

GROUP OF STATES AGAINST CORRUPTION (GRECO)

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

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Feature article:

**Journalists are defenceless
while corruption is armed**

Matthew, Andrew and Paul Caruana Galizia

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

18th General Activity Report (2017)



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

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Eighteenth General Activity Report (2017)

of the Group of States against
Corruption (GRECO)

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

Adopted by GRECO 79
(Strasbourg, 19-23 March 2018)

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French edition:
*18^e Rapport général d'activités (2017)
du Groupe d'États contre la Corruption*
www.coe.int/greco

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

This publication has not been copy-edited
by the SPDP Editorial Unit to correct typographical
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Cover photo: GRECO
© Council of Europe, April 2018
Printed at the Council of Europe

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FOREWORD

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

This year's Activity Report continues the path initiated in 2016. It provides an account of the "state of corruption" in Europe and the United States in 2017, highlighting the main trends drawn from GRECO's evaluations and recommendations, presenting examples of good practices, and showing the situation as regards the level of implementation by our member States of GRECO's recommendations.

As I mentioned in my 9 December statement, 2017 was a "dark year" for anti-corruption. Many allegations of corruption or actions against probity in public and private organisations have eroded people's trust in them. Judges have been dismissed or imprisoned and the independent and impartial work of many prosecutors has been undermined; election campaigns have been polluted by corruption allegations; and journalists covering corruption have been silenced, imprisoned or killed.

Budgetary constraints hit GRECO directly, with an impact on plenary meetings and reports adopted which, in the current circumstances, are likely to continue in 2018 and 2019. Overall, GRECO adopted some 50 evaluation and compliance reports in 2017. We have strengthened our ability to react in exceptional circumstances on an ad hoc basis, as and when situations arise, and have done so in respect of two countries. We have carried out pioneering, unplanned work to evaluate the integrity framework of a number of Council of Europe bodies – the Parliamentary Assembly and the Conference of INGOs, and soon the Congress of Local and Regional Authorities. We look forward to the full implementation of our recommendations by these bodies, and remain available to support any other Council of Europe body, including the European Court of Human Rights, in our area of expertise and within our resources.

Now, as GRECO's 4th Evaluation Round is coming to an end and the 5th round is starting, I wish to highlight three key trends I have observed in 2017.

First, is a tendency to over-rely on the repressive aspects of fighting corruption, too often underestimating the strength and effectiveness of preventive mechanisms. Yet, measures such as an effective asset declaration system, proper regulation of outside business activities, transparency about interactions with those seeking to influence the activities of public officials or elected representatives, help the latter fulfil their public service mandate with integrity.

Second, one in every five GRECO recommendations points to the need for supervision and enforcement of the legislative framework in place. This is a clear sign that the actual implementation of the existing rules and regulations is a concern area for each group under GRECO's review. Moreover, while the level of compliance with GRECO's recommendations remains sustained, it is slower than expected, with overall less than half of recommendations fully implemented.

Third, and perhaps most worryingly, in certain countries, new legislative initiatives have reversed reforms previously undertaken to comply with GRECO's recommendations. This led GRECO to reassess the new legislation or remind the authorities of the countries concerned of the relevant GRECO recommendations through ad hoc urgent evaluations.

Let there be no doubt; corruption is a very real, serious threat to our institutions and to the human fabric. It breaks down our democratic set up, undermines the rule of law, threatens the enjoyment of human rights, and damages economic growth and social development. The effective and full implementation of GRECO's recommendations is key to addressing these threats.

Attention has been paid to the importance of preventing and fighting corruption in many activities of the Council of Europe. The Parliamentary Assembly, Congress, the Human Rights Commissioner, the Venice Commission, the World Forum for Democracy, the Special Representative of the Secretary General on Migration and Refugees, the Consultative Council of European Judges (CCJE) – to mention but a few – have all dealt with anti-corruption issues in various ways and within their mandates, in 2017. GRECO and its Secretariat have been participating in and/or supporting this work making the best use of GRECO's evaluations. I welcome this development as a sign of mainstreaming GRECO's work across the Council of Europe. GRECO and its Secretariat has also engaged with a number of member countries wishing to understand better GRECO's expectations in relation to the recommendations issued to them. This is a development that I wish to support and encourage.

Let me compliment the Secretary General for planning on including GRECO's findings across his 2018 Report on the State of Democracy, Human Rights and the Rule of Law in Europe. I also wish to congratulate the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) for having identified a number of instances in which corruption issues are relevant in its work. We will seek to pursue and deepen GRECO's internal engagements within the Council of Europe in 2018.

A growing number of international institutions and organisations are making use of GRECO's reports and expertise. International IDEA and the OSCE are now observers in GRECO, and there have been mutually beneficial exchanges with the EBRD, the IMF, the G20 and the G7. GRECO has continued to attach great importance to ensuring cooperation and synergies with the other international anti-corruption monitoring bodies in the UN, OECD and OAS, within the boundaries of our respective statutory requirements. We have continued to coordinate meetings and evaluation dates, exchanged information, and organised together two side events on the occasion of the Conference of States Parties to the UN Convention against Corruption. The GRECO Secretariat hosted an inter-secretariat meeting with the UNODC, OECD and OAS in early January 2018.

I welcome the discussion in and the positive feedback from the EU's Article Thirty Six Committee on the long-standing issue of EU accession to GRECO. I wish to commend the Estonian Presidency for their efforts and call upon the Bulgarian Presidency of the EU to pursue them. We remain ready to discuss this issue with our EU colleagues at any time.

In 2017 the Committee of Ministers invited Tunisia to join GRECO as our 50th member State. The prospect of Tunisia joining our Group as our first North African member state is a very important development and is the culmination of the technical cooperation the Council of Europe has undertaken with Tunisia in the area of combating corruption. I hope that the requisite agreement on the privileges and immunities of the representatives of members of GRECO and members of evaluation teams can be concluded soon.

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. 22 questions, about a third of those in our 5th round evaluation questionnaire are gender-related. The responses from both Slovenia and the United Kingdom – the first two countries to be evaluated under this new round – were quite exhaustive. As a result, those first two evaluation reports include information about the breakdown of women and men among ministers, senior government officials and within police forces, and comment on whether the 40% threshold contained in Committee of Ministers Recommendation (2003)3 is met. We have also adopted our first gender-based recommendation.

GRECO has since its beginning included media, civil society and academia in its site visits as an important window on the activities of the Member being reviewed. Many members of the media and civil society organisations work tirelessly to expose corrupt and dishonest behaviours. I wish to pay tribute to the work of a fearless woman, Daphne Caruana Galizia: the Maltese journalist who was brutally murdered and whose investigations focused precisely on corruption issues. Her legacy and the work of other investigative journalists should be supported and encouraged as transparency is key to accountability. The feature article in this Report by Andrew, Matthew and Paul Caruana Galizia is a testament to the important work their mother and all the journalists in our member States carry out. I encourage you all to read it.

KEY FINDINGS

GRECO's activities in 2017 have been sustained in spite of some headwinds. Six evaluation reports, 40 compliance reports, one re-assessment report, and the evaluation reports of the integrity frameworks of the Parliamentary Assembly of the Council of Europe (PACE) and of the Conference of INGOs' were adopted in 2017. The decision by the Russian Federation to suspend payment of the outstanding balance of its 2017 budgetary contribution to the Council of Europe directly impacted GRECO's budget. Prudent budget management and additional voluntary financial contributions by other member States (Monaco, Slovak Republic) filled part of the gap and enabled GRECO to carry out most (but not all) of its work programme, postponing only a few compliance reports to 2018. In certain countries, new legislative initiatives reversed reforms previously undertaken to comply with GRECO's recommendations, or started reforms which may result in that country's serious violation of a Council of Europe anti-corruption standard, leading GRECO to either reassess the new legislation (Greece) or launch its new Rule 34 procedure for *ad hoc* evaluations in exceptional circumstances (Romania, Poland).

In 2017, allegations or confirmed cases of corruption have occurred in many countries and institutions.

Following the allegations of corruption and fostering of interests made against certain members or former members of PACE, its Committee on Rules of Procedures, Immunities and Institutional Affairs requested GRECO's expertise to assess the Code of Conduct of PACE members, notably as regards the enforcement system and the sanctions regime, as well as the rules relating to lobbying. GRECO adopted and published its assessment of PACE's integrity framework in June 2017¹. In the wake of PACE's request, the President of the Conference of INGOs also requested an appraisal by GRECO of the measures that could be taken by the Conference to reinforce its own provisions and better protect against risks of corruption and conflicts of interest. GRECO adopted and published the INGOs Conference assessment in October 2017². In both cases, GRECO issued comprehensive and precise recommendations to develop and/or strengthen, as the case may be, these institutions' integrity and ethic frameworks. Both PACE and the INGOs Conference have taken steps to address GRECO's recommendations. These rather unique GRECO evaluations are amongst the first of their kind at international level and signal the intention of the Council of Europe to continue leading by example in the anti-corruption area.

As the Fourth Evaluation Round is coming to an end³, the compliance process in this round was in full swing in 2017.

Through the adoption of its Fourth 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 Parliaments, judges and prosecutors. The key findings and conclusions of the Fourth Evaluation Round were presented and discussed at a Conference organised by the Czech Presidency of the Committee of Ministers in Prague on 9-10 November 2017 on "Lessons learned from GRECO's Fourth Evaluation Round"⁴. The findings below are largely based on the Study "Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors" (2017)⁵.

1. See GRECO's expertise on PACE's integrity framework: <http://rm.coe.int/assessment-of-the-code-of-conduct-for-members-of-the-parliamentary-ass/1680728008>
2. See <http://rm.coe.int/assessment-of-the-rules-controlling-risks-of-corruption-and-conflicts-/168075f9f2>
3. The Russian Federation 4th Evaluation Round report was adopted in October. Only Belarus, Liechtenstein, and San Marino remain to be evaluated under this round.
4. See Conference organised by the Czech Presidency of the Committee of Ministers in Prague on 9-10 November 2017 on "Lessons learned from GRECO's Fourth Evaluation Round": <http://www.coe.int/en/web/greco/greco-go-for-zero-corruption-prague-9-10-nov-2017>
5. See Study "Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors" (2017): <https://rm.coe.int/greco-fourth-evaluation-round-conclusions-and-trends/16807b8ae8>

Parliament is at the heart of democracy. And yet, members of parliament (MPs) received a higher overall number of recommendations in the Fourth Round than each of the other two groups. This is consistent with the credibility deficit of the political class, as continuously evidenced by public polls. At the same time, as *Figure 1a* shows, in the 26 member States concerned, they have been slow in implementing GRECO's recommendations. *Figures 1b and 1c* also show the areas targeted by GRECO's recommendations in respect of MPs in 46 member States (Belarus, Liechtenstein and San Marino have not yet been evaluated in the Fourth Round).

Figure 1a. Members of parliament – implementation of recommendations by GRECO member States⁶

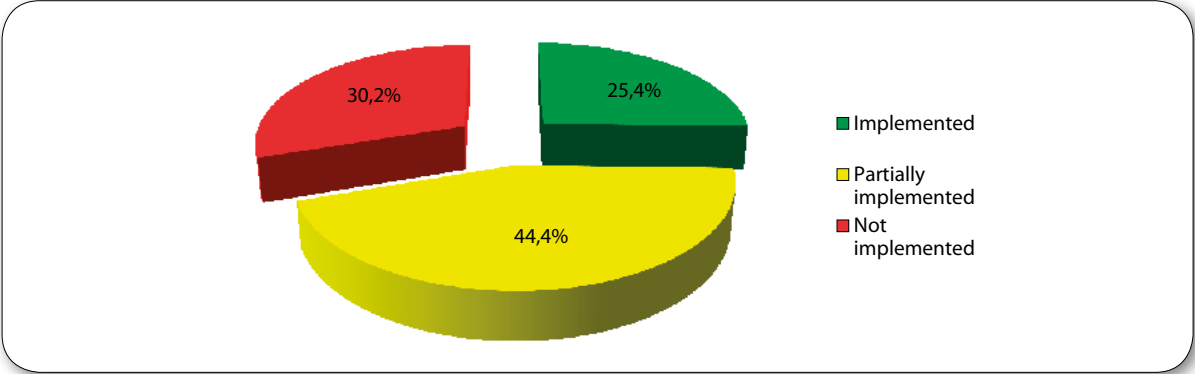


Figure 1b. Members of parliament – main areas targeted by recommendations

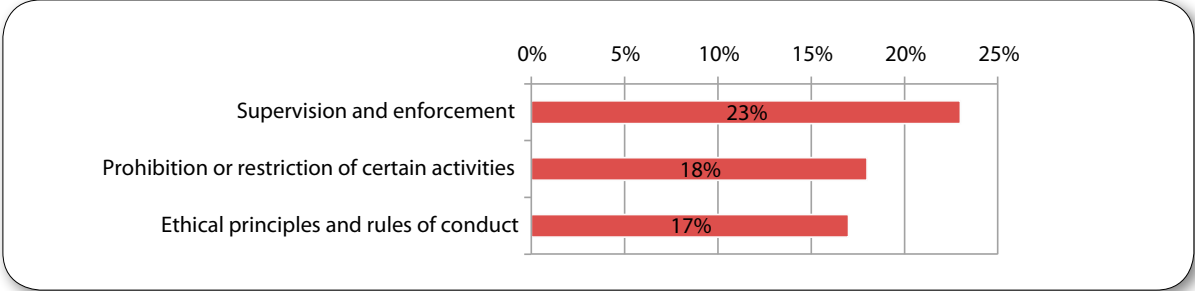
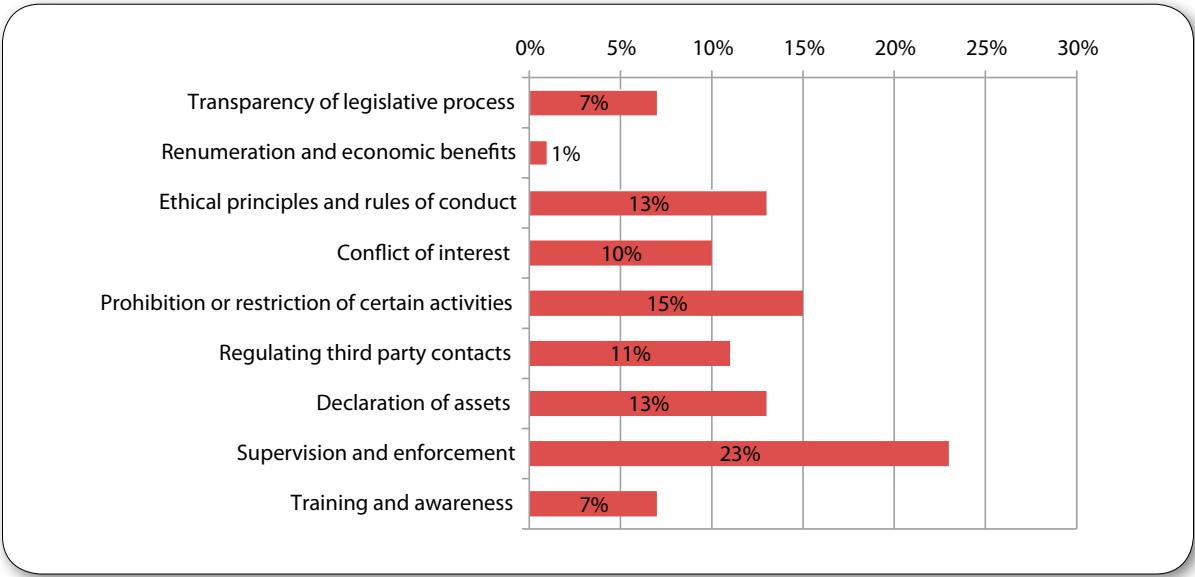


Figure 1c. Members of parliament – distribution of recommendations issued



6. Concerns 26 member States assessed since the beginning of the 4th Round compliance procedure and up to end 2017. Statistics are not available when, by end 2017, a member State had not authorised the publication of the compliance reports(s) or had not yet been subject to the 4th Round compliance procedure.

As representatives of the people, MPs are uniquely placed within the state to lead by example and demonstrate the standards expected of those in public service. GRECO's country-specific analyses and recommendations reinforce the fact that rules that support high standards of conduct – when actively developed, reviewed and maintained – are important tools and resources for MPs, and so is the requirement of transparency in public life. Regularising asset reporting, clarifying the restrictions on outside business activities, and ensuring MPs are open about their interactions with those seeking to influence legislative agendas or reforms, help them to fulfil their public service mandate with integrity. These measures also provide guidance to MPs on how to manage the potentially frequent conflicts of interest that can arise during their term in office. Clear standards of conduct help MPs and others understand what the expected conduct is and when that conduct falls below acceptable levels, as well as the consequences that can follow.

Selected good practices⁷

United States of America:

A holistic integrity framework for Congress

In so far as Members of Congress are concerned, in order to address inappropriate but non-criminal conduct, a developed system of rules on ethics and conduct has been adopted in the Senate as well as in the House of Representatives.

Each house has a code of conduct that covers such topics as gifts, partiality, conflicts of interest, use of official resources, relationship with lobbyists, outside activities, negotiating for employment after Congressional service and post-employment. There are also requirements for public financial disclosure and a system of confidential counselling and training. In so far as the enforcement of the rules is concerned, the Constitution makes each house responsible for the conduct of its Members and each has an ethics committee. Both ethics committees rely on nonpartisan, professional staff with expertise in ethics law and investigations. The House of Representatives in recent years created an additional entity to add another element of independence to the disciplinary process. The Office of Congressional Ethics, an independent and nonpartisan entity, which also relies on a professional staff consisting primarily of attorneys and other professionals with expertise in ethics law and investigations, is responsible for conducting preliminary investigations of complaints against Members and staff of the House of Representatives. The Office of Congressional Ethics makes recommendations to the House of Representatives ethics committee to either dismiss a matter or further review the allegations. The House of Representatives ethics committee then conducts its

own de novo review of the allegations and recommends appropriate actions to be taken by the Member or imposed by the full House of Representatives.

Furthermore, as a result of the existence of a large lobbying industry, the United States established, a long time ago, far reaching lobbying disclosure rules in respect of lobbyists' contacts with Members, their staffs and other public officials.

Finland:

Transparency of parliamentary committee work

Information on the composition of parliamentary committees is published on the website of Parliament. The meetings of parliamentary committees are as a rule not open to the public; however, a committee may open its meeting to the public during the time it is gathering information for the preparation of a matter. Minutes are kept of committee meetings, indicating the members present and the experts heard as well as the proposals and decisions taken, with voting results. Committee minutes are stored in an information network accessible to the public and preparatory documents concerning a matter become public when consideration of the matter by the committee has been concluded – unless the committee decides that for a compelling reason the documentation is to be kept secret, e.g. if divulging information would cause significant harm to Finland's international relations or to capital or financial markets. It is the general understanding that the possibility for a committee to decide to restrict public access to its documentation is to be used only exceptionally.

7. Other member States, such as the Russian Federation, may have similar good practices.

Judges are the public face of justice. It is to them that citizens and the State turn to interpret and apply the Law and to take binding legal decisions that can have a great impact on people’s lives. It is to judges that citizens turn to uphold the rule of law. But when judges do not live up to the high standards of integrity, independence and impartiality expected of them, trust falters, and public disquiet is palpable. The very foundations of a democratic State governed by the rule of law start to crumble as a result, and may eventually collapse. *Figure 2a* shows the level of compliance of 26 states with GRECO’s recommendations in respect of judges. *Figures 2b* and *2c* show the focus of recommendations issued under this category to 46 member States (Belarus, Liechtenstein and San Marino have not yet been evaluated in the Fourth Round).

Figure 2a. Judges – implementation of recommendations by GRECO member States⁸

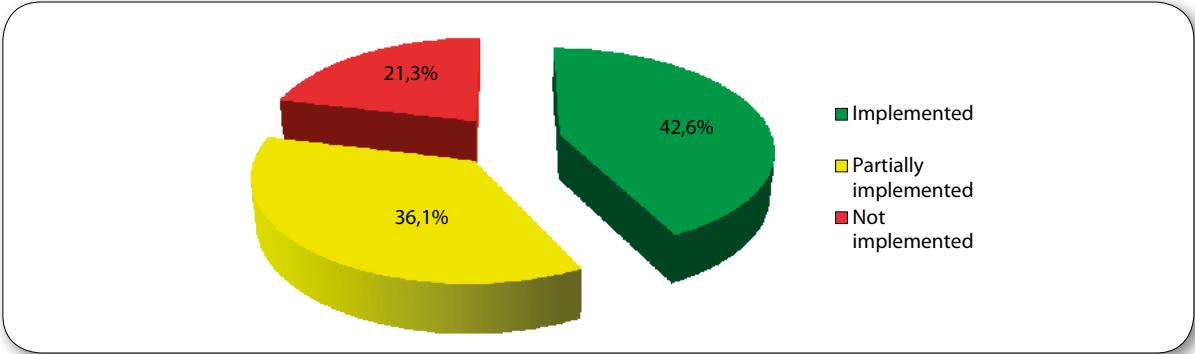


Figure 2b. Judges – main areas targeted by recommendations

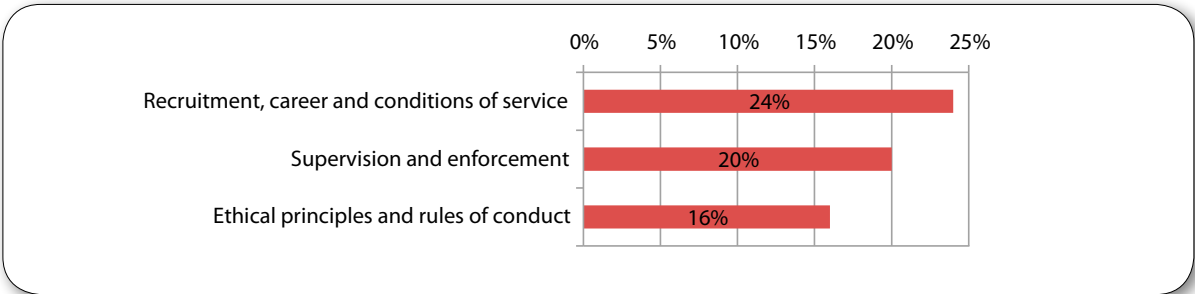
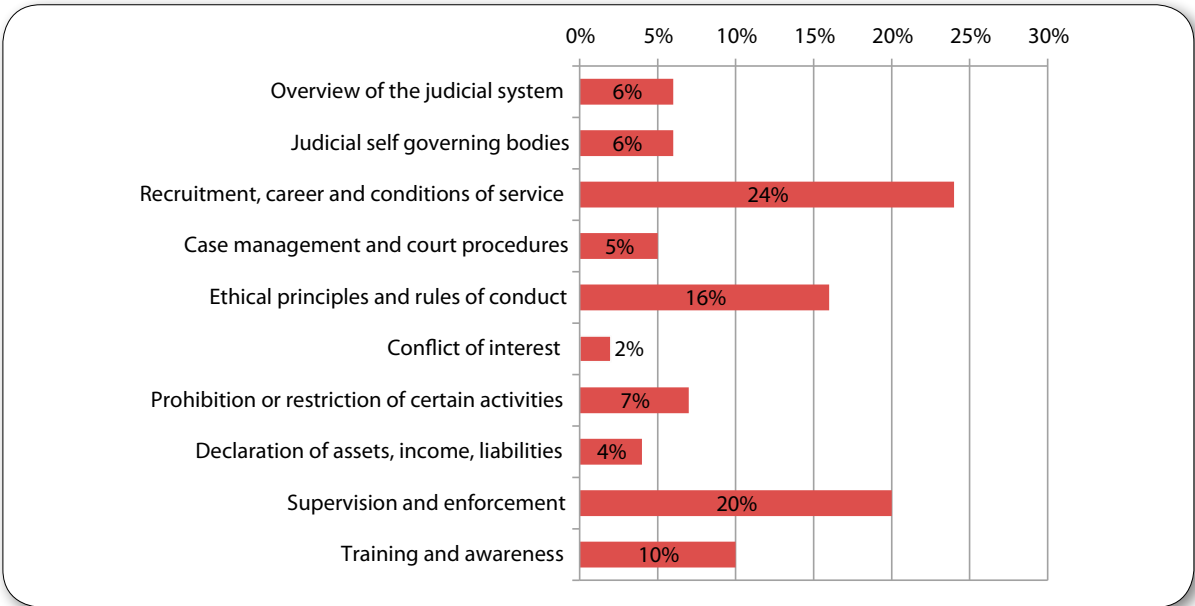


Figure 2c. Judges – distribution of recommendations issued



8. Concerns 26 member States assessed since the beginning of the 4th Round compliance procedure and up to end 2017. Statistics are not available when, by end 2017, a member State had not authorised the publication of the compliance reports(s) or had not yet been subject to the 4th Round compliance procedure.

A majority of countries received recommendations on the recruitment, transfer or promotion of judges and court presidents. Judicial positions need to be awarded on merit and GRECO made it clear that career progression and other conditions of employment, such as transfers between courts, must be managed both efficiently and fairly. This means that decisions should be taken on clear and objective, merit-based criteria. GRECO has also recommended (i) strengthening the role of the judiciary in the procedures for the recruitment, promotion and dismissal of judges, reducing the role of the head of state and requiring that written motivations for his/her decisions are given and, (ii) ensuring that any decisions in those procedures can be appealed to a court. Finally, GRECO has noted – not without some surprise – that it is still possible in a number of European countries to be at the same time a judge and an elected representative. GRECO has been firm in recommending in such cases, in light of the need to ensure a genuine separation of powers, that a restriction on the simultaneous holding of office as a judge and as a member of a national or local executive or legislative body is laid down in law. It is clear from GRECO recommendations that the aim must be to ensure that a code of conduct is a living document.

The vast majority of GRECO member States received recommendations on codes of conduct for judges. A third of these were to adopt such codes and the rest focused on their substance and implementation. GRECO insisted on the importance of active involvement of judges from all levels, in the development of a set of standards which should ideally be agreed upon following an open debate and discussion of their particular content.

Selected good practices⁹

United Kingdom:

Striving for excellence in diversity

The judiciary ranks as the most trusted institution by the public in the United Kingdom. For those operating in the judiciary system the rule of law presupposes the permanent presence of the three “I”-s: impartiality, independence and integrity. In the United Kingdom there is trust in this commitment, as well as credible efforts to engage in continuous reform demonstrating little or no passivity or self-indulgence in the system. This proactive attitude is illustrated, for example, regarding the search for satisfactory solutions to what is recognised as a persistent challenge in the judiciary, namely ensuring diversity so that no one is, or feels, excluded on the basis of gender or ethnicity from the judicial profession. Ensuring diversity also serves to better guarantee the independence of the judiciary so that the public do not perceive judges to be drawn predominantly from a specific group or class of society. In the last few years, the respective Lord Chancellors have encouraged efforts towards diversity in the gender and diversity of persons appointed. Discussion has been launched as to how the “diversity” and “merit” requirements would be accomplished in the current selection process. This is an on-going challenge for the UK’s judiciary.

Slovenia:

Case management allocation transparency

The Supreme Court of Slovenia is in charge of the computerisation of the judicial system and has introduced new technologies in the courts, to implement the rules on case assignment and on publicity, among others. Court registers are entirely computerised and publicly available. About 95% of cases are registered and allocated electronically. The annual schedules of all courts are published on the website of the judiciary. This positive feature of the system guarantees that no one can tamper with the random case assignment to judges. Computerisation has visibly increased public trust in the case allocation system - complaints from parties have almost completely ceased.

9. Other member States may have similar good practices.

Prosecution systems come in many shapes and forms across Europe. Some are part of the broader judiciary system, while others are closer to the executive branch. The different models of organisation of prosecution services posed an inherent difficulty to the evaluators under the Fourth Round. The emphasis was placed on assessing systems with regard to their capacity to act independently when performing investigation and on the use of internal and external safeguards against corruption. *Figure 3a* shows the level of compliance of 26 states with GRECO's recommendations in respect of prosecutors. *Figures 3b* and *3c* show the areas targeted by GRECO's recommendations in 46 member States (Belarus, Liechtenstein and San Marino have not yet been evaluated in the Fourth Round).

*Figure 3a. Prosecutors – implementation of recommendations by GRECO member States*¹⁰

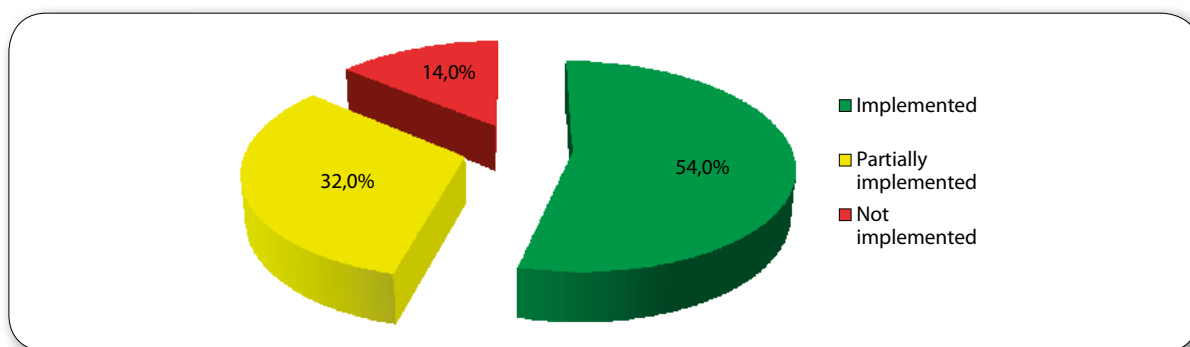


Figure 3b. Prosecutors – main areas targeted by recommendations

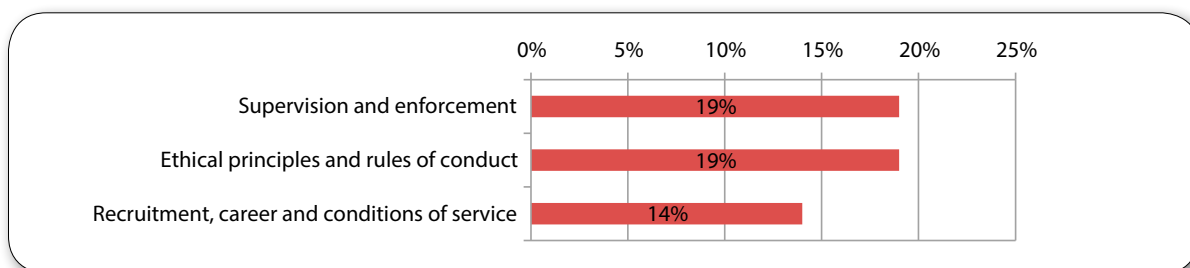
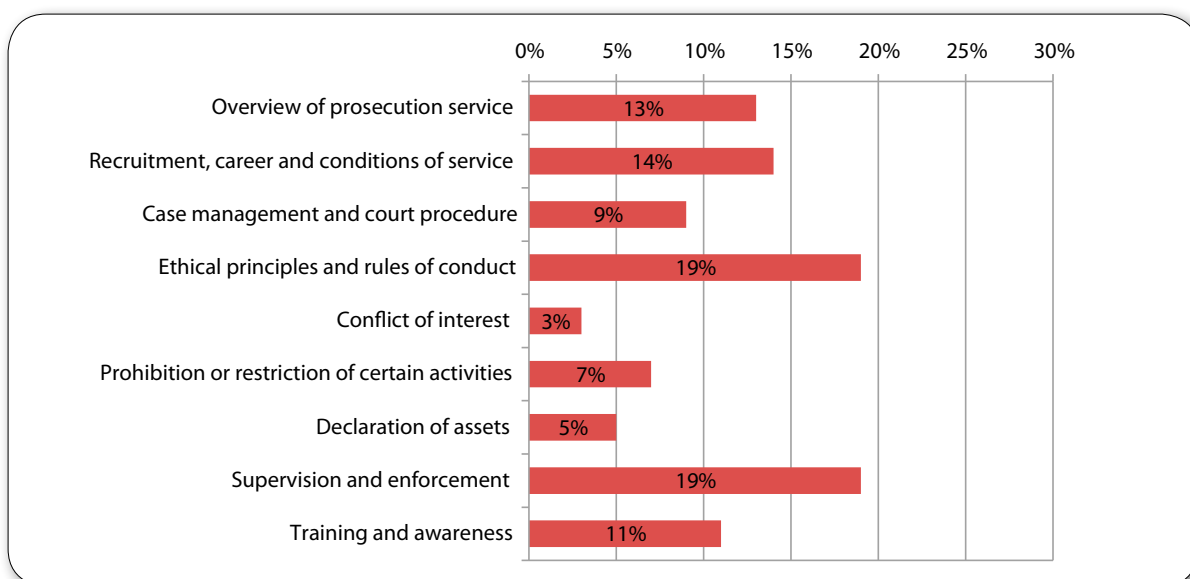


Figure 3c. Prosecutors – distribution of recommendations issued



10. Concerns 26 member States assessed since the beginning of the 4th Round compliance procedure and up to end 2017. Statistics are not available when, by end 2017, a member State had not authorised the publication of the compliance reports(s) or had not yet been subject to the 4th Round compliance procedure

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

Selected good practices¹¹

The Netherlands:

A novel approach for the prosecution service to communicate with the public

Each prosecution office now has a press team to handle communication on cases. The teams are composed of press officers and of “press prosecutors”. Press prosecutors divide their time between prosecution and media work. This innovation has been positively received. Much discontent with the prosecution service stemmed from a lack of understanding around decisions not to prosecute or to discontinue prosecution in individual cases. Press prosecutors with technical knowledge can discuss with the prosecutor in charge of a case why some detail should or should not be disclosed and are then able to speak to the media and answer questions more clearly and precisely.

Croatia:

Ethical Committee of prosecutors

The establishment of an Ethical Committee in the prosecution service of Croatia, which is given an advisory role in relation to adherence to and interpretation of the code of ethics of prosecutors, can certainly be considered as a step forward in fostering a climate of integrity within the profession. The Ethical Committee consists of the president and two members, appointed by the Extended Collegiate Body of the Public Prosecution Office. Its role is, on the one hand, to respond to prosecutors’ requests to interpret the ethical principles applicable to them, and, on the other hand, to issue opinions/recommendations regarding complaints against the behaviour considered by the submitter as contrary to the code. In practice, the Committee receives a broad range of questions from the prosecutors, e.g. on how to act outside court or the prosecution office in relation to a party in a case, on potential restrictions they should place on

their social contacts, on possible membership of clubs and associations etc., which proves their need for guidance in this field, especially in relation to potential incompatibilities and situations of conflict of interest. The approach of the Ethical Committee is an informal one, its opinions are not binding, and breaches of ethical rules are not addressed by this Committee. If a breach of the Code of Ethics is serious enough, it will be considered as a disciplinary offence and it will be up to the State Prosecutorial Council to sanction it.

France:

Effective anti-corruption bodies.

The French Anti-Corruption Agency (AFA),¹² established in 2017, is in charge of detecting and preventing actions that are contrary to probity. It acts under the authority of both the Minister of Justice and the Minister for Finance and Public Accounts. The Agency draws up the national plan for preventing corruption. It also monitors compliance by large companies with their duty of care in fighting corruption and influence peddling, and may sanction them in the event of violation.

The High Authority for transparency in public life (HATVP)¹³ aims at promoting the integrity of public life in France. Created 2014, the High Authority controls the integrity of the highest-ranking French public officials, who are required to disclose their assets and interests when taking up their official duties. The High Authority is also in charge of preventing conflicts of interest and monitoring “revolving doors” of certain public officials. The High Authority manages a public register of lobbyists, shared by governmental and local authorities and the Parliament, in order to provide citizens with information on the relations that interest representatives have with public officials when public decisions are made.

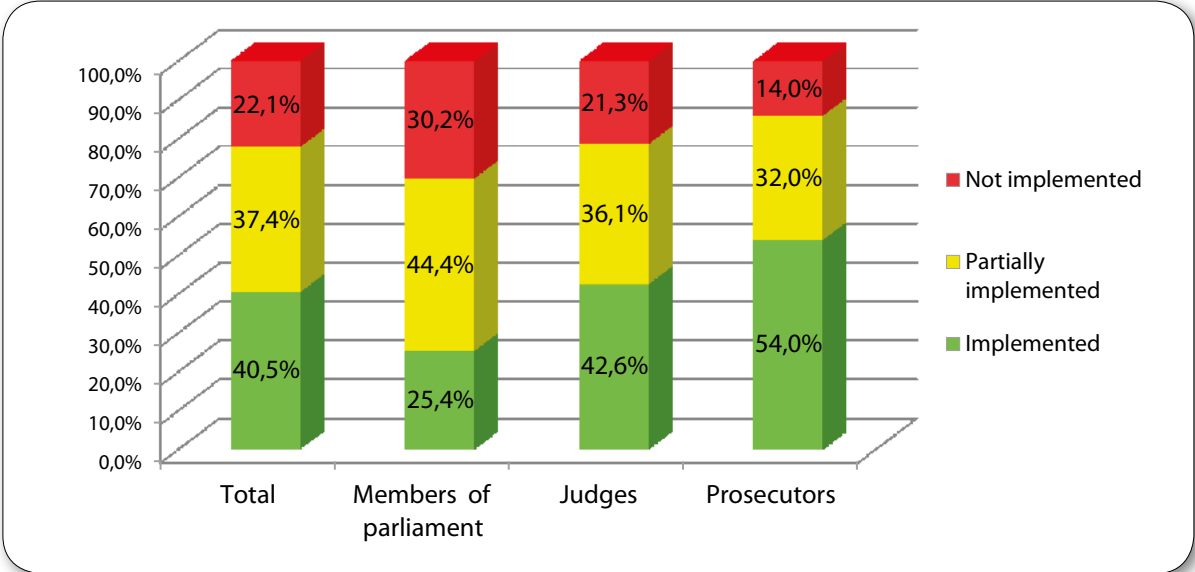
11. Other member States may have similar good practices.

12. <http://www.economie.gouv.fr/afa>

13. <http://www.hatvp.fr/>

The overall conclusion with respect to GRECO’s Fourth Evaluation Round is that while solid foundations have been laid in most jurisdictions to tackle corruption, including examples of good (even excellent) practices as reflected in this report, effective implementation remains slow. One in five recommendations refers to supervision and enforcement of the legislative framework in place. This is a clear sign that the actual implementation of the existing rules and regulations is a concern area for each group under GRECO’s review. Moreover, while the level of compliance with GRECO’s recommendations remains sustained, it is slower than expected. Less than half of the overall recommendations have been fully implemented by the 26 (of 49) member States whose compliance has been reviewed, with countries still in the process of making the necessary legal, institutional and practical changes needed to comply with them (figure 4).

Figure 4. Overall implementation of 4th Round recommendations by GRECO member States¹⁴



14. The 26 member States assessed in the 4th Round by end 2017, except those that had not authorised the publication of the pertinent compliance report(s) by that date.

SIGNIFICANT DEVELOPMENTS IN 2017

2017 saw the launch of GRECO's 5th Evaluation Round on "Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies". A High-Level launch event took place in March 2017 with the participation of prominent personalities and experts from across the world. In addition, a successful Training for Fifth Round Evaluators took place on 3-5 May 2017¹⁵. The hands-on practical Seminar included case studies and mock evaluations to enable participants to become familiar with GRECO evaluation procedures (and the requirements thereof) and the substance of the topics to be discussed during evaluation visits. Three Fifth Round evaluation visits took place in 2017 and two evaluation reports were adopted. It is too early to draw any conclusions from the Fifth Round evaluations at this stage. However, it is important to note that a gender dimension has been mainstreamed across the Fifth Round questionnaire and reports, with GRECO having adopted its first ever gender-based recommendation (Slovenia).

GRECO updated its Rules of Procedure in view of the new evaluation round. The new Rules increase the transparency and simplicity of the compliance process. They also enable GRECO to act in exceptional circumstances when it or the Executive Secretary receives reliable information from the Head of delegation of a GRECO member indicating that an institutional reform, legislative initiative or procedural change by that member may result in that member's serious violation of a Council of Europe anti-corruption standard which has been the subject of any GRECO evaluation round¹⁶. The same procedure applies if the information about a member is received by GRECO or the Executive Secretary from a Council of Europe body. As noted above, this Rule has been applied for the first time in respect of Romania and Poland.

It is to be welcomed that anti-corruption issues have been discussed in many parts of the Council of Europe. GRECO and/or its Secretariat actively contributed to this work. PACE adopted Recommendations 2105(2017) on "Promoting integrity in governance to tackle political corruption" and 2106(2017) on "Parliamentary scrutiny over corruption: parliamentary cooperation with the investigative media". Congress adopted a report on corruption in public procurement at local level and requested officially GRECO's expertise on its integrity framework (which GRECO will be discussing in 2018). The Human Rights Commissioner, in a third party intervention before the European Court of Human Rights,¹⁷ refers to GRECO's recommendations, among others. GRECO experts contributed to two opinions of the Venice Commission on the draft legislation on the anti-corruption court of Ukraine and on political financing in the Republic of Moldova. During the World Forum for Democracy, GRECO's Secretariat participated in a workshop: "Corruption and populism: can the international community help?" The Special Representative of the Secretary General on Migration and Refugees, Ambassador Tomáš Boček, has stated that "the flow of migration from Serbia to Hungary is managed through a waiting list which is compiled in an informal and non-transparent way, raising suspicion that corruption could be involved" and, in the case of Italy, that "questions about the legality of certain procurement processes could lead to opportunities for corruption by private operators who end up running the facilities and its services".¹⁸ The CPT identified a number of instances in which corruption-related issues are relevant to its work. GRECO's President made a keynote speech at the conference organised by the CCJE on the issue of "Judicial integrity and corruption" in November 2017, and held an exchange of views with the Venice Commission in December 2017.

15. See <https://www.coe.int/en/web/greco/greco-evaluators-training-seminar-strasbourg-3-5-may-2017>

16. See <http://rm.coe.int/rules-of-procedure-adopted-by-greco-at-its-1st-plenary-meeting-strasbo/168072bebd>

17. See <http://rm.coe.int/third-party-intervention-10-cases-v-turkey-on-freedom-of-expression-an/168075f48f>

18. See <http://www.coe.int/en/web/special-representative-secretary-general-migration-refugees/country-reports>

GRECO may reach 50 before it turns 20 ... On the eve of its 20th anniversary in 2019, GRECO may soon be adding one more state to its family: Tunisia. The Committee of Ministers on 8 November 2017 agreed to invite Tunisia to accede to GRECO. The accession will take effect once an agreement on the privileges and immunities of the representatives of members of GRECO and members of evaluation teams has been concluded and has entered into force, and upon receipt by the Secretary General of a notification of accession by Tunisia, pursuant to Article 4, paragraph 4, of the Statute of GRECO.

A growing number of international organisations and institutions are making use of GRECO's reports and expertise. The OSCE/ODIHR and International IDEA gained observer status in 2017. They join the UN (represented by UNODC), the OECD, the International Anti-Corruption Academy (IACA) and the Organisation of American States (OAS) in following GRECO's work. Professional associations are also working closely with and contributing to GRECO's work. Together with GRECO, these Organisations and partners are contributing to positive anticorruption reforms worldwide. This cooperation is translating into concrete joint initiatives, including:

- ▶ Two side events on (i) *Interests and Asset Disclosures by Public Officials: What works and what does not? – Latest insights from anti-corruption monitoring bodies* (Vienna, 8 November 2017) and (ii) *Enhancing the cooperation between the secretariats of international anti-corruption peer review mechanisms* (Vienna, 8-9 November 2017) organised by the UNODC, the OECD, the OAS and GRECO during the Seventh Session of the Conference of the States Parties to the United Nations Convention against Corruption (Vienna, 6-10 November 2017), open to all member States;
- ▶ Cooperation with the Study Commission of the International Association of Judges (IAJ-UIM) on Best Practices within the Judicial System for Ensuring Transparency and Integrity and Preventing Corruption (Lima, 22-24 February);
- ▶ Seminar co-organised with the OSCE/ODIHR on Reinforcing Accountability and Control of Party Funding – closing event of the meeting of the Political Finance and Political Corruption Research Committee of the International Political Science Committee (Valencia, 5 July 2017);
- ▶ Exchanges of information on topics of common interest between the OECD's Working Group on Bribery in International Business Transactions (WGB) and Working Party of Senior Public Integrity Officials (SPIO) and GRECO;
- ▶ GRECO Secretariat participation, together with the European Partial Agreement on Sport (EPAS), in the International Partnership against Corruption in Sport, with a particular focus on ensuring transparency and integrity in the selection of major sporting events making use of GRECO evaluation reports on the countries concerned (where available);
- ▶ GRECO evaluation and compliance reports can be used as a yardstick for countries in their efforts to achieve the Sustainable Development Goal 16, target 16.5 "Substantially reduce corruption and bribery in all their forms";
- ▶ Mutual exchanges with the G20 Anti-Corruption Working Group and the G7 anti-corruption work-stream under the respective German and Italian Presidencies.

There is growing recognition that corruption has a direct, detrimental effect on countries' economies. Corruption weakens the capacity of states to collect taxes, discourages investment and financial development, has direct social costs reflected in issues like poor education, health and social services. Against this background both the European Bank for Reconstruction and Development (EBRD) and the International Monetary Fund (IMF) have recognised and made extensive use of GRECO evaluation and compliance reports in their lending, surveillance and research work¹⁹.

A GRECO Study of national case-law relating to private sector corruption has been prepared by the Head of the Estonian delegation (Ms Mari-Liis Sööt) with the GRECO Secretariat²⁰. The Study highlights some of the challenges faced at national level to investigate and prosecute corruption occurring in the private sphere. These include misuse of legal entities and use of jurisdictions where mutual legal assistance may prove difficult or impossible; the element of "business activity" has been understood in some jurisdictions as not covering non-profit sectors, such as sports; a formalistic view of the notion of breach of duties; fewer reports on private sector bribery than on public sector bribery.

19. See, for instance the Regional Economic Outlook (REO) of the IMF on November 2017. <http://www.imf.org/en/Publications/REO/EU/Issues/2017/11/06/Eurreo1117>

20. See Study of national case-law relating to private sector corruption: <https://rm.coe.int/summary-analysis-of-selected-private-sector-bribery-cases-by-sophie-me/16807720a4>

Some movement has been noted on the issue of EU accession to GRECO. The EU Committee Article Thirty Six (CATS) discussed this issue in November 2017. Earlier in the year, in May 2017, the European Parliament issued a Resolution calling “for the EU to advance its application for membership of the Council of Europe Group of States against Corruption (GRECO) as soon as possible and for Parliament to be kept up to date with the progress of this application”.²¹ In addition, references to GRECO’s reports and recommendations are made in the EU’s Cooperation and Verification Mechanism on Romania and Bulgaria.²²

GRECO’s media presence is sustained and growing.²³ 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. Given the refusal by Belarus to publish its reports, GRECO has however published its summary conclusions.

21. See https://www.coe.int/en/web/greco/home/newsroom/-/asset_publisher/yxhkEPo3SNnS/content/european-parliament-session-and-greco

22. See https://ec.europa.eu/info/strategy/justice-and-fundamental-rights/effective-justice/rule-law/assistance-bulgaria-and-romania-under-cvm/cooperation-and-verification-mechanism-bulgaria-and-romania_en

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

2017 – A NEW EVALUATION ROUND

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 the 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-up²⁴, 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.²⁵ 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.

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

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

FEATURE ARTICLE

Journalists are defenceless while corruption is armed

Matthew, Andrew and Paul Caruana Galizia

The Panama Papers reporting coordinated by the International Consortium of Investigative Journalists triggered hundreds of judicial proceedings across the world, high profile political resignations, \$500 billion collected in lost tax revenue, and broad public debate on strengthening anti-money laundering rules and blacklisting tax havens.

Such is the impact of investigative journalism on corruption. But this impact varies predictably by country and unpredictably over time.

Investigative journalists can only expose corruption. They have no prosecutorial powers and no formal role in state institutions. Their work can have immediate consequences on the corrupt where press freedoms are strong and law enforcement authorities are independent from central governments and private interests.

But in countries where there's no will or capacity to prosecute the corrupt figures they expose, journalists often become the targets themselves. The state's full force is brought down not on the corrupt, but on the journalists and whistleblowers who bring their corruption to light.

When the first Panama Papers reports broke in some countries, banks were raided, assets seized, Prime Ministers forced out and corrupt careers ended. In another group of countries, journalists working on the Panama Papers were hit with vexatious lawsuits, financial threats, targeted tax investigations, and physical harassment. The journalists who sought to expose corrupt business people and their political allies were instead subject to vicious reprisals.

Some of those journalists are likely to be murdered: since 1992 two thirds of all murdered journalists were covering politics and corruption.

This statistic shows us that a journalist is murdered when institutions fail to investigate corruption, when they fail to prosecute it, and when they fail to deter it in the first place. The murder of journalists betrays institutional failure and extreme levels of corruption.

Investigative journalists working on the Panama Papers and the later Paradise Papers showed us that the offshore system *is* the system. Shell companies are used to evade billions in tax and launder billions from the proceeds of crime and corruption. The network is global, with its own international service providers and its own client states.

The unpaid taxes and proceeds of crime and corruption are funnelled into legitimate businesses, giving unethical companies an unassailable market position, perverting our economies and reshaping our landscapes, with skyscrapers and tower blocks built as vehicles to launder money.

The dark world the Panama Papers exposed would never have come to light had it not been for a chance leak enabled by a chance security oversight at a global law firm that was, under our own noses, operating as a criminal organisation. It was one momentary weakness in one organisation at one point in time, seized upon by a group of committed journalists.

There are countless other organisations that could serve as a window into other criminal worlds. But we can't rely on the randomness of leaks and the courage of whistleblowers and journalists. The results are too unpredictable and the task too dangerous.

The success of Panama Papers speaks both to the success of investigative journalism and the inadequacy of our laws and regulations, our public prosecutors and law enforcement authorities. The best investigative journalism shows up inadequacies. The rest of the work – correcting them – is up to the rest of us.

The reaction to the Panama Papers reporting also showed us that the anonymous owners of those shell companies are prepared to defend their interests with ruthless force. They sue individual journalists and their employers, suppressing press freedom and denying us our right to know, to speak, to learn. They lobby politicians relentlessly, skewing policies away from the needs of the many to those of the wealthy, the criminal, and the corrupt. Consequently, our democracy mutates to serve their individual interests rather than our collective needs.

Weaker democracies look to Europe for guidance in their fight against corruption. But in reality, while many European democracies have the will and capacity to fight corruption, some still don't and some more are slipping at an alarming pace. As our global standard bearers falter, standards drop for everyone. And the work of investigative journalists in weaker democracies becomes more dangerous and more important and its impact less predictable.

Investigative journalists will keep on exposing corruption because that's their job. Ours is to ensure impact; to take what they've shown us and use it to strengthen our institutions and democracies, and to see that the criminal and corrupt see justice.

WORKING FRAMEWORK

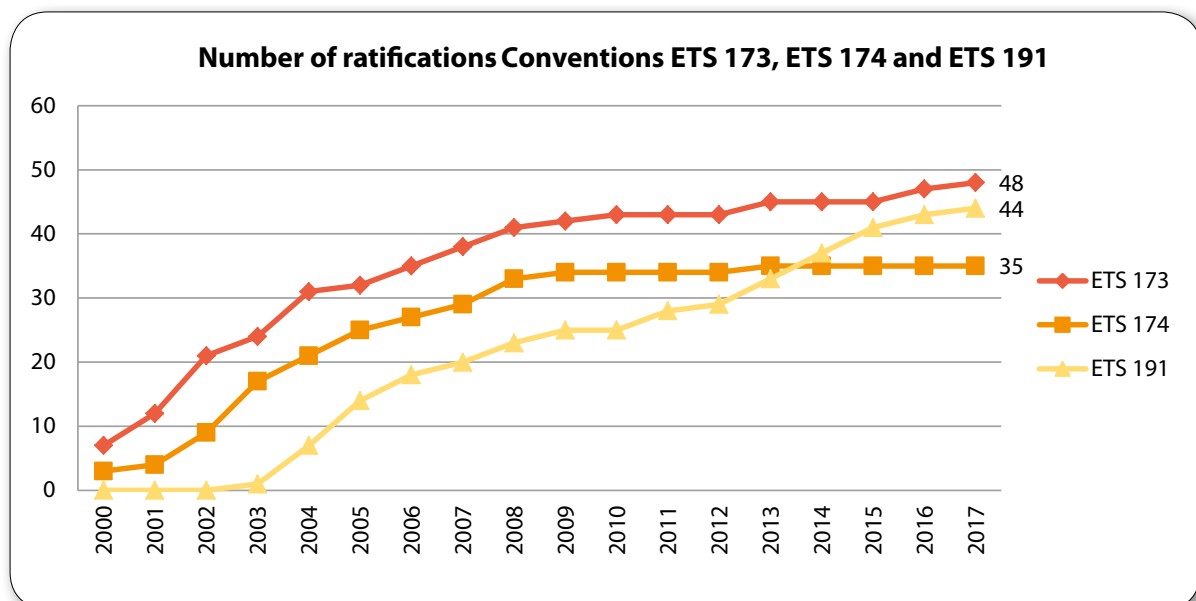
Anti-corruption standards of the Council of Europe

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. In 2017, Germany ratified the Criminal Law Convention on Corruption (ETS 173) and the Additional Protocol to the Criminal Law Convention (ETS 191), while the Czech Republic signed the Additional Protocol and launched the ratification process. While it is welcomed that the Criminal Law Convention and its Protocol are widely ratified, it is regrettable that 12 Council of Europe member States have not yet ratified the Civil Law Convention on Corruption despite its importance for the public, private (business) and not-for-profit sectors. 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 (3), even though corruption and integrity cases affecting sports events, and competition-related business more generally, have never been so numerous and prominent in the public sphere.

Council of Europe Treaty Office: www.conventions.coe.int



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)

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

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

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.

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 duration of the 5th Evaluation Round were taken up, on 1 January 2017, by Marin MRČELA, Vice-President of the Supreme Court of Croatia and Agnes MAITREPIERRE, *Chargée de Mission*, Directorate of Legal Affairs, Ministry for Europe and Foreign Affairs of France, respectively. The Bureau is composed of the President, Vice-President, and Helena LIŠUCHOVÁ, Director, International Cooperation and EU Department, Ministry of Justice of the Czech Republic; Aslan YUSUFOV, Deputy Head of Directorate, Head of Section of supervision over implementation of anti-corruption legislation, Office of the Prosecutor General of the Russian Federation; Vita HABJAN BARBORIČ, Head of the Centre for Prevention and Integrity of Public Service, Commission for the Prevention of Corruption of Slovenia; Ernst GNAEGI, Head of the International Criminal Law Unit, Federal Ministry of Justice of Switzerland; and David MEYER, Head of International Relations, Law, Rights and International Directorate, Ministry of Justice of the United Kingdom.

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

Statutory Committee – Budget and Programme of Activities

The Statutory Committee is composed of the Permanent Representatives of all Council of Europe member States (the Committee of Ministers) and representatives of the two GRECO member States that are not members of the Organisation (Belarus and the United States of America). Its principle task is to adopt GRECO's programme and budget which is prepared in line with the biennial method implemented throughout the Organisation and based on priorities presented by the Secretary General. The Statutory Committee, chaired in 2017 by Miroslav PAPA, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of Croatia to the Council of Europe, approved GRECO's biennial programme 2018-2019 and budget for 2018.

Secretariat

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



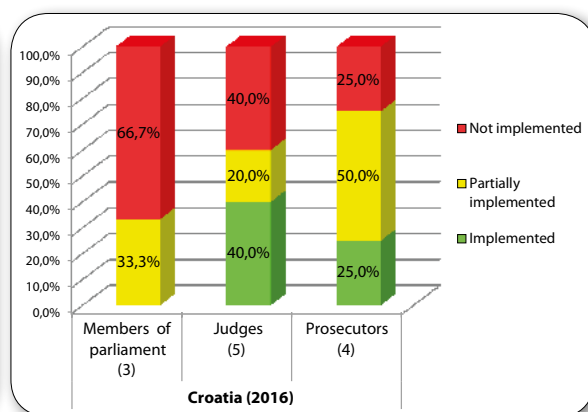
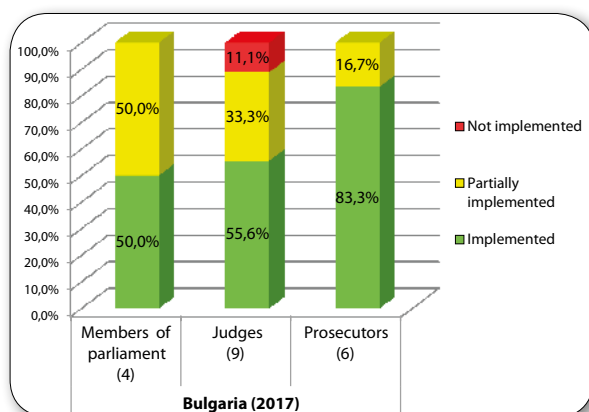
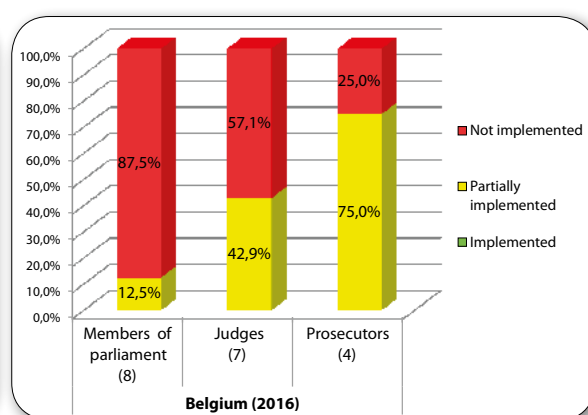
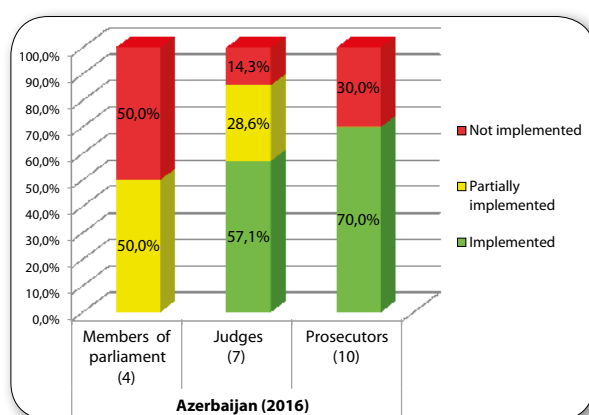
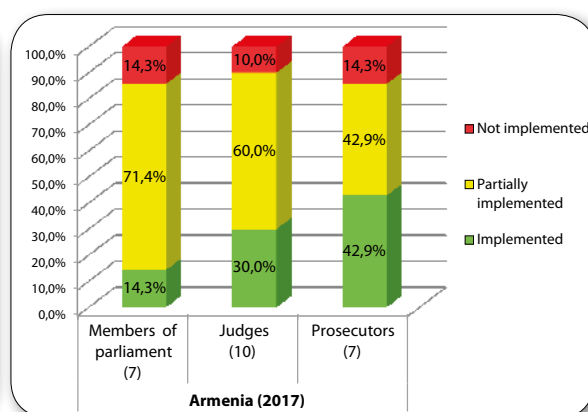
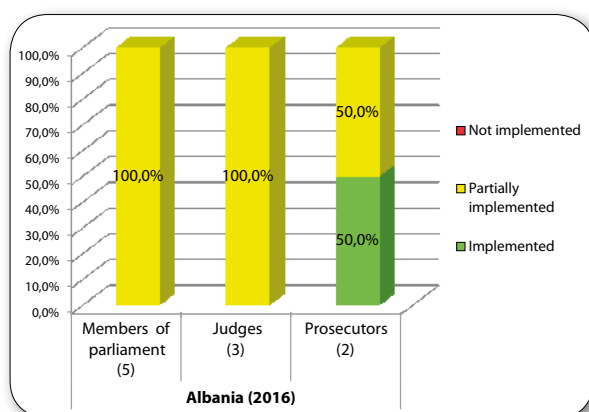
APPENDICES

Appendix 1 – GRECO’s mission

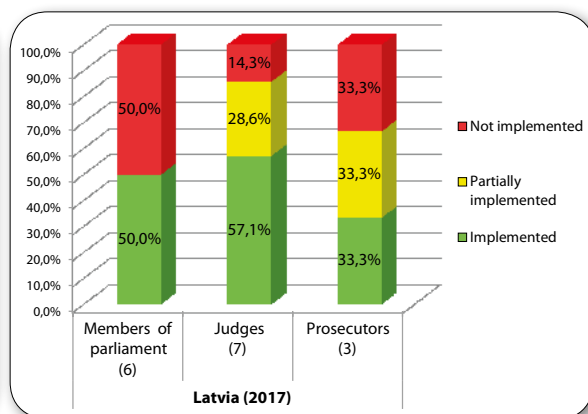
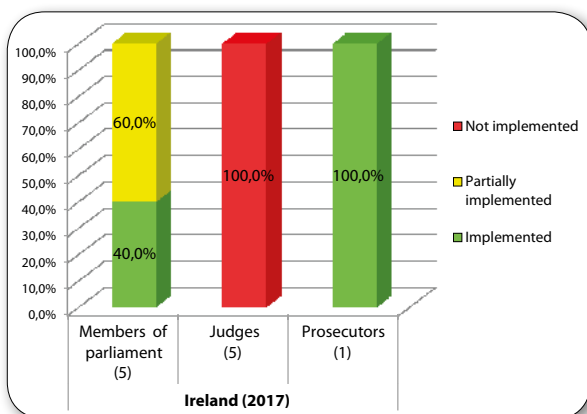
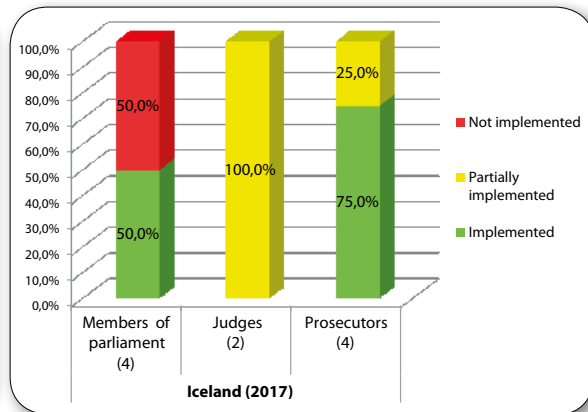
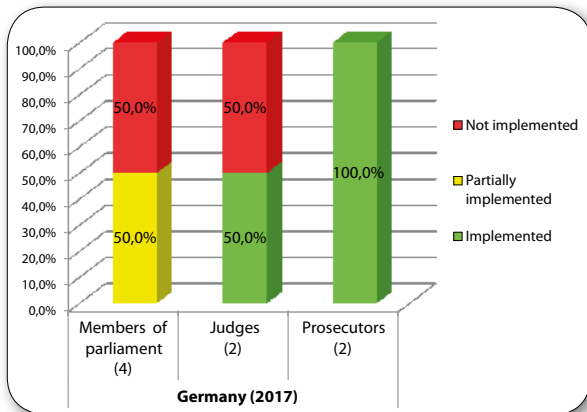
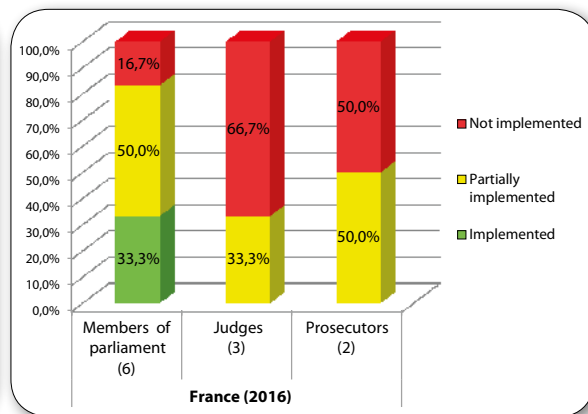
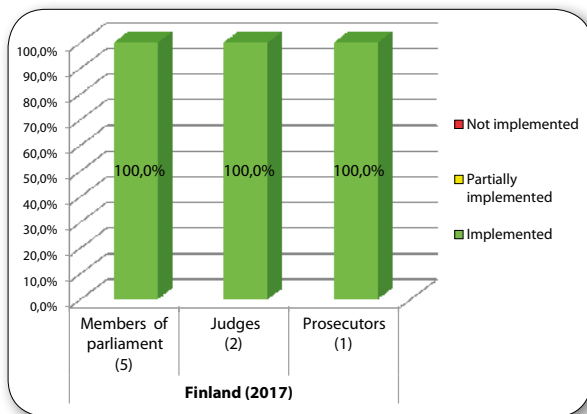
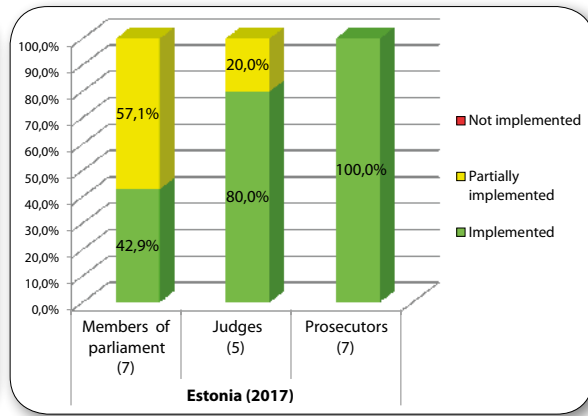
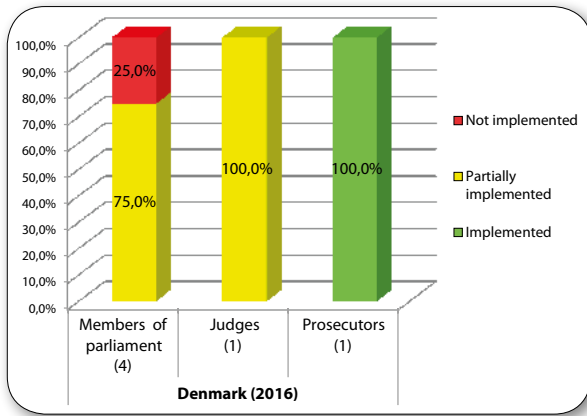
The anti-corruption monitoring body of the Council of Europe has been operational since 1999. It was established as the result of the strong political will of Council of Europe member States to take decisive and enduring measures to counter corruption by ensuring adherence to and effective implementation 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.

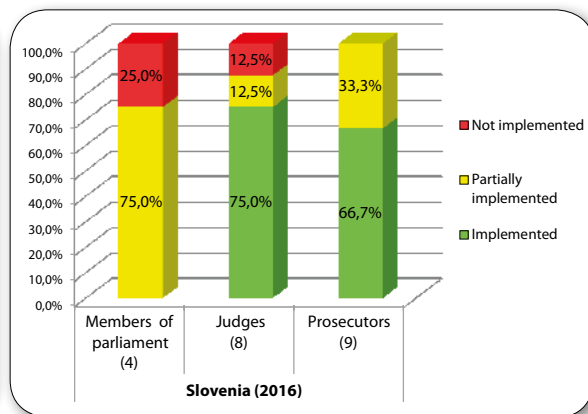
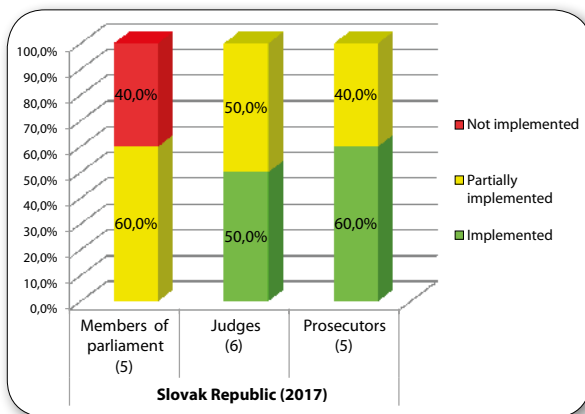
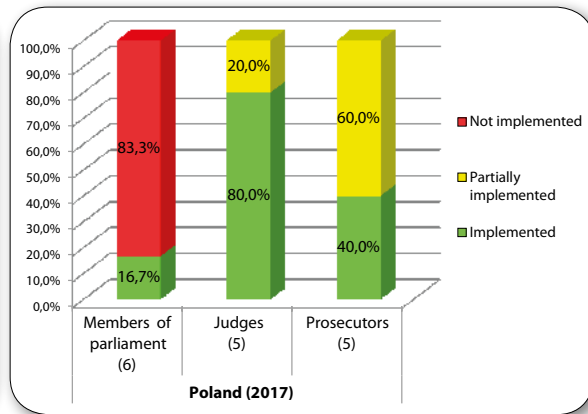
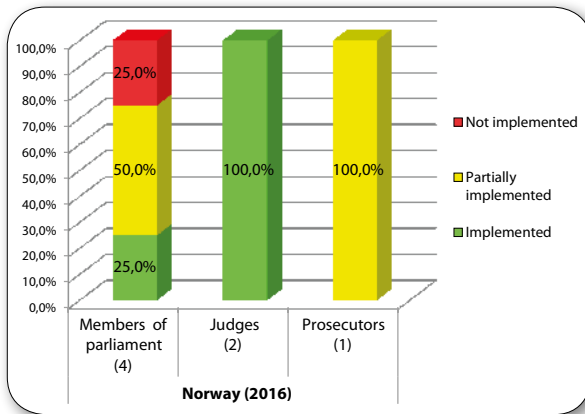
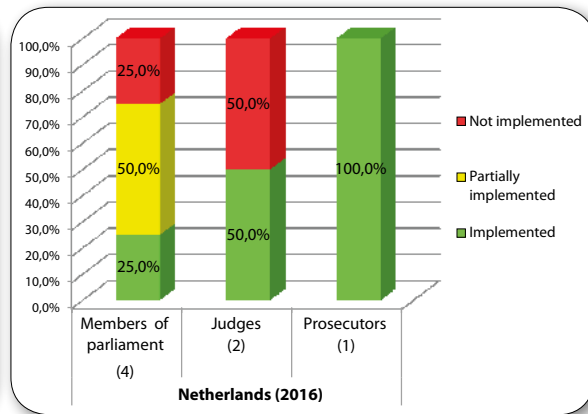
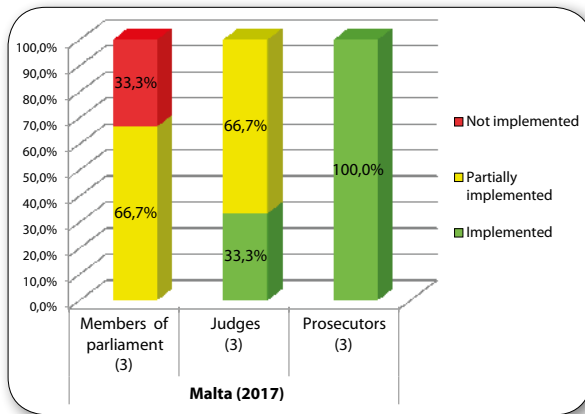
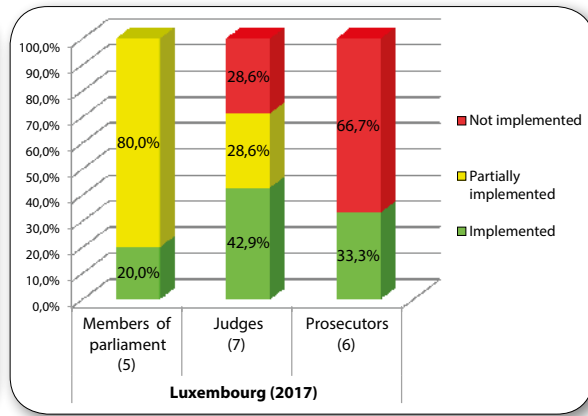
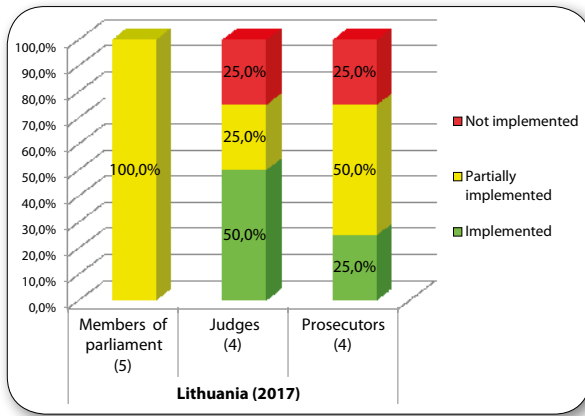
The clear stated political objective of strengthening the capacity of member States to prevent and fight corruption is served by a monitoring model designed to provide each member State with a detailed analysis and set of recommendations that are tailored to the specific architecture of each country.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

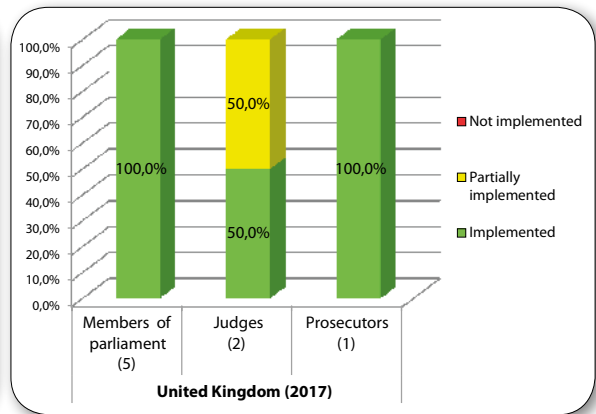
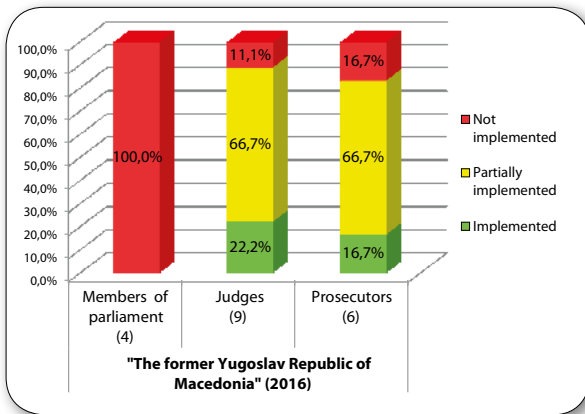
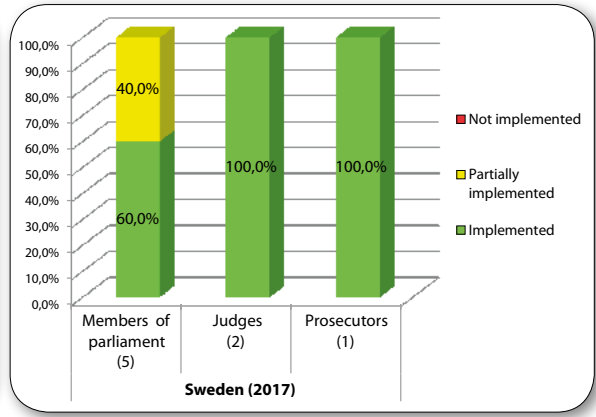
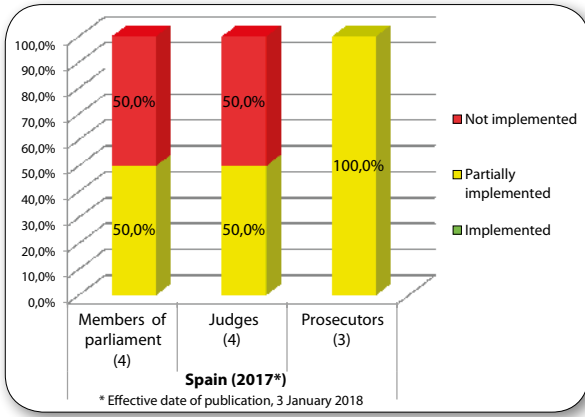
Appendix 2 – 4th Round Implementation Statistics²⁶



26. This appendix covers 26 member States assessed in the 4th Round by end 2017. Statistics are not available when, by end 2017, a member State had not authorised the publication of the compliance report(s) or had not yet been subject to the 4th Round compliance procedure. The numbers in brackets refer to the number of recommendations issued under each category.







Appendix 3 – Core Programme

On-site evaluation visits in 2017

4th Evaluation Round

- ▶ Russian Federation (28-31 March 2017)

5th Evaluation Round

- ▶ Slovenia (26-30 June 2017)
- ▶ United Kingdom (26-30 June 2017)
- ▶ Finland (18-22 September 2017)
- ▶ Iceland (2-6 October 2017)
- ▶ Luxembourg (13-17 November 2017)
- ▶ Latvia (11-15 December 2017)

Other

- ▶ Parliamentary Assembly of the Council of Europe
- ▶ Conference of INGOs of the Council of Europe

Meetings 2017

GRECO Plenary

- ▶ GRECO 75 (20-24 March 2017)
and exchange of views with: Giovanni KESSLER, Director-General, European Anti-Fraud Office (OLAF), European Commission
- ▶ GRECO 76 (19-23 June 2017)
and exchanges of views with: a delegation from Tunisia; Patrick MOULETTE, Head of the Anti-Corruption Division, OECD
- ▶ GRECO 77 (16-18 October 2017)
and exchanges of views with: His Excellency Mr Robert FICO, Prime Minister of the Slovak Republic ; representatives of the German co-chairmanship of the G20 Anti-corruption Working Group (ACWG) and the Italian Presidency of the G7
- ▶ GRECO 78 (4-8 December 2017)
and exchange of views with: Janos BERTOK, Head of Division, Public Governance Directorate, OECD

GRECO Bureau

- ▶ Bureau 79 (24 February 2017)
- ▶ Bureau 80 (19 May 2017)
- ▶ Bureau 81 (21 September 2017)
- ▶ Bureau 82 (8 November 2017)

Conferences

- ▶ High-level official launch of GRECO's 5th Evaluation Round (20 March 2017)
- ▶ Go for Zero Corruption – Conference on Lessons learned from GRECO's Fourth Evaluation Round, organised by the Czech Presidency of the Committee of Ministers (9-10 November 2017)

Training workshops

- ▶ Training of Evaluators for the 5th Evaluation Round (3-5 May 2017)

GRECO Statutory Committee

- ▶ 22nd Meeting – Adoption Programme and Budget 2018 (29 November 2017)

Evaluation reports adopted in 2017

4th Evaluation Round

- ▶ Andorra
- ▶ Monaco
- ▶ Russian Federation
- ▶ Ukraine

5th Evaluation Round

- ▶ Slovenia
- ▶ United Kingdom

Other

- ▶ Expertise addressed to the Parliamentary Assembly of the Council of Europe
- ▶ Expertise addressed to the Conference of INGOs of the Council of Europe

Compliance reports adopted in 2017

4th Evaluation Round compliance procedure

- ▶ Armenia, Bulgaria, Germany, Greece, Iceland, Lithuania, Malta, Montenegro, Poland, Slovakia – procedures on-going
- ▶ Estonia, Finland, Sweden, United Kingdom – procedures closed

*Globally unsatisfactory: non-compliance procedure*²⁷

- ▶ Hungary, Ireland, Luxembourg, Portugal, Romania, Serbia, Turkey – procedures opened
- ▶ Spain – procedure maintained
- ▶ Latvia – procedure closed

3rd Evaluation Round compliance procedure

- ▶ Belgium, Germany, Sweden – procedures on-going
- ▶ Andorra, Azerbaijan, France, Hungary, Malta, Monaco, Romania, Ukraine, United States of America – procedures closed
- ▶ Reassessment (Recommendation ii(i) on Transparency of Party Funding) Greece – procedure closed

Globally unsatisfactory: non-compliance procedure

- ▶ Switzerland – procedure maintained
- ▶ Bosnia and Herzegovina, Turkey – procedures closed

Joint 1st and 2nd Round Evaluations

- ▶ Liechtenstein – procedure closed

Globally unsatisfactory: non-compliance procedure

- ▶ Belarus – procedure maintained

Studies finalised in 2017

- ▶ Study “Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors” (2017)
- ▶ Study of national case-law relating to private sector corruption (2017)

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

Appendix 4 – GRECO Delegations (at 31/12/2017)

ALBANIA / ALBANIE

Ms Teuta VODO (Head of delegation)
Vice Minister of Justice

ANDORRA / ANDORRE

Mme Patricia QUILLACQ (Chef de délégation)
Ministère des Affaires Sociales, de la Justice et de l'Intérieur

Mme Cristina NOBRE MADUREIRA
Ministère des Affaires Sociales, de la Justice et de l'Intérieur

ARMENIA / ARMENIE

Mr Arthur OSIKYAN (Head of delegation)
Ministry of Justice

Mr Karen GEVORGYAN
Faculty of Law

Substitut/e
Ms Anna MARGARYAN
Faculty of Law

AUSTRIA / AUTRICHE

Mr Christian MANQUET (Head of delegation)
Ministry of Justice

Ms Dascha ULJANOV
Ministry of Justice

Substitut/e
Ms Martina KOGER
Ministry of the Interior

Substitut/e
Ms Verena WESSELY
Ministry of the Interior

AZERBAIJAN / AZERBAIDJAN

Mr Vusal HUSEYNOV (Head of delegation)
Parliament

Mr Kamran ALIYEV
General Prosecutor's Office

Substitut/e
Mr Kamal JAFAROV
Commission on Combatting Corruption

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

BELARUS

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

Mr Pavel SASCHEKO
General Prosecutor's Office

Substitut/e
Ms Hanna KARABELNIKAVA
General Prosecutor's Office

Substitut/e
Mr Igor SEVRUK
General Prosecutor's Office

BELGIUM / BELGIQUE

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

M. Marc VAN DER HULST
Parlement fédéral

Substitut/e
M. Carl PIRON
Service Public Fédéral Justice

Substitut/e
Mme Ria MORTIER
Conseil supérieur de la Justice

BOSNIA AND HERZEGOVINA / BOSNIE-HERZEGOVINE

Mr Samir RIZVO (Head of delegation)
Ministry for International Relation and European
Integration

Mr Adnan DLAKIĆ
Ministry of Security

BULGARIA / BULGARIE

Mr Georgi RUPCHEV (Head of delegation)
Ministry of Justice

Mr Petar PETKOV
Supreme Prosecutor's Office
Substitut/e
Mr Florian FLOROV
Ministry of Justice

CROATIA / CROATIE

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

Substitut/e
Mr Davor DUBRAVICA
Regional Anti-Corruption Initiative for South Eastern
Europe

Mr Dražen JELENIĆ (Head of delegation)
Deputy State Attorney General

Substitut/e
Mr Kršimir SIKAVICA
Ministry of the Interior

CYPRUS / CHYPRE

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

Substitut/e
Ms Natia KARAYIANNI
Parliament

Ms Rena PAPAETI-HADJICOSTA
Office of the Attorney General

Substitut/e
Ms Theodora PIPERI
Office of the Attorney General

CZECH REPUBLIC / REPUBLIQUE TCHEQUE

Ms Helena LIŠUCHOVÁ (Head of delegation)
**Bureau Member / Membre du Bureau –
Gender Rapporteur**
Ministry of Justice

Ms Lenka HABRNÁLOVÁ
Ministry of Justice

Substitut/e
Ms Markéta BRABCOVÁ
Ministry of Justice

DENMARK / DANEMARK

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

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

Mr Martin STASSEN
State Prosecutor for Serious Economic and International
Crime

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

ESTONIA / ESTONIE

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

Ms Kätlin-Chris KRUUSMAA
Ministry of Justice

Substitut/e
Mr Tanel KALMET
Ministry of Justice

FINLAND / FINLANDE

Ms Catharina GROOP (Head of delegation)
Ministry of Justice

Substitut/e
Mr Juuso OILINKI
Ministry of Justice

Mr Jouko HUHTAMÄKI
Ministry of the Interior

FRANCE

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

Mme Agnès MAITREPIERRE (Chef de délégation)
Vice-President of GRECO / Vice-présidente du GRECO
Ministère de l’Europe et des Affaires étrangères

Substitut/e
Mme Noémie DAVODY
Ministère de la justice

M. Renaud JAUNE
Agence française anticorruption (AFA)

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

GEORGIA / GEORGIE

Mr Zurab SANIKIDZE (Head of delegation)
Ministry of Justice

Substitut/e
Ms Mariam MAISURADZE
Ministry of Justice

Substitut/e
Ms Gulisa KAKHNIASHVILI
Ministry of Justice

GERMANY / ALLEMAGNE

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

Substitut/e
Mr Frank BÖHME
Ministry of Justice and Consumer Protection

Ms Silvia SPÄTH
Ministry of the Interior

Substitut/e
Mr David AYDINTAN
Administration of the *Bundestag*

GREECE / GRECE

Ms Maria GAVOUNELI (Head of delegation)
Faculty of Law

Substitut/e
Ms Panagiota VATIKALOU
Court of First Instance of Rethymnon, Crete

Substitut/e
Mr Dimosthenis STINGAS
Court of First Instance of SERRES

HUNGARY / HONGRIE

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

Ms Magdolna CSABA
Ministry of the Interior

ICELAND / ISLANDE

Mr Björn THORVALDSSON (Head of delegation)
Special Prosecutors Office

Substitut/e
Mr Sveinn HELGASON
Ministry of the Interior

Mr Helgi Magnús GUNNARSSON
Office of the Director of Public Prosecution

Substitut/e
Mr Páll THORHALLSSON
Prime Minister’s Office

IRELAND / IRLANDE

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

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

Mr Steven FADIAN
Department of Public Expenditure and Reform

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

ITALY / ITALIE

M. Raffaele PICCIRILLO (Chef de délégation)
Ministry of Justice

Substitut/e
Ms Emma RIZZATO
Ministry of Justice

M. Raffaele CANTONE
Anti-Corruption National Authority

Substitut/e
Ms Nicoleta PARISI
Anti-Corruption National Authority

LATVIA / LETTONIE

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

Substitut/e

Ms Anna ALOSINA
Corruption Prevention and Combating Bureau (KNAB)
RIGA

Ms Sintija HELVIGA-EIHVALDE
Corruption Prevention and Combating Bureau (KNAB)

LIECHTENSTEIN

Mr Patrick RITTER (Chef de délégation)
Office for Foreign Affairs

Mr Harald OBERDORFER
Ressort Justiz

Substitut/e

Mr Michael JEHLE
District court

LITHUANIA / LITUANIE

NN (Head of delegation)

Ms Agne VERSELYTE
Ministry of Justice

Substitut/e

Ms Živilė ŠADIANEC
Special Investigation Service

LUXEMBOURG

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

Mme Claudine KONSBRUCK
Ministère de la Justice

Substitut/e

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

Substitut/e

M. Laurent THYES
Ministère de la Justice

MALTA / MALTE

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

Ms Nadia CAMILLERI
Office of the Attorney General

Substitut/e

Mr Peter GRECH
Office of the Attorney General

Substitut/e

Ms Victoria BUTTIGIEG
Office of the Attorney General

REPUBLIC OF MOLDOVA / REPUBLIQUE DE MOLDOVA

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

Mr Valeriu CUPCEA
National Anti-corruption Centre

Substitut/e

Mme Cornelia VICLEANSCHI
Bureau du Procureur Général

MONACO

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

M. Eric SENNA
Cour d'Appel

Substitut/e

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

Substitut/e

Mme Antonella SAMPO-COUMA
Direction des Services Judiciaires

MONTENEGRO

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

Ms Marina MICUNOVIC
Agency for Prevention of Corruption

Substitut/e

Ms Ivana MASANOVIC
Ministry of Justice

Substitut/e

Mr Mladen TOMOVIC
Agency for Prevention of Corruption

NETHERLANDS / PAYS-BAS

Ms Anneloes van der ZIJDE (Head of delegation)
Ministry of the Interior and Kingdom Relations

Substitut/e

Ms Marja van der WERF
Ministry of the Interior and Kingdom Relations

Ms Nina FORTUIN
Ministry of Security and Justice

Substitut/e

Mr Bart RUNNEBOOM
Ministry of Security and Justice

NORWAY / NORVEGE

Ms Mona RANSEDOKKEN (Head of delegation)
Ministry of Justice and Public Security

Substitut/e

Mr Anders Schiøtz WORREN
Ministry of Justice and Public Security

Mr Jens-Oscar NERGARD
Ministry of Local Government and Modernisation

Substitut/e

Mr Øyvind ANDERSEN
Parliament

POLAND / POLOGNE

Mr Rafał KIERZYŃKA (Head of delegation)
Ministry of Justice

Ms Alicja KLAMCZYŃSKA
Ministry of Justice

PORTUGAL

Mr António FOLGADO (Head of delegation)
Ministry of Justice

Mr Daniel MARINHO PIRES
Ministry of Justice

ROMANIA / ROUMANIE

Mr Andrei FURDUI (Head of delegation)
Ministry of Justice

Ms Anca JURMA
Prosecutors' Office attached to the High Court of Cassation
and Justice

Substitut/e

Ms Anca Luminita STROE
Ministry of Justice

Substitut/e

Mr Codrut OLARU
Superior Council of Magistracy

RUSSIAN FEDERATION / FEDERATION DE RUSSIE

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

Mr Aslan YUSUFOV
Bureau Member / Membre du Bureau
Prosecutor General's Office

Substitut/e

Mr Andrei ILIN
Administration of the President

SAN MARINO / SAINT-MARIN

M. Eros GASPERONI (Chef de délégation)
Ministère des Affaires étrangères et politiques

Substitut/e

Mr Stefano PALMUCCI
Official at the Department of Foreign Affairs

Mr Manuel CANTI
Civil Service Department

Substitut/e

Ms Marina MARFORI
State Lawyers' Office

SERBIA / SERBIE

Mr Petar RUNDIC (Head of delegation)
Cabinet of the Minister of Justice

Substitut/e

Ms Katarina NIKOLIC
Ministry of Justice

Ms Milica BOZANIC
Anti-corruption Agency

Substitut/e

Mr Jovan COSIC
Ministry of Justice

SLOVAK REPUBLIC / REPUBLIQUE SLOVAQUE

Ms Alexandra KAPISOVSKA (Head of delegation)
Ministry of Justice

Mr Jan KRALIK
Ministry of Justice
Substitut/e
Ms Dagmar FILLOVA
Ministry of Justice

SLOVENIA / SLOVENIE

Ms Vita HABJAN BARBORIČ (Head of delegation)
Bureau Member / Gender Rapporteur a.i
Commission for the Prevention of Corruption

Mr Matjaž MEŠNJAK
Commission for the Prevention of Corruption

SPAIN / ESPAGNE

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

Mr Rafael VAILLO RAMOS
Ministry of Justice

Substitut/e
Mr Rafael BLAZQUEZ
Ministry of Justice

SWEDEN / SUEDE

Mr Mats JANSSON (Head of delegation)
Ministry of Justice

Mr Mikael TOLLERZ
Ministry of Justice

SWITZERLAND / SUISSE

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

M. Olivier GONIN
Office fédéral de la justice

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

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

“THE FORMER YUGOSLAV REPUBLIC OF MACEDONIA” / “L’EX-RÉPUBLIQUE YOUGOSLAVE DE MACÉDOINE”

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

Ms Elena SAZDOV
Ministry of Justice

TURKEY / TURQUIE

Mr Abdullah MURAT
Ministry of Justice

Mr Güray GÜÇLÜ
Ministry of Justice

UKRAINE

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

Mr Oleksandr PYSARENKO
National Agency for Corruption Prevention

Substitut/e
Mr Yevhen PIKALOV
Prosecutor General’s Office

Substitut/e
Mr Oleksiy SVIATUN
Administration of the President

UNITED KINGDOM / ROYAUME-UNI

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

Mr Daniel HESSE
Ministry of Justice

Substitut/e
Ms Kaminika RAICHURA
Ministry of Justice

UNITED STATES OF AMERICA / ETATS-UNIS D'AMERIQUE

Mr Robert LEVENTHAL (Head of delegation)
U.S Department of State

Substitut/e
Ms Jane LEY
U.S Department of State

Mr Kenneth HARRIS
U.S Department of Justice

Substitut/e
Ms Marianne TOUSSAINT
U.S Department of State

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

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

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

Mr Sergiy VLASENKO (Ukraine)
Group of the European People's Party

REPRESENTATIVES OF THE CDCJ / REPRÉSENTANTS DU CDCJ

No nomination for 2017

Pas de nomination pour 2017

REPRESENTATIVE OF THE CDPC / REPRÉSENTANT DU CDPC

Ms Helena LIŠUCHOVÁ (Czech Republic)
Ministry of Justice

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

Ms Katherine DELIKOURA

OBSERVERS / OBSERVATEURS

Organisation for Economic Co-operation and Development (OECD) / Organisation de Coopération et de Développement Économiques (OCDE)

M. Patrick MOULETTE
Ms Rusudan MIKHELIDZE

Ms Olga SAVRAN
Ms Tanya KHAVANSKA

United Nations Office on Drugs and Crime (UNODC) / Nations Unies, représentées par l'Office des Nations Unies contre la Drogue et le Crime (ONU DC)

Ms Brigitte STROBEL-SHAW

Mr Dimitri VLASSIS

International Anti-Corruption Academy (IACA) / Académie Internationale de lutte contre la corruption

Mr Martin KREUTNER
Ms Christiane POHN-HUFNAGL

Mr Jaroslaw PIETRUSIEWICZ
Ms Simona MARIN

Organisation Of American States (OAS) / Organisation Des Etats Américains (OEA)

Mr Jorge GARCIA-GONZALES

International Institute for Democracy and Electoral Assistance / Institut International pour la Démocratie et l'assistance électorale (International IDEA)

Mr Sam VAN DER STAAK

Appendix 5 – Partners

European Union (EU)

- ▶ Bi-lateral meetings with DG Neighbourhood and Enlargement and DG Home Affairs (Strasbourg, 16 February)
- ▶ European Commission consultations with respect to the Cooperation and Verification Mechanism – CVM (Strasbourg, 26 April)

International Institute for Democracy and Electoral Assistance (International IDEA)

- ▶ Roundtable on The 2030 Agenda: Addressing corruption in support of democratic governance and sustainable development (Brussels, 4 October) – Secretariat
- ▶ Bi-lateral meeting with Yves LETERME, Secretary General and Andrew BRADLEY, Director of the EU Office of International IDEA (Strasbourg, 7 November)

Organisation for Economic Co-operation and Development (OECD)

- ▶ Meetings of the Working Group on Bribery in International Business Transactions – WGB (Paris, 15-16 March; 15-16 June and 13-15 December) – Secretariat
- ▶ Conference on Assessing the implementation and effectiveness of systems for disclosing interests and assets by public officials (Tbilisi, 6-7 June) – Head of Delegation and member of GRECO's Bureau Vita HABJAN BARBORIČ (Slovenia)
- ▶ Anti-Corruption Network for Eastern Europe and Central Asia (ACN) plenary meeting (Paris, 11-13 September) – Secretariat
- ▶ Working party of Senior Public Integrity Officials – SPIO (Paris, 28-29 November) – Secretariat
- ▶ 2nd Meeting of the informal working group of the International Partnership against Corruption in Sport – IPACS (Paris, 14-15 December) – Secretariat

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

- ▶ Seminar co-organised with the OSCE/ODIHR on Reinforcing Accountability and Control of Party Funding – closing event of the meeting of the Political Finance and Political Corruption Research Committee of the International Political Science Committee (Valencia, 5 July) – Secretariat
- ▶ Contribution to the OSCE/Venice Commission revised Guidelines on Political Party Regulation (2017) – GRECO Evaluator Alvis VILKS (Latvia), Secretariat

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

- ▶ United Nations Convention against Corruption 8th meeting of the Open-ended Working Group on the Prevention of Corruption (Vienna, 21-25 August) – Secretariat
- ▶ Preparatory meeting for the Launch of a Global Judicial Integrity Network (Vienna, 24-25 August) – President of GRECO, Secretariat
- ▶ 7th Session of the Conference of the States Parties to the United Nations Convention against Corruption – COSP 7 (Vienna, 6-10 November) – Secretariat
- ▶ COSP 7 side event organised by GRECO / OECD / UNODC: Interest and asset disclosures by public officials: what works and what does not? Latest insights from anti-corruption monitoring bodies (8 November) – Secretariat
- ▶ COSP 7 side event: Enhancing the cooperation between the secretariats of international anti-corruption peer review mechanisms (Vienna, 9 November) – Secretariat

Others

- ▶ Meeting with a delegation from Kyrgyzstan concerning their continued interest in joining GRECO (19 January) – Secretariat

- ▶ Meeting with John DALHUISEN, Regional Director, Europe and Central Asia Regional Office, Amnesty International (24 January) – Secretariat
- ▶ Transparency International panel discussion and report launch – Access all areas: when EU politicians become lobbyists (Brussels, 31 January) – Secretariat
- ▶ International Association of Judges international seminar on Corruption and the rule of law (Lima, 22-24 February) – Secretariat
- ▶ Meeting with Central European Initiative representatives Roberto ANTONIONI and Ugo POLI (28 February) – Secretariat
- ▶ *Università Cattolica del Sacro Cuore* international conference on Preventing corruption: Issues and emerging models, legal, ethical and economic perspectives (Milan, 16-17 March) – President of GRECO
- ▶ University of Strasbourg / CEIFAC / FSI Roundtable on the Fight against corruption in France (Strasbourg, 7 April) – Secretariat
- ▶ Meetings with secretariat members responsible for parliamentary working groups in the Belgian parliament set up to provide follow-up to GRECO's conclusions in the 4th Evaluation Round (Brussels, 21 April) – Secretariat
- ▶ Meeting with the Public Defender of Georgia (28 April) – Secretariat
- ▶ Annual Meeting of the European Bank for Reconstruction and Development (Cyprus, 9-11 May) – President of GRECO, Secretariat
- ▶ Meeting with the Head of the Office of the Minister of the Interior of Greece, Mr PAPASTAVROPOULUS (11 May) – Secretariat
- ▶ Meeting with Ivan CRNČEC, Assistant Minister for the EU and International Judicial Co-operation, Croatia (19 May) – Secretariat
- ▶ Conference on Preventing Conflict of Interest in Bosnia and Herzegovina – Advancing the legal and institutional framework, organised by the Bosnia and Herzegovina Parliamentary Assembly Joint Commission for Human Rights (Sarajevo, 23 May) – GRECO Evaluator Vladimir GEORGIEV (“The former Yugoslav Republic of Macedonia”)
- ▶ International Political Science Association (IPSA) Research committee on political finance and political corruption – RC20 and OSCE/GRECO closing seminar on Reinforcing accountability and control of party funding (Valencia, 4-5 July) – GRECO Evaluator Yves-Marie DOUBLET (France), Secretariat
- ▶ ▪ Expert Forum / OLAF conference on Money and politics – Linking public resources to the illicit financing of political parties (Bucharest, 7-8 September) – Secretariat
- ▶ G20 Anti-Corruption Working Group (Vienna, 13 September) – Secretariat
- ▶ Meetings with Carl Dolan, Director of Transparency International's EU Office (4 October; 24 October) – Secretariat
- ▶ Meeting in the Parliament of Belgium with a delegation of MPs on GRECO's evaluations of Belgium (5 October) – Secretariat
- ▶ Launch of the IMF's European regional economic outlook – fall 2017 (Sarajevo, 13 November) – Secretariat
- ▶ Raoul Wallenberg Institute of Human Rights and Humanitarian Law round table on Anti-corruption and human rights – How to become mutually reinforcing? (Lund, 13-14 November) – Secretariat
- ▶ AMLP Forum 6th Annual Anti-Bribery & Corruption Forum (London, 21-22 November) – Secretariat
- ▶ Federal Office of Justice of Switzerland workshop on law-making related to the financing of political parties and election and referenda campaigns (Berne, 22 November) – Secretariat
- ▶ Meetings between GRECO's President and the Minister of Justice of Romania, Tudorel TOADER and Anne BRASSEUR, former President of the Parliamentary Assembly of the Council of Europe – in the margins of 113th plenary session of the Venice Commission (9 December)
- ▶ Regional Anti-Corruption Initiative (RAI) – Regional workshop on Integrity and professional standards in law enforcement (Bucharest, 13 December) – Secretariat
- ▶ Transparency International (TI) Bosnia and Herzegovina – conference on Transparency and accountability of political party finance (Sarajevo, 14 December) – GRECO Evaluator Yves-Marie DOUBLET (France)

Council of Europe

- ▶ Council of Europe/EU Eastern Partnership Programmatic Cooperation Framework Ukraine: Fight against corruption, conference on Political financing in Ukraine: Current legislation, recent developments and perspectives (Kiev, 15 March) – GRECO Evaluator Yves-Marie DOUBLET (France)
- ▶ Meeting of the Committee on Rules of Procedure, Immunities and Institutional Affairs of the Parliamentary Assembly of the Council of Europe (Paris, 13 March) – Secretariat
- ▶ Committee on Rules of Procedure, Immunities and Institutional Affairs of the Parliamentary Assembly – hearing with the President of GRECO (Strasbourg, 26 April)
- ▶ European Committee on Democracy and Governance (CDDG) Thematic debate on public ethics (Strasbourg, 11 May) – Secretariat
- ▶ Committee of Ministers Thematic Debate on the 2016 Annual Report on the supervision of the execution of judgments and decisions of the European Court of Human Rights (Strasbourg, 1 June) – Secretariat
- ▶ Press launch of GRECO's General Activity Report – 2016 (Brussels, 7 June) – President of GRECO, Secretariat
- ▶ Steering Committee for Human Rights (CDDH) high-level seminar on Human rights and business – Promoting the effective implementation of global and regional instruments (Strasbourg, 9 June) – Secretariat
- ▶ Summer session of the Conference of INGOs (Strasbourg, 30 June)
- ▶ EU/Council of Europe joint project – Controlling Corruption through Law Enforcement and Prevention; Launch event (Chisinau, 29 September) – Secretariat
- ▶ Expert contribution to the Venice Commission Opinion (no. 896/2017) on the draft Law on anti-corruption courts and the draft Law on amendments to the law on the judicial system and the status of judges of Ukraine – GRECO Evaluator Rainer HORNUNG (Germany)
- ▶ Venice Commission 5th UniDem-Med regional seminar on Prevention of corruption and promotion of integrity in the public service: exchange of experiences (Rabat, 25-28 September) – GRECO Expert Jean-Christophe GEISER (Switzerland), Secretariat
- ▶ Parliamentary Assembly of the Council of Europe / Parliaments of Albania, Bosnia and Herzegovina and Italy – seminar on the Implementation of anti-corruption mechanisms on conflicts of interest (Rome, 26-27 October) – Secretariat
- ▶ World Forum for Democracy workshop LAB 2 – Corruption and populism: can the international community help? (Strasbourg, 9 November) – Secretariat
- ▶ EU/Council of Europe joint project – Support to the Implementation of the Judicial Reform in Armenia; seminar on Preventing corruption and human rights: implementation of GRECO's recommendations on Armenia (Yerevan, 27 November) – Secretariat
- ▶ Meeting of the Gender Mainstreaming Team – GMT (Strasbourg, 4 December) – GRECO's Gender Equality Rapporteur Vita HABJAN BARBORIČ (Head of Delegation, Bureau member, Slovenia)
- ▶ 113th plenary session of the Venice Commission – exchange of views on cooperation with GRECO (Venice, 9 December) – President of GRECO
- ▶ EU/Council of Europe Partnership for Good Governance programme; conference on Financing of political parties in Moldova: lessons learned in the Eastern Partnership (Chisinau, 14-15 December) – Secretariat

Appendix 6 – GRECO Secretariat

(within the Directorate General Human Rights and Rule of Law, Information Society and Action against Crime Directorate)

Gianluca ESPOSITO, **Executive Secretary**

Elsbeth REILLY, Personal assistant to the Executive Secretary

Björn JANSON, **Deputy Executive Secretary**

Administrators

Christophe SPECKBACHER

Laura SANZ-LEVIA

Sophie MEUDAL-LEENDERS

Michael JANSSEN (until June 2017)

Liubov SAMOKHINA (from August 2017)

Tania VAN DIJK (from January 2018)

Gerald DUNN

Roman CHLAPAK

Central Office

Penelope PREBENSEN, Administrative Assistant / Assistante administrative

Laure PINCEMAILLE, Assistant / Assistante

Marie-Rose PREVOST, Assistant / Assistante

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

GRECO members (forty-nine) by date of accession

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

Poland (date of accession: 20 May 1999), Hungary (9 July 1999), Georgia (16 September 1999), the United Kingdom (18 September 1999), Bosnia and Herzegovina (25 February 2000), Latvia (27 July 2000), Denmark (3 August 2000), the United States of America (20 September 2000), "the former Yugoslav Republic of 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).

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The Council of Europe is the continent's leading human rights organisation. It comprises 47 member states, 28 of which are members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.



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

