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FIFTH EVALUATION ROUND

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

SECOND COMPLIANCE REPORT

ICELAND



Adopted by GRECO at its 92nd Plenary Meeting
(Strasbourg, 28 November – 2 December 2022)



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

COUNCIL OF EUROPE



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I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions - PTEF) and law enforcement agencies (LEA)".
2. This Second Compliance Report assesses the measures taken by the authorities of Iceland to implement the recommendations issued in the Fifth Round Evaluation Report on Iceland which was adopted at GRECO's 79th Plenary Meeting (23 March 2018) and made public on 12 April 2018, following authorisation by Iceland ([GRECOEval5Rep\(2017\)4](#)). The corresponding Compliance Report was adopted by GRECO at its 86th Plenary Meeting (29 October 2020) and made public on 16 November 2020, following authorisation by Iceland ([GrecoRC5\(2020\)5](#)).
3. As required by GRECO's Rules of Procedure¹, the authorities of Iceland submitted a Situation Report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 1 June 2022 and served, together with additional information, as a basis for this Second Compliance Report.
4. GRECO selected Denmark (with respect to top executive functions in central governments) and Latvia (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Mr Anders Dyrvig RECHENDORFF, on behalf of Denmark, and Ms Diāna KAZINA, on behalf of Latvia. They were assisted by GRECO's Secretariat in drawing up the Compliance Report.

II. ANALYSIS

5. GRECO, in its Fifth Round Evaluation Report, addressed eighteen recommendations to Iceland. In the Compliance Report, GRECO concluded that recommendations i, v, vii and viii had been implemented satisfactorily or dealt with in a satisfactory manner, recommendations ii, iv, vi, ix, xii, xvi and xviii had been partly implemented, and recommendations iii, x, xi, xiii, xiv, xv and xvii had not been implemented by Iceland. Compliance with the outstanding recommendations is dealt with below.

Preventing corruption and promoting integrity in central governments (top executive functions)

Recommendation ii

6. *GRECO recommended that (i) the codes of conduct for persons entrusted with top executive functions be harmonised or consolidated as the case may be, and complemented with appropriate guidance, including explanatory comments and concrete examples, as well as with confidential counselling and (ii) a credible mechanism of supervision and sanctions be put in place.*

¹ The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised bis.

7. It is recalled that in the Compliance report this recommendation was partly implemented. More precisely, with respect to the first part of the recommendation, no measures had been taken to tackle the discrepancies between the various codes, nor to clarify and make usable the ethical standards applicable to PTEFs. Regarding the second part of the recommendation, GRECO acknowledged that the confidential counselling, guidance and monitoring role of the Prime Minister's Office on integrity related matters was provided for by the amendment to the Information Act. However, it was expected that the progress of the new supervisory mechanism be re-evaluated once the legislation was enforced.
8. The authorities of Iceland now indicate that a revision of the codes of conduct for PTEFs has been launched in November 2021. The Prime Minister appointed in October 2022 a working group whose task is to lead the revising work, harmonise the various codes, take a position on whether a code needs to be established for ministerial advisors and other groups, establish a plan for regular training of all civil servants, formulate proposals on how to guarantee a constant discussion between civil servants about integrity, ethics in public work and professionalism and prepare specific training material for civil servants on ethical issues and integrity. Moreover, they indicate that the 2019 amendments to the Information Act, which provides for confidential counselling aimed at PTEFs on the implementation of the codes of conduct, have been enforced, and that six PTEFs have used such confidential counselling, including four ministers. As regards the second part of the recommendation, the authorities recall that, according to them, the existing sanctions contained in law are sufficient to ensure the enforcement of the codes of conduct, although such codes only contain guidelines. They also underline that complaints against possible violations of the codes of conduct can be dealt with by the Ombudsman of Parliament.
9. GRECO takes note, as regards the first part of the recommendation, that the codes of conduct aimed at PTEFs are being revised and further encourages the authorities to use this revision so that the various codes aimed at PTEFs are harmonised and complemented with appropriate guidance. GRECO also notes that the legislation which makes it possible for PTEFs to seek confidential counselling on integrity-related matters have been enforced and practically used, which is in line with the recommendation. As regards the second part of the recommendation, GRECO notes that no new information has been provided to demonstrate that the mechanism of supervision and sanctions against violations of the codes of conduct has been strengthened.
10. GRECO concludes that recommendation ii remains partly implemented.

Recommendation iii

11. *GRECO recommended that efficient internal mechanisms to promote and raise awareness of integrity matters among persons entrusted with top executive functions be established and properly implemented, including training at regular intervals.*
12. It is recalled that in the Compliance report this recommendation was not implemented. GRECO noted that, in spite of some progress in respect of training and awareness raising, no tangible results could be noted.

13. The authorities of Iceland now report that a workshop took place in March 2022 with all ministers about the Ministerial Code of Conduct, with the participation of the Ombudsman of Parliament and the Chairman of the Centre of Ethics of the University. They also recall that a working group appointed in 2018 by the Prime Minister issued a strategic report containing 25 recommendations to strengthen public trust in politics. Until the end of 2021, the Centre for Ethics of the University of Iceland was entrusted to supervise the implementation of this report and ensure subsequent counselling. In this framework, the Centre prepared some material on integrity-related matters. The authorities also recall that the Prime Minister's Office has translated the Danish manual "Seven Main Duties for Staff in Central Administration – Kodex VII", containing guidance with ethical examples and dilemmas. Moreover, it is reported that in May 2022, the Prime Minister's Office organised a lecture aimed at the permanent secretaries of the ministries on the relationships between ministers and other PTEFs and ethical issues that could arise within the framework of this cooperation. The same course is offered by the School for Central Government to the directors general in each ministry - the first course took place on 13 October 2022. A course for ministerial advisors took place on 23 November. All PTEFs should have then be offered such a training by the end of 2022. The School is already hosting mandatory bi-annual training for new staff in the Government offices, including ethics.
14. GRECO acknowledges the political will to develop awareness raising activities and training on integrity-related matters, which is demonstrated through some work in progress in this respect. This includes an on-going work to revise the relevant codes of conduct aimed at PTEFs, as well as the provision of relevant materials and the recent development of trainings aimed at Government staff. Such trainings need to be pursued at regular intervals aimed directly at PTEFs to promote and raise their awareness on integrity-related matters. As these measures constitute at this stage a work in progress, GRECO cannot consider that this recommendation has been implemented more than partly.
15. GRECO concludes that recommendation iii has been partly implemented.

Recommendation iv

16. *GRECO recommended introducing rules on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence governmental legislative and other work.*
17. It is recalled that in the Compliance report this recommendation was partly implemented. GRECO noted in particular that guidance for public officials on their contacts with third parties and lobbyists was lacking.
18. The authorities of Iceland now report that the Act on conflicts of interest in the Government Offices entered into force in January 2021. It covers PTEFs. They also indicate that more precise rules are being drafted by the Government on public officials' contacts with third parties and lobbyists, to be adopted before the end of 2022.
19. GRECO notes that guidance for public officials on their contacts with third parties and lobbyists is under preparation, to complement the existing legislation on lobbying, and encourages the authorities to finalise the guidelines as soon as possible.

20. GRECO concludes that recommendation iv remains partly implemented.

Recommendation vi

21. *GRECO recommended establishing a more robust set of rules on gifts and other benefits for persons entrusted with top executive functions, which would provide clear reporting lines and the publicity of information, and appropriate guidance to ensure all forms of benefits are adequately dealt with.*
22. It is recalled that in the Compliance report this recommendation was partly implemented. More precisely, GRECO noted that the legal framework and appropriate procedures were in place as regards gifts in respect of PTEFs, but indicated that clear guidance would still be needed to ensure that all forms of benefits were adequately dealt with. GRECO was also pleased to note that the threshold for reporting on gifts (€ 330) could be lowered in the future.
23. The authorities of Iceland now recall that the law provides that PTEFs must report all gifts and other benefits received in relation to their work of a total value exceeding ISK 50 000 (approximately € 340) per year. They report that the Prime Minister keeps a log of gifts registered and publishes it on the website of the Government Offices, independent of the total yearly value of the gifts received, and has encouraged other ministers to proceed similarly. They also recall that, according to the law now in force², PTEFs receive confidential counselling and are regularly informed about this possibility. The authorities indicate that the form for reporting gifts contains guidelines on what gifts must be reported and states that PTEFs must report all benefits of a value exceeding ISK 50.000 that are not available to the public and have been received in relation to their work. The lowering of the threshold for reporting gifts and other benefits is still an issue under consideration by the Prime Minister's Office.
24. GRECO reiterates its appreciation of the legal framework and the procedures aimed at PTEFs as regards gifts and other benefits, including confidential counselling. It notes that further guidance is given to PTEFs in the form for reporting gifts, which also recalls that PTEFs must report all benefits that are not available to the public if their value exceeds ISK 50 000 (approximately € 340) per year. Moreover, GRECO notes that the Prime Minister has decided to publish on her website all gifts and other benefits received, whatever their value is, and has raised the awareness among other ministers on this practice. Although the threshold for reporting gifts and other benefits should be lowered in the view of GRECO, this issue remains under consideration by the Prime Minister's Office. GRECO considers that - overall - the rules on gifts and other benefits for PTEFs, as well as guidance and awareness raising, have been strengthened. This is in line with the recommendation.
25. GRECO concludes that recommendation vi has been implemented satisfactorily.

Recommendation ix

² Act NO 64/2020 on Conflicts of interest in the Government offices of Iceland.

26. *GRECO recommended strengthening the credibility of the registration system for declarations of financial interests in respect of persons exercising top executive functions, by ensuring greater adherence to the rules through a system of monitoring, providing adequate advice and guidance, and implementing a mechanism of sanction when requirements are not observed.*
27. It is recalled that in the Compliance report this recommendation was partly implemented. GRECO appreciated that, according to the Act on Conflicts of interest in the Government offices, the Prime Minister had a role in providing guidance and monitoring the registration of assets and gifts, lobbyists, outside activities and employment after the termination of functions, and was able to examine violations on his/her own initiative and inform the ministries of violations. It noted that no changes to the sanctions system were planned. GRECO was expecting to assess the adherence to the new rules once the system was operational.
28. The authorities of Iceland now indicate that the Act on Conflicts of interest in the Government offices has entered into force and that the Prime Minister has informed all PTEFs about their duties regarding integrity-related matters. They indicate that almost all PTEFs have fulfilled their registration obligations and that the Prime Minister will notify the ministers of any breach in the duty of reporting. The registry of declarations of ministers, permanent secretaries and ministerial advisers is partly made public on the website of the Government. Rules on the monitoring of the adherence to the system are being drafted and are due to be operational before the beginning of 2023. The authorities reiterate that there is no plan to introduce direct sanctions for PTEFs not fulfilling their obligations as regards the registration of assets and liabilities, as negligence and insubordination against legal instructions or wrong behaviours are already sanctioned by the law³. They add that, as regards ministers, breaches of the obligations could also lead to political consequences, such as an obligation of apologies, a motion of non-confidence or an impeachment.
29. GRECO takes note of the evolution of the situation since the entry into force of the new legislation, and of the fact that almost all PTEFs have fulfilled their obligations as regards the declaration of financial interests. It reiterates its appreciation of the guidance and monitoring role given by the law to the Prime Minister vis-a-vis other PTEFs on this issue. It notes that the authorities consider that a mechanism of sanctions in case of violation of the integrity-related obligations is already in place through the existing legislation. This mechanism is strengthened by the political consequences of non-compliance with the obligations and the guidance and monitoring role assigned to the Prime Minister. GRECO takes note of this position, but does not consider that “political consequences” are in line with the recommendation to implement a mechanism of sanctions. GRECO also note that Rules on the monitoring of the adherence to the system are being drafted and is of the opinion that such rules could usefully complement the current registration system of financial interests, and thus strengthen its credibility as expected by the recommendation. It encourages the authorities to finalize, publish and implement these rules.
30. GRECO concludes that recommendation ix remains partly implemented.

³ Labour Law and/or the Government Employees Act N° 70/1996, as well as the General Penal Code N0 19/1940 (Chapter XIV – offences in public office).

Recommendation x.

31. *GRECO recommended ensuring that the resources allocated to the Icelandic police are sufficient enough to carry out their work effectively, particularly for the actual implementation of integrity-related policies.*
32. It is recalled that in the Compliance report this recommendation was not implemented. GRECO noted that the official Police Policy Document (PPD) for 2019-2023 was expected to contribute to a better allocation of resources to the Police, but did not note tangible results at that stage.
33. The authorities of Iceland reiterate the main objectives of the official Police Policy Document (PPD) for 2019-2023, which is being implemented, and report now that it has led to an increase in the budget of the Police, from ISK 12 billion (approximately € 81,6 million) in 2018 to almost ISK 16 billion (approximately € 109 million) in 2021. The PPD has also raised the awareness on integrity-related matters, with new basic training curricula on codes of conduct and police ethics, conflicts of interest and anti-corruption measures. In 2022, a total of 74 police officers have undergone training and courses on these matters and a total of 127 students in police studies at the University of Akureyri have undergone an ethics course.
34. GRECO takes note of the information provided, in particular as regards substantial increases in the budget of the Police and the development of basic training on police ethics and integrity-related matters. This increased budget, in addition to the implementation of the PPD which facilitates a more efficient allocation of resources and increases awareness in the form of training and courses held on ethics and integrity matters, are tangible evidence that increased resources have been allocated for the police to carry out their work, including regarding integrity related policies.
35. GRECO concludes that recommendation x has been implemented satisfactorily.

Recommendation xi

36. *GRECO recommended that (i) the Codes of Conduct for the Police and the Icelandic Coast Guard be complemented to address more broadly conflicts of interest and political activities, and so as to offer practical guidance through explanatory comments and practical examples on all corruption-related subjects, as well as confidential counselling and (ii) a credible mechanism of supervision and sanctions be clearly provided for.*
37. It is recalled that in the Compliance report this recommendation was not implemented, as no progress had been reported.
38. The authorities of Iceland now report that the Codes of Conduct for the Police and the Coast Gard have been complemented according to GRECO's recommendations and are due to be published before the end of 2022.
39. GRECO notes that the Codes of Conduct for the Police and the Coast Gard have been amended and is looking forward to examining the revised texts, once these are available.

40. GRECO concludes that recommendation xi has not been implemented.

Recommendation xii

41. *GRECO recommended that regular training programmes and awareness raising measures on integrity and professional ethics be developed (covering conflicts of interest and other corruption prevention-related matters) for law enforcement bodies, taking into consideration their specificity, the variety of duties and their vulnerabilities.*
42. It is recalled that in the Compliance report this recommendation was partly implemented. GRECO welcomed the new courses on codes of conduct as part of regular introduction and basic training for the Police, including online training. However, no information was provided as regards the training of Coast Guard. GRECO called on the authorities to regularly monitor and adapt the integrity and ethics training for law enforcement to ensure that it is practice-oriented and covers the various conflicts of interest aspects.
43. The authorities of Iceland now reiterate that training courses on the codes of conduct are taking place at the Education Centre of the National Commissioner of Icelandic Police (NCIP) and at the University of Akureyri. They indicate that the training courses for Coast Guard are due to be reviewed by the end of 2022.
44. As no new information has been reported at this stage, GRECO concludes that recommendation xii remains partly implemented.

Recommendation xiii

45. *GRECO recommended that (i) the role of the competence assessment committee in the selection of candidates at all levels be strengthened and that integrity checks be included in the recruitment process and periodically used (ii) vacancies as a rule be advertised and filled following a selection process based on clear criteria.*
46. It is recalled that in the Compliance report this recommendation was not implemented. GRECO regretted that the role of the Competence Assessment Committee (CAC) had not evolved, in particular by requiring that any refusal to follow its decisions on appointments should be grounded. GRECO appreciated that the Minister of Justice had stressed to all police commissioners the need to advertise vacancies and noted that this matter would be further monitored.
47. The authorities of Iceland now indicate, as regards the first part of the recommendation, that in June 2021, the Police Act abolished the CAC as an advisory body in police appointments. Police commissioners, as directors of their institutions, are responsible for the appointment of police officers. Procedures for appointing police officers, including specific integrity assessment in the recruiting process and periodical integrity checks on acting police officers, are due to be issued by the NCIP before the end of 2022, in consultation with the Police Council.
48. The authorities now report, as regards the second part of the recommendation, that detailed recruitment and selection standards and procedures are under preparation

within the NCIP in cooperation with other Police Commissioners. These standards will include clear criteria for each type of vacancy and provide for integrity checks in the recruitment process. They reiterate that the Minister of Justice has informed all police commissioners the necessity for advising the vacancies, in particular as regards high-ranking police officers, and indicate that he has monitored the hiring of police staff, which makes it possible to confirm that the rules have been properly followed, without complaints.

49. GRECO takes note of the authorities' decision to abolish the CAC and give all its powers to the police commissioners in as far as appointments are concerned. It notes that new procedures are due to be introduced for such appointments, including initial and continuous integrity checks. As long as it has not been able to analyse these procedures, GRECO cannot assess the first part of the recommendation as implemented, even partly. The authorities need to show that the appointment procedures of police officers will safeguard integrity-related matters. As regards the second part of the recommendation, GRECO notes that recruitment and selection standards and procedures are under preparation and is looking forward to examining them. GRECO notes with satisfaction that the Minister of Justice has ensured the advertisement of the vacancies within the Police and has monitored the appointment procedure of police officers according to clear criteria. It expects that the procedures to be issued ensure that the selection process be pursued accordingly, in a systematic way.
50. GRECO concludes that recommendation xiii has been partly implemented.

Recommendation xiv

51. *GRECO recommended that clear, fair and transparent criteria, based on merit, be introduced for the non-renewing of contracts for law enforcement officers as well as clear appeal possibilities to challenge such decisions.*
52. It is recalled that in the Compliance report this recommendation was not implemented, as no tangible progress had been made.
53. The authorities of Iceland now recall the existing legislation and rules applicable before the adoption of the Evaluation report, while acknowledging the need for an intergovernmental analysis of the legislation on the non-renewal of police officers' contracts.
54. As no new information has been provided, GRECO concludes that recommendation xiv has not been implemented.

Recommendation xv

55. *GRECO recommended that robust sets of rules be elaborated for the Police and for the Icelandic Coast Guard concerning the acceptance of gifts, hospitality and other benefits.*
56. It is recalled that in the Compliance report this recommendation was not implemented, as no tangible progress had been made.

57. The authorities of Iceland now report that rules on the acceptance of gifts, hospitality and other benefits were adopted on 25 June 2021 and introduced to all police officers. Similar rules are being drafted for the Coast Guard.
58. GRECO welcomes the new rules on gifts and other benefits which apply now to all police officers. They recall the principle of neutrality, define the concept of inappropriate concessions (including examples), provide detailed exceptions for receiving gifts or discounts and provide for a monitoring of these rules as well as sanctions. They also include a checklist to assist police staff in deciding whether to accept gifts, which should be a helpful and practical tool in the everyday life. This is in line with the recommendation. It is expected that similar rules apply to Coast Guard staff.
59. GRECO concludes that recommendation xv has been partly implemented.

Recommendation xvi

60. *GRECO recommended that a study be conducted on the practice of parallel or post-employment activities of law enforcement officers and in the light of the results, to adopt a stricter framework which would limit risks of conflicts of interest.*
61. It is recalled that in the Compliance report this recommendation was partly implemented. GRECO welcomed the new regulatory framework on parallel activities prone to conflicts of interest and was expecting that similar regulation be adopted as regards post-employment.
62. The authorities of Iceland now report that new regulations on post-employment restrictions are still under consideration. No study on the practice of parallel or post-employment activities have been conducted so far, but no complaints on such issues have been registered, which indicates, according to them, that the risk of conflicts of interest in these fields is not high.
63. As no new information providing tangible progress has been reported, GRECO concludes that recommendation xvi remains partly implemented.

Recommendation xvii

64. *GRECO recommended that (i) a central unit be established or designated within the police structure to deal with internal supervision and inquiries, under the responsibility of the National Police Commissioner who should have in practice a clear leadership for internal policies, including on integrity, and risk management and supervision; and (ii) the chain of command be reviewed to ensure the effective implementation of such policies, without ministerial and political interference.*
65. It is recalled that in the Compliance report this recommendation was not implemented. GRECO understood that the issue of internal supervision of the Police would be considered in the context of the on-going reorganisation of the Police and the audit by the National Audit Office.

66. The authorities of Iceland now report that in 2021, the Minister of Justice signed a new regulation aimed at clarifying the role of the NCIP within the Police so that it can function as the supreme authority within law enforcement agencies and as the chief-coordinator of the Police. However, they reiterate that the NCIP remains to be further re-organised according to the results of the administrative audit carried out by the Independent Audit of State Accounts. In addition, they indicate that Parliament adopted in 2021 amendments to the Act of the Police which have established the Police Council and increased the role of the Police Supervisory Committee (NEL) which has been entrusted with the independent assessment of the merits of individual complaints against the Police and the delivering of a reasoned opinion on the situations at stake. If a violation of the ethical or integrity-related standards is found, the case is forwarded to the Police commissioner who must deal with the case in accordance with the law⁴ and notify the outcome of the case to the NEL. If a criminal offence is suspected, the NEL must forward the case to the prosecution service.
67. GRECO welcomes the significant progress towards the implementation of internal supervision of the Police through the new regulation aimed at clarifying the role of the NCIP within the Police and the amendments to the Act of the Police setting up the Police Council and increasing the role of the Police Supervisory Committee. This latter Committee has now been empowered with the independent assessment of individual complaints against the Police. This seems to be in line with the recommendation. However, GRECO notes that further re-organisation within the Police remains to be done to strengthen this internal control, in particular the role of the NCIP, according to the conclusions of the administrative audit carried out in 2020. GRECO is looking forward to analysing this re-organisation, as well as the relevant legal texts which organise it.
68. GRECO concludes that recommendation xvii has been partly implemented.

Recommendation xviii

69. *GRECO recommended that clear rules on whistleblower protection be developed and implemented for law enforcement officers, to complement the existing reporting duty under the rules of conduct.*
70. It is recalled that in the Compliance report this recommendation was partly implemented. GRECO welcomed the new law on whistleblowers' protection, but was expecting its entry into force, as well as dedicated measures for its implementation in practice (such as awareness raising and training) with respect to law enforcement officers.
71. The authorities of Iceland now report that the Act on whistleblower protection⁵, covering all police staff, entered into force on 1 January 2021.
72. GRECO welcomes the entry into force in the Act on whistleblowers, which applies to law enforcement officers. It defines internal and external whistleblowing, provides measures for protecting whistleblowers, as well as rules on procedures at work to

⁴ Administrative Procedure Act N° 37/1993 and Act on the Rights and Duties of Government Employees N° 70/1996.

⁵ Act n° 40/2020.

facilitate disclosure of offenses or other reprehensible conduct. GRECO is looking forward to examining awareness raising and training measures to be implemented to ensure the proper enforcement of the new legislation.

73. GRECO concludes that recommendation xviii remains partly implemented.

III. CONCLUSIONS

74. **In view of the foregoing, GRECO concludes that Iceland has implemented satisfactorily or dealt satisfactory manner only six of the eighteen recommendations contained in the Fifth Round Evaluation Report.** Of the remaining recommendations, ten have been partly implemented and two have not been implemented.

75. More specifically, recommendation i, v, vi, vii, viii and x have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations ii, iii, iv, ix, xii, xiii, xv- xviii have been partly implemented, and recommendations xi and xiv have not been implemented.

76. As regards persons entrusted with top executive functions (PTEFs), the elaboration of a comprehensive strategic report analysing various aspects of conflicts of interest, involving top executive functions and issuing recommendations for improvement, proved to be a good strategic basis to improve integrity and the management of conflicts of interest with respect to PTEFs. GRECO appreciates that, as a follow-up to its evaluation, the Law on measures to deal with conflicts of interest of PTEFs was adopted, covering ministers, permanent secretaries and ministerial advisers. The Act regulates *inter alia* contacts with lobbyists, outside activities, asset declarations, gifts and post-employment restrictions – though this latter issue needs to be enhanced. An amendment to the Information Act makes it possible for PTEFs to seek for confidential counselling on ethical and integrity related matters. The political will to develop integrity related matters is demonstrated by the on-going revision of the codes of conduct. However, these codes remain to be harmonised and completed with appropriate guidance, supervision and sanctions.

77. As for Law enforcement agencies (LEAs), work is in progress to reorganise the Police. The chain of command will have to be reviewed and political interference limited. The appointment system is being reviewed, vacancies are announced publicly, and stronger powers given to the police commissioners in the recruitment. It is expected that it will ensure transparent and fair career procedures, including by providing criteria for non-renewal of contracts. The new regulatory frameworks on parallel activities and on gifts and other benefits are welcomed. Similar rules on gifts and other benefits are still lacking for the Coast Guard, and a framework on post-employment is still expected for all LEAs. The revised Codes of Conduct of the Police and the Coast Guard are due to be finalised. It is expected that they are complemented with an effective mechanism of confidential counselling. GRECO appreciates the measures taken to raise awareness through regular training of the police staff on integrity-related matters, and similar measures for the Coast Guard are expected. Significant progress concerning internal supervision of the Police is underway by clarifying the role of the National Commissioner of the Icelandic Police (NCIP) and the amendments to the Act of the Police, setting up the Police Council and increasing the role of the Police Supervisory Committee, empowered to assess

individual complaints against the Police. The adoption of the new Law on whistleblowers' protection is welcomed, but specific measures for its implementation in practice will also be needed.

78. In view of the above, GRECO concludes that Iceland is found *not to be in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report* in the meaning of Rule 31 revised bis, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of Iceland to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations ii - iv, ix, and xi - xviii) as soon as possible, however – at the latest – by 31 December 2023.
79. Finally, GRECO invites the authorities of Iceland to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.