the level of protection for European funds and to recover to the EU budget a significant part of the damages created by fraudsters.

The EPPO's success would provide a template for further developments in creating a common European criminal justice area, by forming the basis for a discussion on whether the approach should be extended to fighting other types of serious crime.

I am honored and excited, as the first European Chief Prosecutor, to bring my contribution toward achieving these goals.

I want the EPPO to be a flexible, result-oriented institution, whose effectiveness of proceedings will be accompanied by strict compliance with the fundamental guarantees of the persons who are subject to the investigations.

In order to properly achieve its mission, the EPPO will have to be fully independent, acting only in the interests of the EU, without taking any instructions from either European or national authorities.

I also want it to become a center of excellence in the area of financial investigations and seizure of criminal assets, by implementing advanced standards in forensic accounting and data analysis.

My previous experience as the Chief Prosecutor of the Romanian National Anticorruption Directorate makes me also acutely aware of the challenges we are facing.

Navigating through the specifics of 22 legal systems with different guarantees for the suspects and procedural rules on the admissibility of evidence, as the EPPO will have to do, is a difficult job for any lawyer, even more so for a prosecution office dealing exclusively with cases of complex cross-border fraud.

10. Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee of 7 April 2016 on an action plan on VAT, Towards a single EU VAT area – Time to decide, COM(2016) 148, p. 3.

Cooperation between the European Public Prosecutor's Office and non-participating Member States, as well as third countries, will represent another challenge. I hope that the use of the Council of Europe's Mutual Legal Assistance Convention and Criminal Law Convention on Corruption will represent an important tool on that regard, especially in the context of the EU becoming an observer in GRECO.

Another significant, more immediate challenge will be ensuring that the EPPO has adequate resources for fulfilling its role. If we want the European Public Prosecutor's Office to be able to successfully prosecute increasingly sophisticated crimes and to bring added value to the existing framework, it needs to have enough European delegated prosecutors, case analysts, financial investigators and support staff in order to process and analyze all incoming information, to investigate complex money flows and huge volumes of data, to use covert investigative techniques and so on.

Each of these challenges, if inadequately addressed, has the potential of turning the EPPO into a largely ceremonial institution, which would represent a serious letdown of the expectations that led to its creation.

The discussions that I had so far with the EU Commission, Parliament and Council, as well as with representatives of the participating Member States give me reasons to be optimistic that we will find enough support to establish the kind of EPPO that could really be a game changer in the fight against fraud.

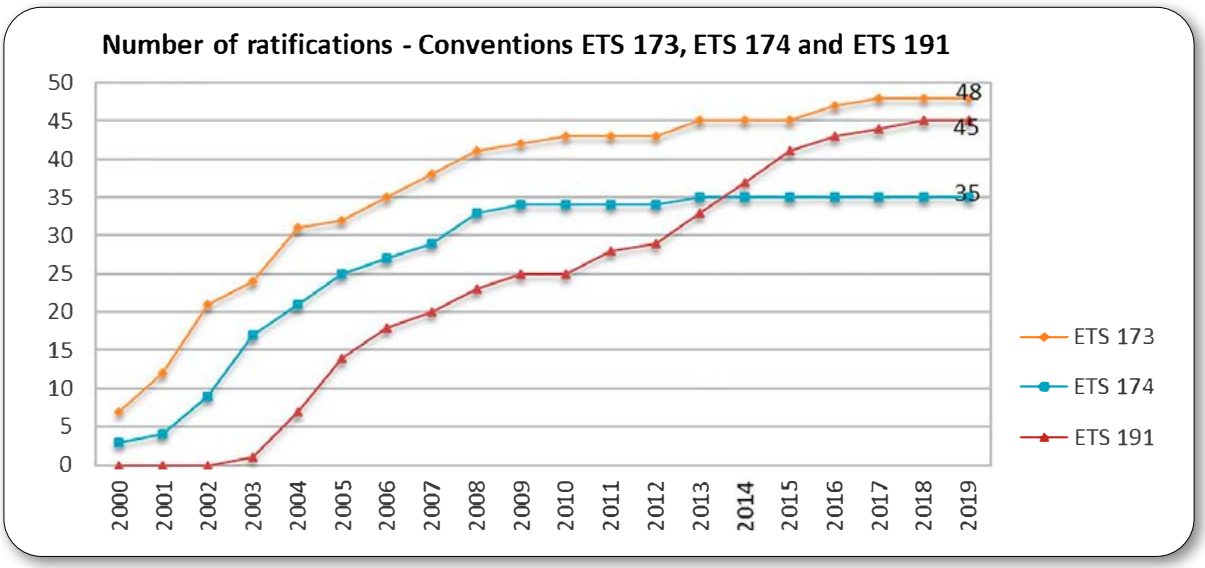
WORKING FRAMEWORK

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). The United States of America signed it (in 2000). In 2019, there were no further signatures/ratifications of the three treaties



While it is welcomed that the Criminal Law Convention (ETS 173) and its Protocol (ETS 191) are widely ratified, it is regrettable that at end 2019, 14 GRECO member states had still not ratified the Civil Law Convention on Corruption (ETS 174) 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 (six) 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

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[11]

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

11. See https://www.coe.int/fr/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 2014, 2015 and 2017). In respect of the same member state, GRECO published a declaration of non-conformity in 2019.

5th EVALUATION ROUND – PARAMETERS

GRECO's 5th Evaluation Round which was launched in 2017 is devoted to *Corruption prevention and promoting integrity in central governments (top executive functions) and law enforcement agencies*. Directing attention to central government (top executive functions) constitutes a logical extension to the 4th Round with its implications for shaping citizens' attitudes vis-à-vis their political institutions and democracy in general. Furthermore, while law enforcement authorities form a cornerstone of the fight against corruption and their integrity is therefore fundamental, experience shows that the specific risk factors involved in the work of law enforcement agencies warrant careful consideration.

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

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

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

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

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

12 In this context, the term "constitutional set-up" is to be understood as meaning a country's constitution, practice and specificities.
13 Administrative customs services and tax authorities are excluded from this evaluation.

GOVERNING STRUCTURES AND MANAGEMENT

The 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 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 Autumn 2019, Agnès MAITREPIERRE left the position of Vice-President due to new professional responsibilities and Monika OLSSON, Director of the Division for Criminal Law of the Ministry of Justice of Sweden was elected Vice-President in December 2019. In 2019, the Bureau was composed of the President, Vice-President, and Monika OLSSON, Ministry of Justice (Sweden) – replaced in December by Panagiota VATIKALOU, Presiding Judge, First Instance Court of Athens (Greece); Aslan YUSUFOV, Office of the Prosecutor General (Russian Federation); Vita HABJAN BARBORIČ, Commission for the Prevention of Corruption (Slovenia); Ernst GNAEGI, Federal Ministry of Justice (Switzerland); and David MEYER, Ministry of Justice (United Kingdom).

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

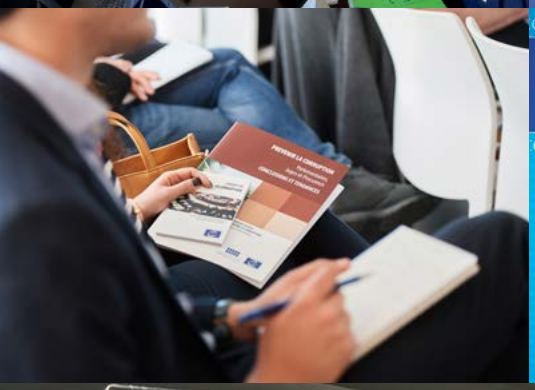
Statutory Committee – Budget and Programme of Activities

The Statutory Committee is composed of the Permanent Representatives of all Council of Europe member states (the Committee of Ministers) and representatives of the GRECO member states that are not members of the Organisation (Belarus and the United States of America in 2019 and Kazakhstan since January 2020). 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 and GRECO's annual programme of work. The Statutory Committee, chaired in 2019 by Emil RUFFER, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of the Czech Republic to the Council of Europe, met twice.

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).











GRECO
Group of States against Corruption
Groupe d'États contre la corruption
COUNCIL OF EUROPE
CONSEIL DE L'EUROPE

APPENDICES

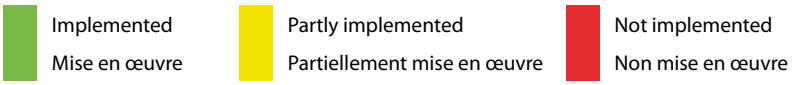
Appendix 1 – GRECO'S Mission

The 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.

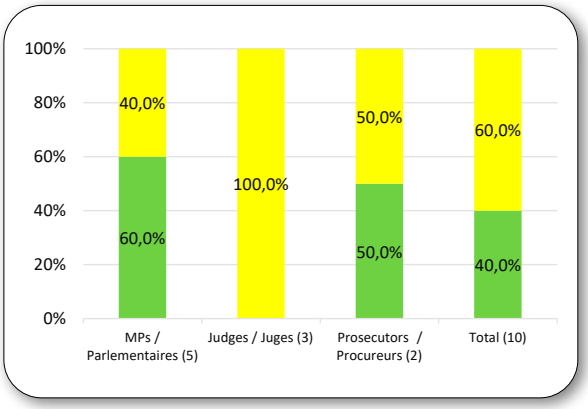
The clear stated political objective of strengthening the capacity of member states to prevent and fight corruption is served by a monitoring model designed to provide each member state with a detailed analysis and set of recommendations that are tailored to the specific architecture of each country. 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

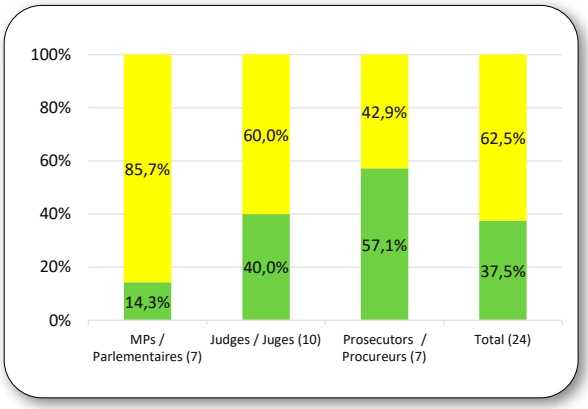
Statistics covering all assessments made public by end 2019 – 42 member States[14]



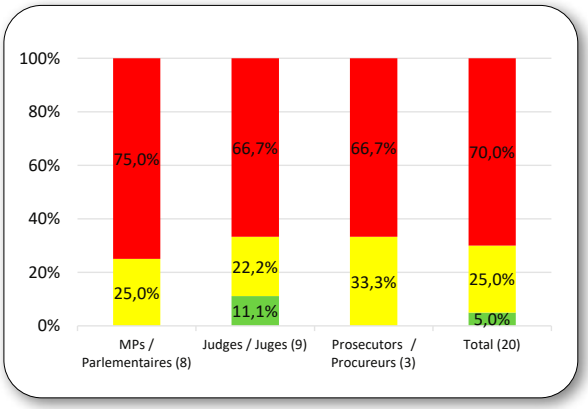
Albania/Albanie (2018)



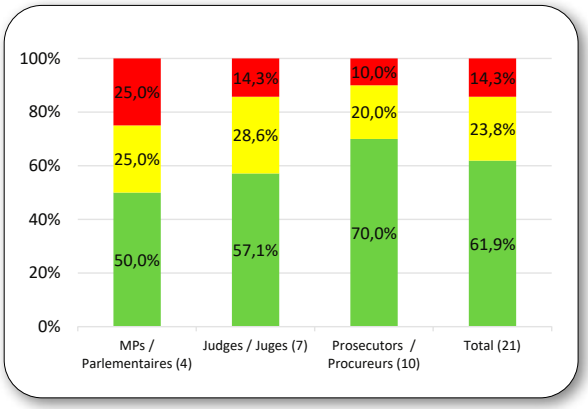
Armenia/Arménie (2019)



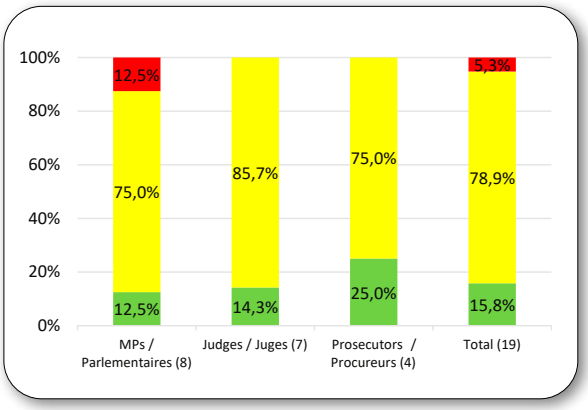
Austria/Autriche (2018)



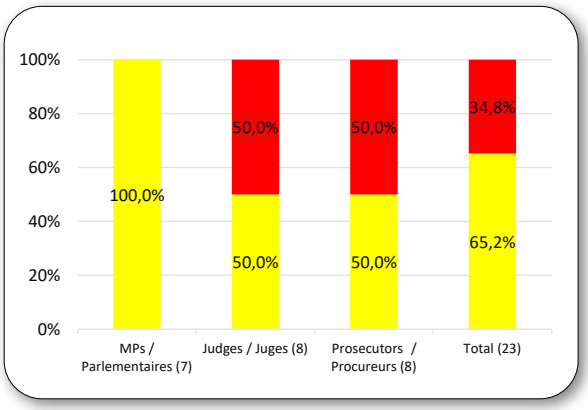
Azerbaijan/Azerbaïdjan (2019)



Belgium/Belgique (2019)

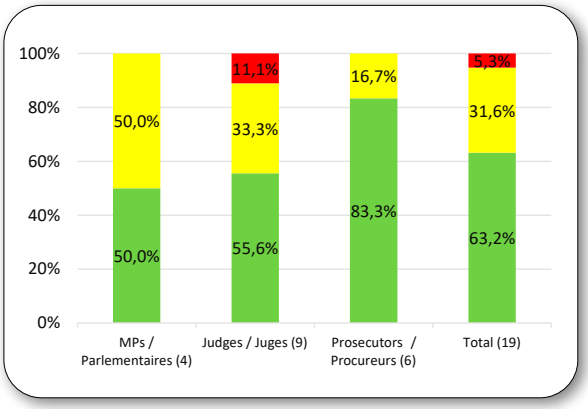


Bosnia and Herzegovina/Bosnie-Herzégovine (2018)

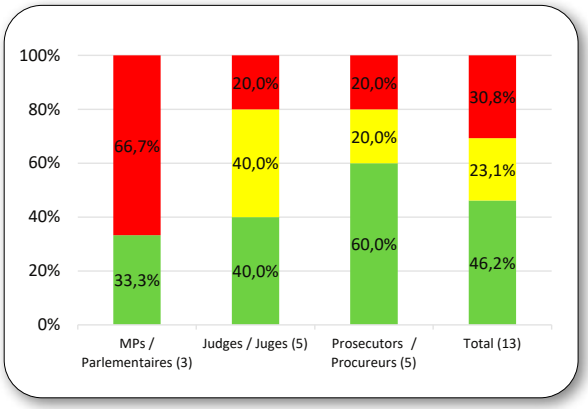


14. This appendix covers 42 member states assessed in the 4th Evaluation Round by end 2019. The statistics do not take into account the situation recorded in reports not made public by a member state by end 2019. The numbers in brackets refer to the number of recommendations issued under each category – when GRECO issued the same recommendation to 2 or 3 categories the recommendation is counted twice or three times for the purpose of these statistics. The year refers to the year in which the most recent assessment was made/made public.

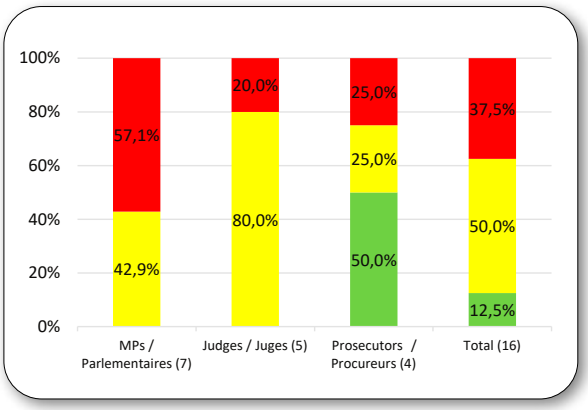
Bulgaria/Bulgarie (2017)



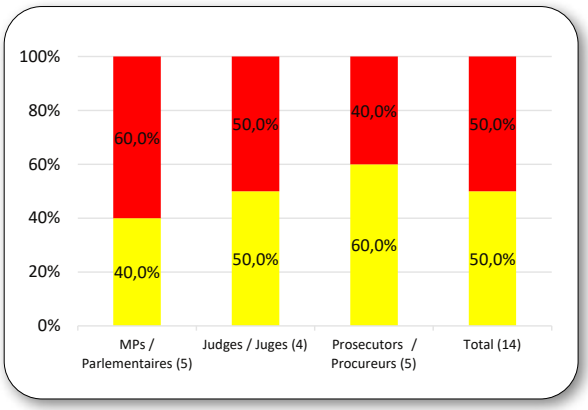
Croatia/Croatie (2018)



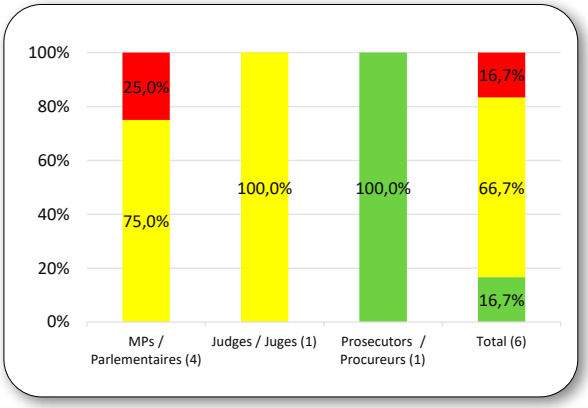
Cyprus/Chypre (2018)



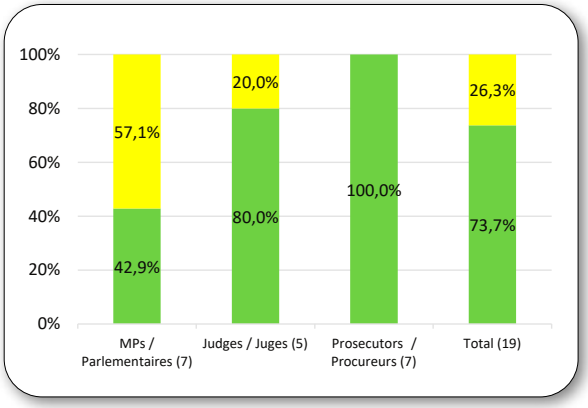
Czech Republic/République tchèque (2018)



Denmark/Danemark (2018)

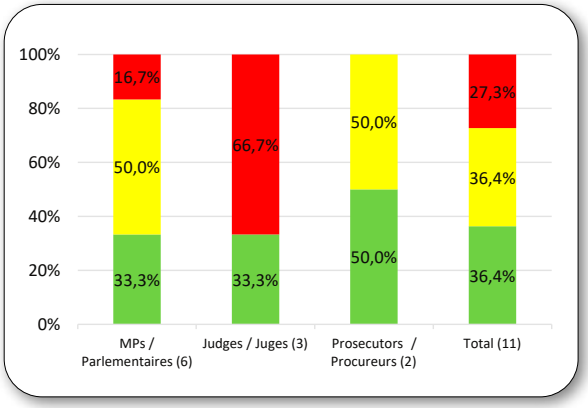


Estonia/Estonie (2017)

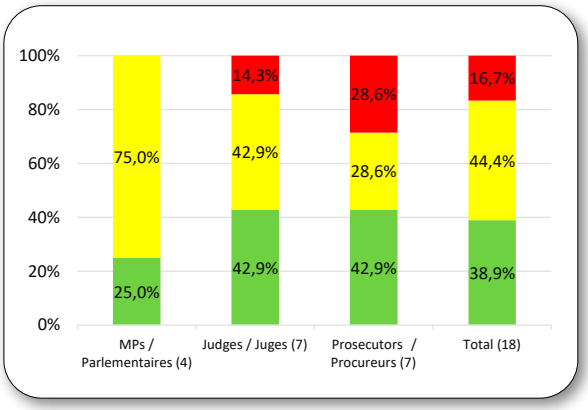


Finland/Finlande (2017)

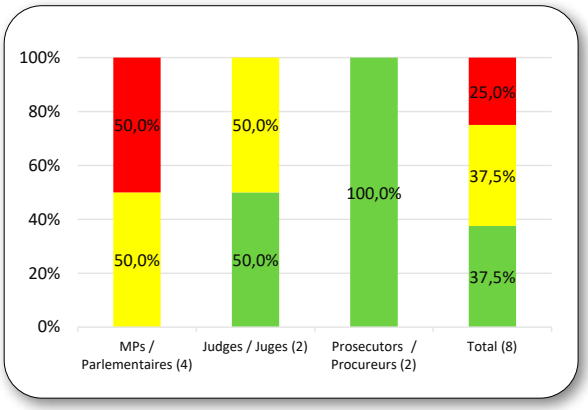
France (2018)



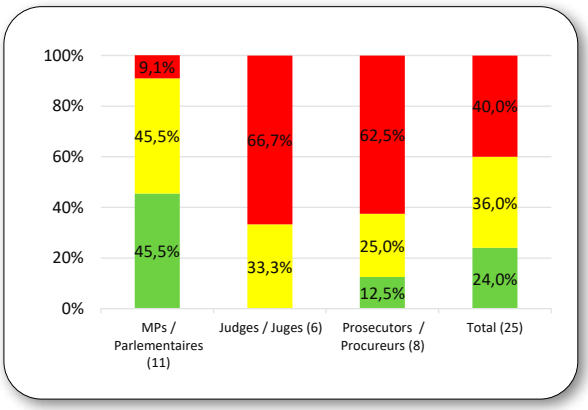
Georgia/Géorgie (2019)



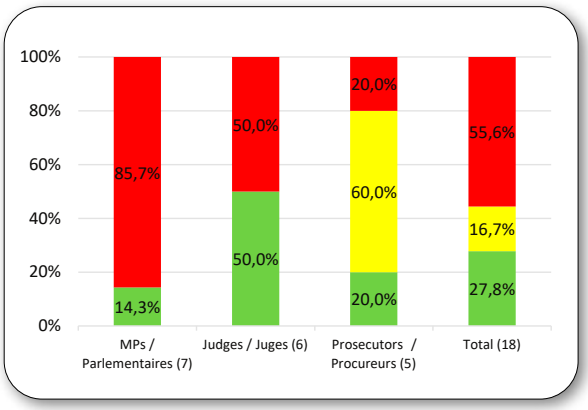
Germany/Allemagne (2019)



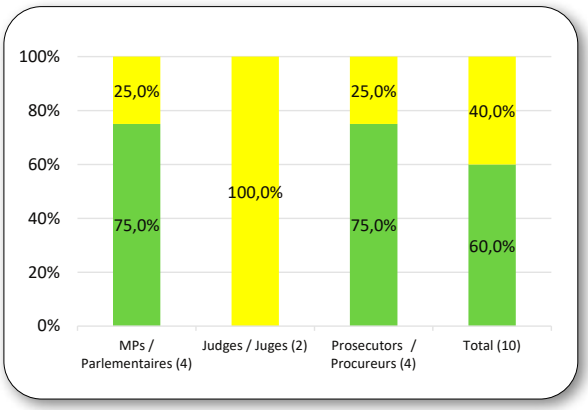
Greece/Grèce (2017)



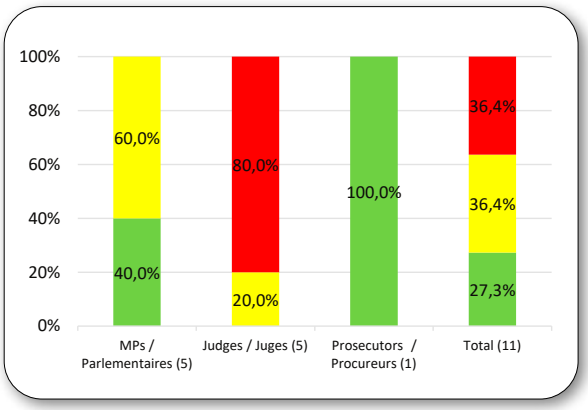
Hungary/Hongrie (2018)



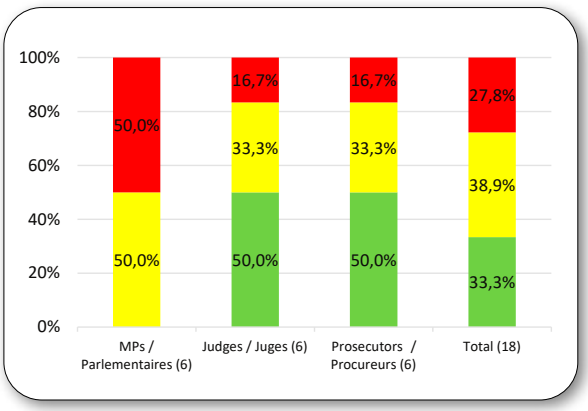
Iceland/Islande (2019)



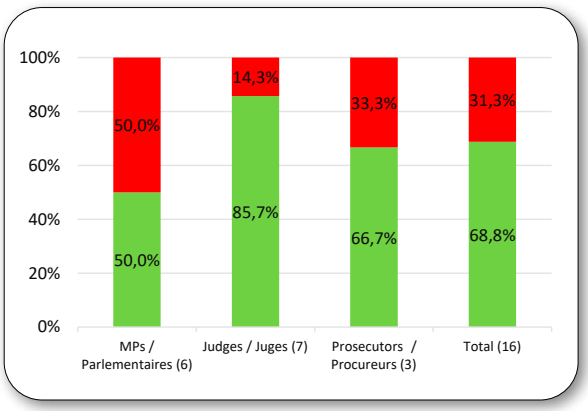
Ireland/Irlande (2018)



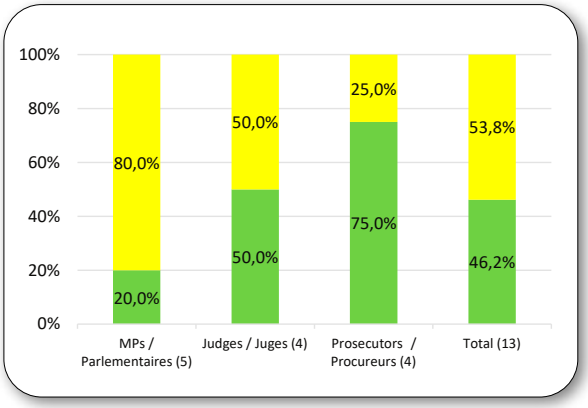
Italy/Italie (2018)



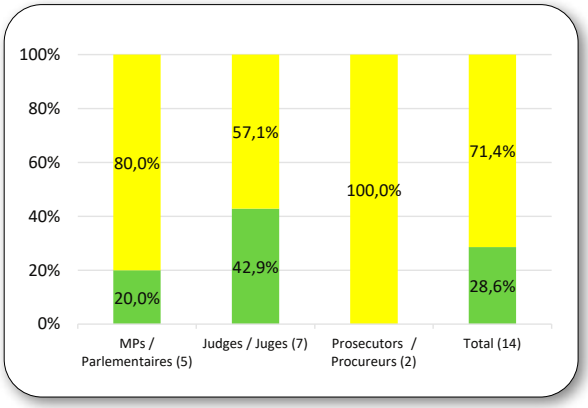
Latvia/Lettonie (2019)



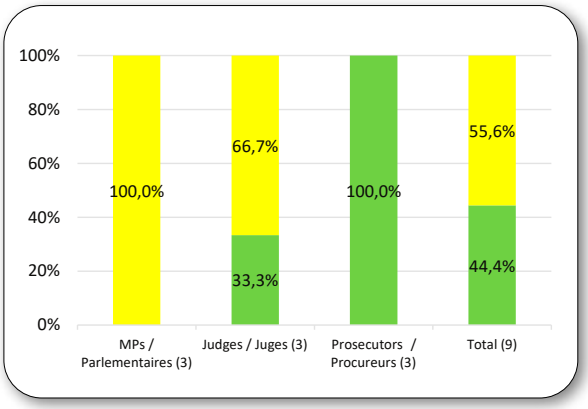
Lithuania/Lituanie (2019)



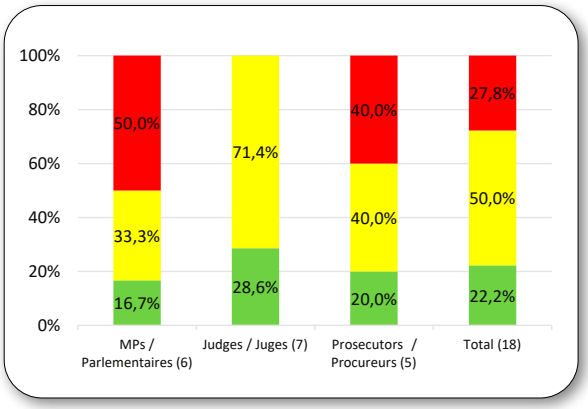
Luxembourg (2019)



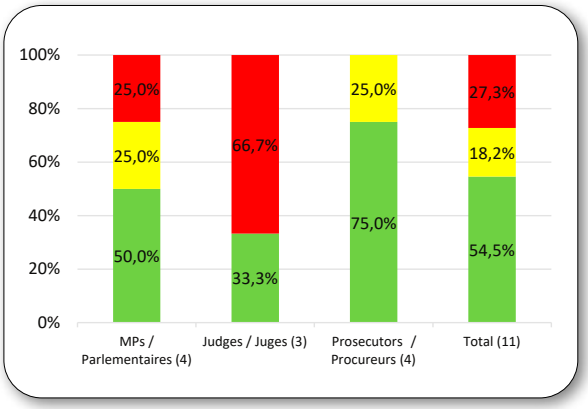
Malta/Malte (2019)



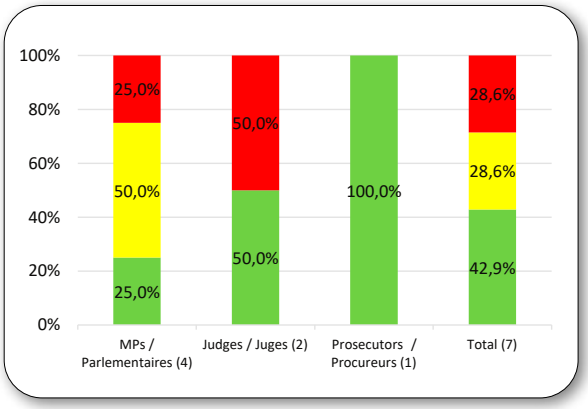
Republic of Moldova/République de Moldova (2018)



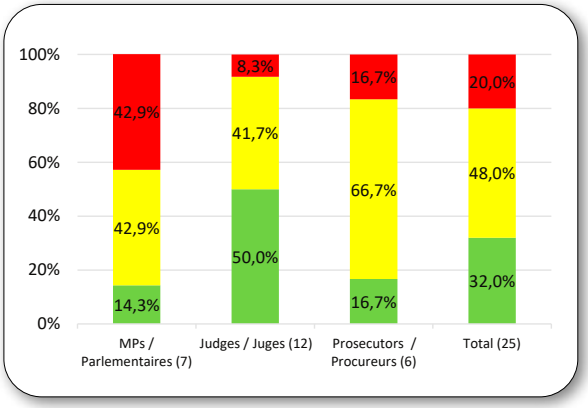
Montenegro/Monténégro (2017)



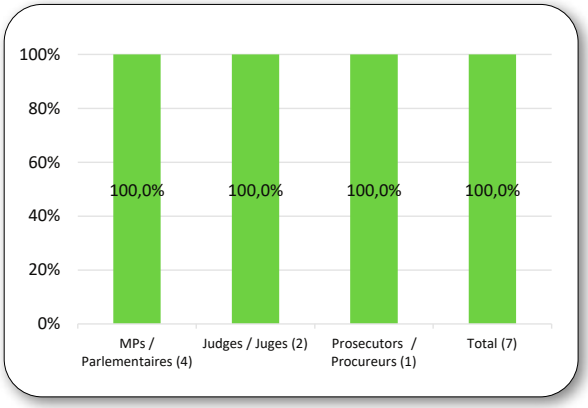
Netherlands / Pays-Bas (2018)



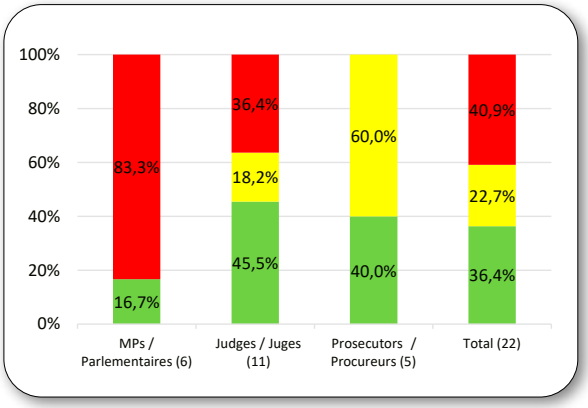
North Macedonia/Macédoine du Nord (2018)



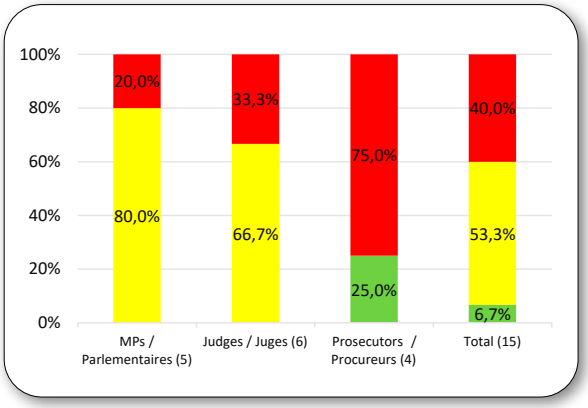
Norway/Norvège (2019)



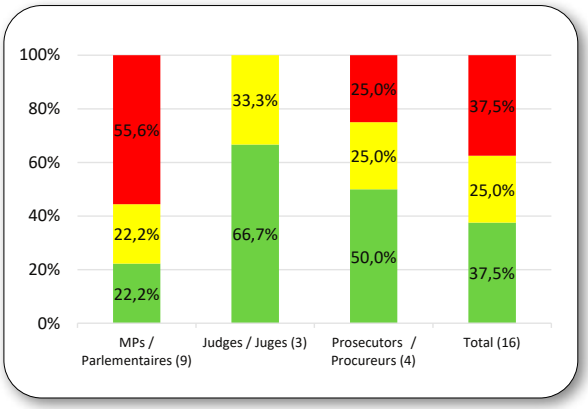
Poland/Pologne (2019)



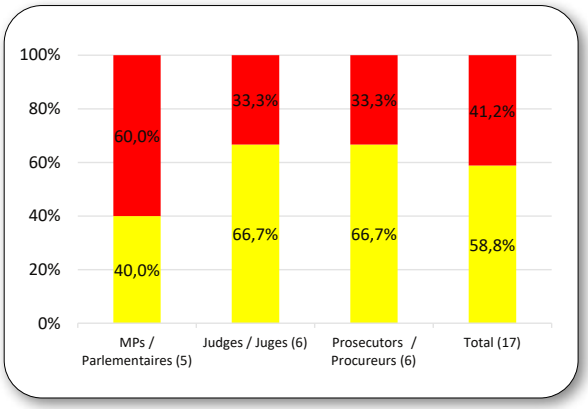
Portugal (2019)



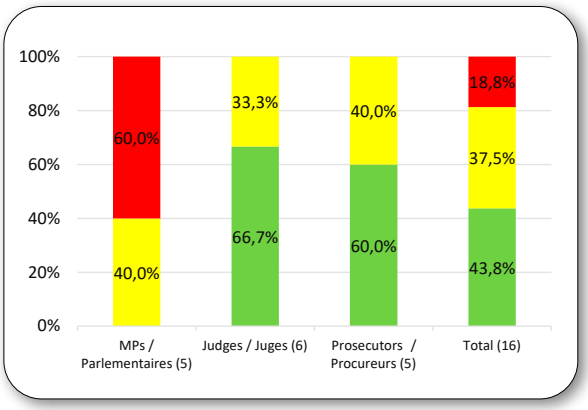
Romania/Roumanie (2019)



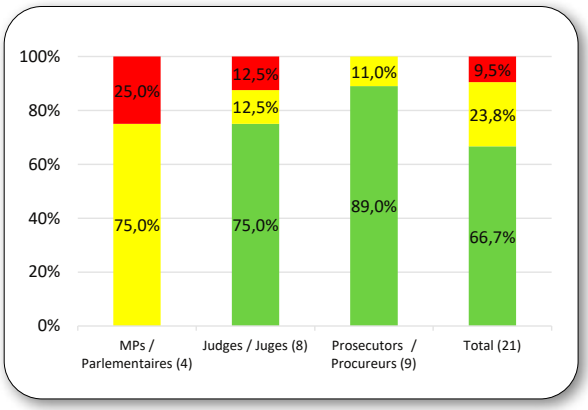
Serbia/Serbie (2019)



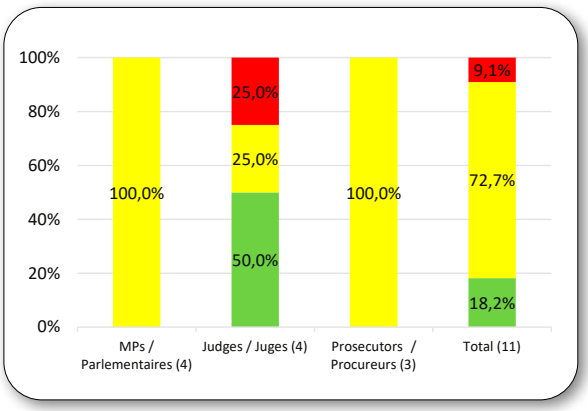
Slovak Republic/République slovaque (2019)



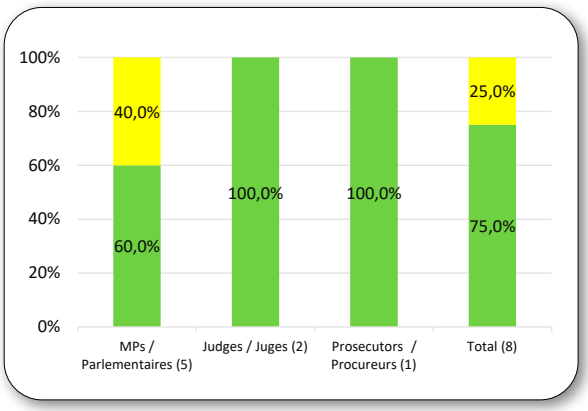
Slovenia/Slovénie (2018)



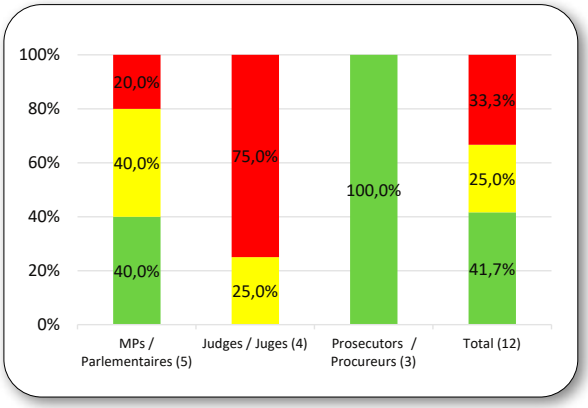
Spain / Espagne (2019)



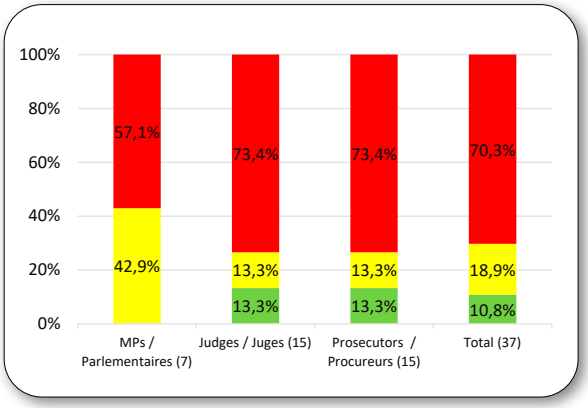
Sweden / Suède (2017)



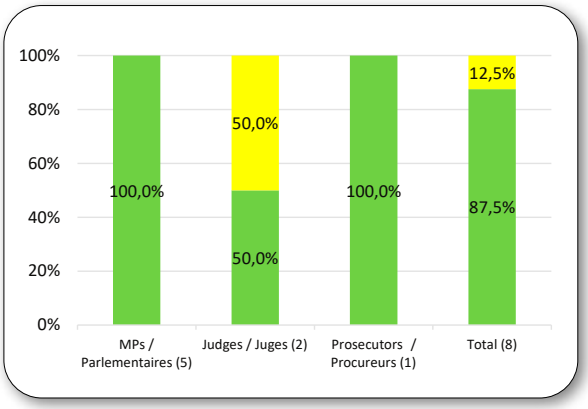
Switzerland/Suisse (2019)



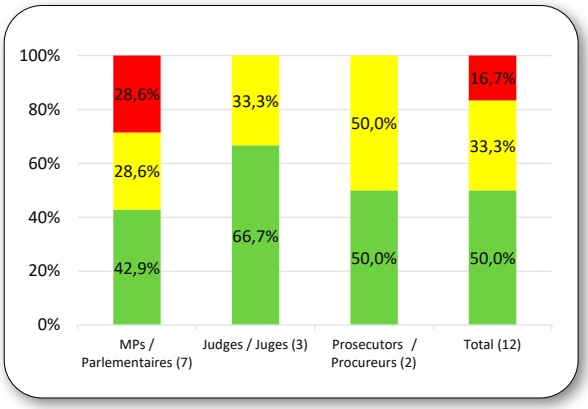
Turkey/Turquie (2019)



United Kingdom/Royaume-Uni (2017)



United States of America/États-Unis d'Amérique (2019)



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 2019

5th Evaluation Round

- Spain (21-25 January)
- France (8-12 April)
- Croatia (8-12 April)
- Belgium (3-7 June)
- Albania (18-22 November)
- Norway (25-29 November)
- Germany (9-13 December)

4th Evaluation Round

- Liechtenstein (24-28 June)
- San Marino (9-13 September)
- Belarus (14-18 October)

Rule 34 – ad hoc procedure in exceptional circumstances

Visite ad hoc

- Cyprus (7-8 February)

Rule 32 – 4th Evaluation Round non-compliance procedure[15]

High-level visit

- Hungary (1 March)

Meetings 2019

GRECO Plenary

- GRECO 82 (18-22 March)
- GRECO 83 (17-21 June)
- GRECO 84 (2-6 December)

GRECO Bureau

- Bureau 86 (15 February)
- Bureau 87 (17 May)
- Bureau 88 (18 October)

Conference

- High-level conference: "GRECO: past, present & future" organised in cooperation with the French Presidency of the Committee of Ministers of the Council of Europe to mark GRECO's 20th anniversary (Strasbourg, 17 June)[16]

GRECO Statutory Committee

- 25th Meeting – Exceptional meeting (28 June)
- 26th Meeting – Programme 2020/2021 and Budget 2020 (22 November)

15. Rule 32 of GRECO's Rules of Procedure – globally unsatisfactory implementation.
16. Conference website: https://www.coe.int/en/web/greco/20th-anniversary-of-greco.

Evaluation reports adopted in 2019

5th Evaluation Round

- Belgium
- Croatia
- Denmark
- France
- Malta
- North Macedonia
- Slovak Republic
- Spain
- Sweden

Rule 34 – ad hoc procedure in exceptional circumstances

- Ad hoc (Rule 34) report on Greece
- Ad hoc (Rule 34) report on Poland – follow-up report
- Ad hoc (Rule 34) report on Slovenia

Compliance reports adopted in 2019

4th Evaluation Round compliance procedure

- Azerbaijan, Georgia, Iceland, Latvia, Lithuania, Malta, Netherlands, Russian Federation, Slovak Republic, Switzerland, Ukraine, United States of America – procedures on-going
- Bulgaria, Montenegro, Norway – procedures closed

Rule 32 – Globally unsatisfactory: non-compliance procedure

- Armenia, Germany, Monaco, Poland – procedures opened
- Czech Republic, Denmark, Luxembourg, Portugal, Romania, Turkey – procedures maintained
- Belgium, Spain, Serbia – procedures closed

3rd Evaluation Round compliance procedure

- Denmark, Turkey – procedures on-going
- Germany, Italy, Russian Federation- procedures closed

Rule 32 – Globally unsatisfactory: non-compliance procedure

- Belarus – procedure opened
- Switzerland – procedure closed

Joint 1st and 2nd Evaluation Rounds compliance procedure

- Belarus – Public declaration of non-compliance

Appendix 4 – GRECO Delegations (at 06/12/2019)

ALBANIA / ALBANIE

Ms Fjoralba CAKA (Head of delegation)
Deputy Minister
Ministry of Justice

Substitut/e
Mr Nino STRATI
Specialist
General Directorate of Policies in the field of Justice
Ministry of Justice

Mr Mirjon BRAHIMLLARI
Head of Sector
Justice and Anti-Corruption Programmes
Ministry of Justice

Substitut/e
Ms Suzana FRASHËRI
Head of Sector
Policies and Strategies in the field of Justice
Ministry of Justice

ANDORRA / ANDORRE

M^me^ Eva GARCIA LLUELLES (Chef de délégation)
Ministère de la Justice et de l'Intérieur
Relations et coopération internationales
dans le domaine juridique

ARMENIA / ARMENIE

Ms Kristinne GRIGORYAN (Head of delegation)
Deputy Minister of Justice

Substitut/e
Mr Srbuhi GALYAN
Deputy Minister of Justice

Ms Mariam GALSTYAN
Head of Division for Drafting Anti-Corruption Policies
Department for Drafting Anti-Corruption and
Penitentiary Policies
Ministry of Justice

Substitut/e
Mr Suren KRMOYAN
Adviser to the Deputy Prime Minister

AUSTRIA / AUTRICHE

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

Substitut/e
Head of Unit 2.3 International Cooperation
Federal Bureau of Anti-Corruption
Federal Ministry of the Interior

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

Substitut/e
Ms Evelyn DOJNIK
Unit 2.3 International Instruments and Cooperation
Bureau of Anti-Corruption
Ministry of the Interior

AZERBAIJAN / AZERBAIDJAN

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

Substitut/e
Adviser
Law Enforcement Coordination and Military
Issues Department
Administration of the President

Mr Kamran ALIYEV
Deputy Prosecutor General
Director – Anti-Corruption Directorate
General Prosecutor's Office

Substitut/e
Mr Elnur MUSAYEV
Senior Prosecutor
Anticorruption Directorate
Prosecutor's Office

BELARUS

Mr Uladzimir KHOMICH (Head of delegation)
Director
Research and Practical Centre for Problems of Reinforcing Law and Order
General Prosecutor's Office

Substitut/e
Ms Hanna KARABELNIKAVA
Associate Director
Research and Practical Centre for Problems of Reinforcing Law and Order
General Prosecutor's Office

Mr Pavel SASCHEKO
Head of Department
Research and Practical Centre for Problems of Reinforcing Law and Order
General Prosecutor's Office

Substitut/e
Mr Igor SEVRUK
Head of Department
Supervision over the National Investigative Committee
General Prosecutor's Office

BELGIUM / BELGIQUE

M. Ricardo PARRONDO RAMOS (Chef de délégation)
Attaché au Service de la Politique Criminelle
Direction générale Législation, Libertés et Droits Fondamentaux
Service Public Fédéral Justice

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

M. Marc VAN DER HULST
Secrétaire Général Adjoint
Parlement fédéral
Palais de la Nation

Substitut/e
M^{me} Ria MORTIER
Présidente du Conseil supérieur de la Justice et de la Commission de nomination et de désignation néerlandophone
Avocat général à la Cour de Cassation
Conseil supérieur de la Justice

BOSNIA AND HERZEGOVINA / BOSNIE-HERZEGOVINE

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

Mr Nenad EŠPEK
Expert Associate for Combating crime committed through information and communication technologies and copyright protection
Section for Combating Organized Crime & Corruption
Ministry of Security

BULGARIA / BULGARIE

Mr Georgi RUPCHEV (Head of delegation)
State Expert
Cooperation in Criminal Law Matters Division
Directorate of International Legal Cooperation and European Affairs
Ministry of Justice

Mr Petar PETKOV
Public Prosecutor
Supreme Prosecutor's Office

Substitut/e
Mr Florian FLOROV
Chief Expert
Directorate of International Legal Cooperation and European Affairs
Ministry of Justice

CROATIA / CROATIE

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

Substitut/e
Mr Davor DUBRAVICA
Magistrate

Mr Dražen JELENIĆ (Head of delegation)
State Attorney General

Substitut/e
Mr Krešimir SIKAVICA
General Police Directorate
Economic Crime and Corruption Department
Division for Corruption Department
Ministry of the Interior

CYPRUS / CHYPRE

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

Substitut/e
Ms Theodora PIPERI-CHRISTODOULOU
Law officer
Counsel of the Republic A'
Office of the Attorney General

Ms Rena PAPAETI-HADJICOSTA
Attorney of the Republic
Office of the Attorney General

CZECH REPUBLIC / REPUBLIQUE TCHEQUE

Ms Helena KLIMA LIŠUCHOVÁ (Head of delegation)
Junior Deputy Minister in charge of
International Affairs
Ministry of Justice

Substitut/e
Mr Matej BLAŽEK
Senior Ministerial Counsellor
Conflict of Interest and Anti-Corruption Department
Ministry of Justice

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

DENMARK / DANEMARK

Mr Anders Dyrvig RECHENDORFF (Head of
Delegation)
Prosecutor
State Prosecutor for Serious Economic and
International Crime
International Unit

Substitut/e
Mr Stefan WEINSCHENCK
Head of Section
Ministry of Justice
Criminal Law Division

Substitut/e
Ms Rebekka HAVE ENEVOLDSEN
Ministry of Justice
Criminal Law Division

ESTONIA / ESTONIE

Ms Mari-Liis SÖÖT (Head of delegation)
Head of Analysis Division
Criminal Policy Department
Ministry of Justice

Ms Kätlin-Chris KRUUSMAA
Advisor, Analysis Division
Criminal Policy Department
Ministry of Justice

Substitut/e
Mr Tanel KALMET
Advisor, Penal Law and Procedure Division
Criminal Policy Department
Ministry of Justice

FINLAND / FINLANDE

Mr Aarne KINNUNEN (a.i Head of delegation)
Head of Unit
Department of Criminal Policy
Ministry of Justice

Substitut/e
Mr Juuso OILINKI
Special Adviser
Department of Criminal Policy
Ministry of Justice

Mr Jouko HUHTAMÄKI
Ministerial Adviser
Police department
Ministry of the Interior

Substitut/e
Ms Venla MÄNTYSALO
Senior specialist
Department for Criminal Policy and Criminal Law
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. Vincent FILHOL (Chef de délégation)
Chargé de mission pour les affaires civiles et pénales internationales auprès du directeur des affaires juridiques
Ministère de l'Europe et des Affaires étrangères
Direction des affaires juridiques

Substitut/e
M^me^ Sophie LACOTE
Cheffe de bureau
Bureau du droit économique, financier et social, de l'environnement et de la santé publique
Direction des affaires criminelles et des grâces
Ministère de la Justice

M. Renaud JAUNE
Sous-Directeur du conseil, de l'analyse stratégique et des relations internationales
Agence française anticorruption (AFA)

Substitut/e
M. Emmanuel FARHAT
Chargé de mission Relations internationale
Agence française anticorruption (AFA)

GEORGIA / GEORGIE

Mr Zurab SANIKIDZE (Head of delegation)
Head of Analytical Department
Secretariat of the Anti-Corruption Council
Ministry of Justice

Substitut/e
Ms Pelagia MAKHAURI
Analytical Department
Secretariat of the Anti-Corruption Council
Ministry of Justice

Substitut/e
Ms Gulisa KAKHNIASHVILI
First Category Chief Specialist
Strategic Development Unit
Analytical Department
Secretariat of the Anti-Corruption Council
Ministry of Justice

GERMANY / ALLEMAGNE

Mr Markus BUSCH (Head of delegation)
Head of Division
Economic, Computer, Corruption-related and Environmental Crime Division
Ministry of Justice and Consumer Protection

Substitut/e
Ms Stephanie GOEBEL
Legal Officer
Integrity, Corruption prevention, Sponsoring Division
Ministry of the Interior

Ms Juliane MÜLLER
Legal Officer
Division II A 4 (Economic, Computer, Corruption-related and Environmental Crime)
Ministry of Justice and Consumer Protection

Substitut/e
Mr David AYDINTAN
Legal Advisor
Division PM 1 (Remuneration of Members)
Deutscher Bundestag
- Verwaltung –

GREECE / GRECE

Ms Maria GAVOUNELI (Head of delegation)
Professor in International Law
University of Athens
Faculty of Law

Substitut/e
Ms Panagiota VATIKALOU
Bureau Member / Membre du Bureau
Presiding Judge in the First Instance Court of Athens

Ms Fotoula NTINAKI
Special Inspector
Administrative Reforms
Office of General Inspector of Public Administration

Substitut/e
Mr Dimosthenis STINGAS
Judge by the Court of Appeal in Athens
Justice counsellor at the Permanent Representation of Greece to the EU

HUNGARY / HONGRIE

Mr Bálint VARRÓ (*acting* Head of delegation)
Legal and anti-corruption expert
Department of European Cooperation
Ministry of the Interior

Ms Magdolna CSABA
JHA expert
Department of European Cooperation
Ministry of the Interior

ICELAND / ISLANDE

Mr Björn THORVALDSSON (Head of delegation)
Public Prosecutor
Special Prosecutors Office

Mr Helgi Magnús GUNNARSSON
Deputy Director of Public Prosecution
Office of the Director of Public Prosecution

Substitut/e
Mr Pall THORHALLSSON
Director – Department of Legislative Affairs
Prime Minister's Office

IRELAND / IRLANDE

Ms Eileen LEAHY (Head of Delegation)
Criminal Justice Policy
Department of Justice and Equality

Substitut/e
Mr John GARRY
Criminal Justice Legislation
Department of Justice and Equality

Mr Steven FADIAN
Government Reform Unit
Department of Public Expenditure and Reform

Substitut/e
Ms Mary AUSTIN
Expenditure Management, EU Policy and Audit
Department of Public Expenditure and Reform

ITALY / ITALIE

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

Substitut/e
Ms Emma RIZZATO
Magistrate
Ministry of Justice

M. Raffaele CANTONE
Président de l'ANAC
Autorité Nationale Anti-Corruption

Substitut/e
Ms Nicoleta PARISI
Member of the Anti-Corruption National Authority

LATVIA / LETTONIE

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

Substitut/e
Ms Anna ALOSINA
acting Chief of the First Department
Corruption Prevention and Combating Bureau (KNAB)

LIECHTENSTEIN

Ms Elena KLIEN (Head of delegation)
Office for Foreign Affairs

Substitut/e
Mr Claudio NARDI
Office for Foreign Affairs

Mr Harald OBERDORFER
Lawyer | Ressort Justiz

Substitut/e
Mr Michael JEHLE
Judge | Landgericht

LITHUANIA / LITUANIE

NN (Head of delegation)

Ms Agne VERSELYTE
Adviser
International Law Group
Ministry of Justice

Substitut/e
Ms Živilė ŠADIANEC
Head of International Cooperation Division
Special Investigation Service

LUXEMBOURG

M. David LENTZ (Chef de délégation)
Procureur d'État adjoint
Parquet près le Tribunal d'arrondissement de Luxembourg
Cité Judiciaire

Substitut/e
M. Jean BOUR
Ancien Procureur d'État
Parquet du Tribunal d'Arrondissement de Diekirch

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

Substitut/e
M^{me} Cindy COUTINHO
Attachée
Ministère de la Justice
Direction des affaires pénales et judiciaires

MALTA / MALTE

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

Substitut/e
Mr Peter GRECH
Attorney General
Office of the Attorney General

Ms Nadia CAMILLERI
Office of the Attorney General

Substitut/e
Ms Victoria BUTTIGIEG
Assistant Attorney General
Office of the Attorney General

REPUBLIC OF MOLDOVA / REPUBLIQUE DE MOLDOVA

Mr Alexandru CLADCO (Head of delegation)
Prosecutor
Head of International Cooperation and European Integration
Department of the General Prosecutor's Office

Substitut/e
M^me^ Cornelia VICLEANSCHI
Ancien Procureur
Bureau du Procureur Général

Mr Valeriu CUPCEA
Senior Inspector
Legislation and Anti-corruption Expertise Directorate
National Anti-corruption Centre

MONACO

M. Jean-Laurent RAVERA (Chef de délégation)
Chef de Service du Droit International, des Droits de l'Homme et des Libertés Fondamentales
Direction des Affaires Juridiques

Substitut/e
M. Jean-Marc GUALANDI
Conseiller Technique – SICCFIN
Service d'Information et de Contrôle sur les Circuits Financiers Département des Finances et de l'Economie

Substitut/e
M. Maxime MAILLET
Administrateur
Direction des Services Judiciaires

MONTENEGRO

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Conseiller scientifique
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PRESIDENT OF THE STATUTORY COMMITTEE OF GRECO / PRÉSIDENT DU COMITÉ STATUTAIRE DU GRECO

Mr Emil RUFFER, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of the Czech Republic to the Council of Europe

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

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

No nomination

Pas de nomination

REPRESENTATIVE OF THE CDPC / REPRÉSENTANT DU CDPC

No nomination

Pas de nomination

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

Ms Katherine DELIKOURA
Chief Compliance Officer

OBSERVERS / OBSERVATEURS

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Ms France CHAIN
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Directorate for Financial and Enterprise Affairs

Ms Tanya KHAVANSKA
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Mr Jaroslaw PIETRUSIEWICZ
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Ms Simona MARIN
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Secretariat for Legal Affairs

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Head of Unit
Organised Crime and Drugs Policy Unit
DG Migration and Home Affairs
European Commission

Ms Irina STEFURIUC
Team leader

Ms Borbala GARAI
Policy officer

Appendix 5 – Working Together for Greater Impact

European Union (EU)

- Eastern Partnership (EaP) *Panel on Rule of Law – effective asset declaration systems* (Brussels, 29-30 April) – Secretariat
- *Article 36 Committee (CATS)* meeting (Brussels, 10 May; 13 May) – Secretariat
- Meeting with a delegation from the European Parliament *Group of the Greens* (Strasbourg, 18 September) – Secretariat
- Meeting with Mr Christian LEFFLER, Deputy Secretary General for Economic and Global Issues at the *European External Action Service* (EEAS) (Strasbourg, 1 October) – Secretariat
- European Commission *Experience sharing workshop – Corruption as a threat to security* (Brussels, 4 October) – Secretariat
- Meeting on cooperation between the Council of Europe and the *European Union Agency for Fundamental Rights* (FRA) (Strasbourg, 11 October) – Secretariat
- Meeting with European Parliament *Democracy, Fundamental Rights and Rule of Law Monitoring Group* (DFRMG) LIBE Committee (Strasbourg, 24 October) – Secretariat
- Meeting with the co-Chair, European Parliament *Interparliamentary group on anti-corruption*, Daniel FREUND (Group of the Greens/European Free Alliance) (Strasbourg, 24 October) – Secretariat
- Various official contacts on the process for granting to the EU observer status in GRECO – Secretariat
- Various bilateral consultations at the request of EU institutions: Secretariat-General of the European Commission; DGs Home, Near and Justice – Secretariat

Organisation for Economic Co-operation and Development (OECD)

- Meetings of the *Working group on bribery in international business transactions* – WGB (Paris, 7 March and 26 June) – Secretariat
- GRECO | OECD WGB *Ad hoc joint assessment visit to Greece* (Athens, 29 October) – Alexia KALISPERA, Head of Delegation in GRECO (Cyprus) and Ernst GNAEGI, Head of Delegation in GRECO (Switzerland)

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

- Bilateral meeting with Ingibjörg Sólrún GÍSLADÓTTIR, Director of ODIHR (Warsaw, 8 May) – Secretariat
- ODIHR | Transparency International (TI) *Boot camp on Political Corruption* (Warsaw, 8-9 May) – Secretariat
- Human Dimension Implementing Meeting – OSCE | GRECO | Transparency International (TI) side event – *Foreign funding of politics: a threat to democracy?* (Warsaw, 18 September) – GRECO Evaluator Yves-Marie DOUBLET (France)
- *Annual meeting of the Heads of Law Enforcement Departments of OSCE field operations* (Vienna, 25 September) – Christian MANQUET, Head of delegation in GRECO, Bureau member (Austria)

Organization of American States (OAS)

- Committee of experts of the follow-up mechanism for the implementation of the Inter-American Convention against Corruption – MESICIC *Panel discussion on international anticorruption mechanisms and best practices* (Washington DC, 10-11 September) – Secretariat

G20 Anti-corruption Working Group

- *Anti-corruption working group* – ACWG (Tokyo, 22-23 January) – Secretariat
- *Anti-corruption working group* – ACWG (Mexico City, 14 May) – Secretariat

United Nations

- Joint statement issued by the Presidents of the European Committee for the Prevention of Torture (CPT) and GRECO on the occasion of the 40th Session of the United Nations Human Rights Council (28 February) – GRECO President
- United Nations Convention against corruption *10th Session of the UNODC implementation review group* (Vienna, 27-29 May) – Secretariat
- UNODC *Expert Group Meeting (EGM) on corruption involving vast quantities of assets* (Oslo, 13 June) – Secretariat
- International Partnership against Corruption in Sport (IPACS) *Steering Committee* (Paris, 1 July) – Secretariat
- United Nations Convention against corruption *10th Session of the UNODC Open-ended Intergovernmental Working Group on the Prevention of Corruption* WGP (Vienna, 5-6 September) – Secretariat
- *8th Session of the Conference of the States Parties to the United Nations Convention against Corruption* COSP-8 (Abu Dhabi, 16-20 December) – President
- *International Partnership Against Corruption in Sport* (IPACS) *General Conference* (Abu Dhabi, 15 December) – Secretariat

Others

- Contact meeting with FIFA officials (Zurich, 29 January) – Secretariat
- European Affairs Committee of the Second Chamber of the Dutch Parliament *Hearing on the Rule of Law situation in Europe* (The Hague, 13 February) – Secretariat
- European College of Financial Investigations and Analysis of Financial Crimes (CEIFAC) *Conference on financial investigations as a tool against organised crime in Europe* (Strasbourg, 26 February) – Secretariat
- Italian National Anti-Corruption Agency (ANAC) *Workshop on the development of guidelines for codes of conduct for public administration* (Rome, 4 April) – Secretariat
- Moscow State Institute of International Relations (MGIMO) | Office of the Prosecutor General of the Russian Federation *International conference on the prevention and management of conflicts of interest among judges and prosecutors and judicial safeguards in the fight against corruption – Implementation of the Council of Europe standards in the Russian Federation* (Moscow, 17 April) – GRECO President; GRECO Evaluator Cornelia GÄDICK, Senior Public Prosecutor (Germany)
- Meeting with Pavel ZEMAN, Prosecutor General of the Czech Republic (Strasbourg, 6 May) – Secretariat
- People's Democratic Festival Denmark | Danish Helsinki Committee *Seminar on Human rights – the ultimate instrument against corruption?* Presentation on the nexus between Human Rights protection, rule of law and the fight against corruption (Bornholm, 13 June) – Secretariat
- Meeting with Jeroen CLARISSE, Secretary to the *Federal Ethics Committee of the Belgian Parliament* (Strasbourg, 19 June) – Secretariat
- International Political Science Association, *Political Finance and Political Corruption Research Committee RC-20* (Curitiba, 1-3 July) – Secretariat
- Bilateral meetings at the State and Justice Departments and the International Monetary Fund (IMF) (Washington DC, 10-11 September) – Secretariat
- Le Club des Juristes *Hearing* (Paris, 9 July) – Secretariat
- Meeting with representatives of the *African Union Advisory Board on Corruption* (AUABC) (Strasbourg, 19 September) – Secretariat
- Bureau of European and Eurasian Affairs (EUR) of the US State Department for the anti-corruption focal points in US embassies *Anticorruption Workshop* (Vienna, 4 November) – Secretariat
- XX International Congress of Penal Law *Criminal justice and corporate business* (Rome, 15 November) – Secretariat
- Meeting with Mr Robert GELLI, Minister of Justice, Monaco (Rome, 15 November) – Secretariat
- 13th European Healthcare Fraud & Corruption Network (EHFCN) international conference *Bytes without borders – preventing and countering healthcare fraud and corruption in the digital age* (Berlin, 18 November) – Secretariat

- Statement issued by the President of GRECO on the occasion of International Anti-corruption Day (9 December) – GRECO President
- Ecole nationale d'administration (ENA) *Training programme on fighting corruption* (Paris, 11 December) – Secretariat
- Meeting of the *Network of Corruption Prevention Authorities – Šibenik Network* (Tunis, 17-18 October)
- AFA (Agence française anticorruption) | ENM (Ecole nationale de la magistrature) five-day *professional training session Corruption: detection, prevention and suppression* (Paris, 21 November) – Secretariat

Council of Europe

- Consultations with NGOs present during the part-session of the Parliamentary Assembly (Strasbourg, 23 January) – Secretariat
- Annual meeting of Presidents of Monitoring and Advisory Bodies of the Council of Europe organised by the Secretary General (Strasbourg, 4 February) – GRECO President
- Conference organised in the framework of the Finnish Presidency of the Committee of Ministers of the Council of Europe *Protecting Common European Standards on the Rule of Law* (Tampere, 5 February) – David MEYER, Head of Delegation in GRECO, Bureau member (United Kingdom)
- *Study visit to the Council of Europe* – representatives of Scotland police, Scottish Government, Crown Office and Procurator Fiscal Service and Northern Ireland Department of Justice (Strasbourg, 28 February) – Secretariat
- Meeting with Morgens JENSEN, Deputy Leader of the Danish Social Democratic Party, Parliamentary Assembly of the Council of Europe Rapporteur on governance in sport (Paris, 5 March) – Secretariat
- Exchange of views with the *Parliamentary Assembly Monitoring Committee* (Paris, 6 March) – Secretariat
- 1339th meeting of the Ministers' Deputies – Directorate of Human Rights and Finnish Presidency of the Committee of Ministers side-event on the *Council of Europe Convention on Access to Official Documents – CETS 205* (Strasbourg, 6 March) – Secretariat
- Directorate of Communication *Training event for the media* (Venice, 13 March) – Secretariat
- Official visit to the European Court of Human Rights by His Royal Highness Crown Prince Haakon of Norway (Strasbourg, 18 March) – GRECO President
- Presentation by the Directorate of Internal Oversight of the Council of Europe – *Evaluation of the Council of Europe's support in the fight against corruption* (Strasbourg, 19 March) – participants in the 82nd GRECO Plenary Meeting
- Preparatory meeting on the *Dashboard Western Balkans: a better evaluation of the results of judiciary reform efforts* (European Union/Council of Europe Horizontal Facility for Western Balkans and Turkey phase II) (Brussels, 27 March) – Secretariat
- *Study visit to the Council of Europe* – Judges and Prosecutors from Serbia (Strasbourg, 24 April) – Secretariat
- Council of Europe advisory delegation to Armenia (Yerevan, 30-31 May) – Secretariat
- Exchange of views and presentation of GRECO's General Activity Report – 2018 to the Committee of Ministers (Strasbourg, 19 June) – GRECO President
- Press launch of GRECO's General Activity Report – 2018 (Brussels, 25 June) – GRECO President
- *Study visit to the Council of Europe* – Judges from Sweden (Strasbourg, 3 April and 4 September) – Secretariat
- *Study visit to the Council of Europe* – Federal Ethics Committee of the Belgian Parliament (Strasbourg, 28-29 October) – Philippe POIRIER, GRECO Evaluator (Luxembourg)
- Meeting with members of the Constitutional Law Committee of the Parliament of Finland (Strasbourg, 7 November) – Secretariat
- Action against economic crime in Albania (AEC-Albania) *Conference on fighting corruption and economic crime* (European Union/Council of Europe Horizontal Facility for Western Balkans and Turkey (Tirana, 12 November) – Secretariat)

Appendix 6 – GRECO Secretariat (2019)

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

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Heather ROSCOW SCHMITT, Personal assistant to the Executive Secretary and Head of Department
Björn JANSON, **Deputy executive secretary of GRECO**

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Penelope PREBENSEN
Marie-Rose PREVOST
Laure PINCEMAILLE

MEMBERSHIP

GRECO's membership comprises the 47 Council of Europe member States, Belarus, Kazakhstan and the United States of America and spans three continents.

Members (50) 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), Kazakhstan (1 January 2020).

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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.

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

COUNCIL OF EUROPE
CONSEIL DE L'EUROPE