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Sixth Evaluation Round

Questionnaire

Preventing corruption and promoting integrity at the sub-national level

Adopted by GRECO
at its 96th plenary meeting
(Strasbourg, 18-22 March 2024)

Introduction

1. By choosing “preventing corruption and promoting integrity at the sub-national level” for the theme of its 6th Evaluation Round, GRECO is again breaking new ground and focusing, for the first time, on authorities at local, regional or other decentralised level (the “sub-national authorities”). These authorities make decisions regarding a large proportion of public expenditure and provide a variety of public services. They are an important part of national democracies, and their decisions affect citizens’ lives in direct and immediate ways. Therefore, preventing corruption and promoting integrity at the sub-national level is of paramount importance to ensure the quality of governance and accountability of decentralised government.
2. The focus of the evaluation is placed on sub-national authorities with competence, amongst others, to adopt legislation or regulations; authorise expenditure; take decisions over urban planning, development and procurement; levy taxes; decide which services are provided and to whom; make decisions over recruitment and remuneration, etc. For the purpose of the 6th Evaluation Round, bearing in mind each member State’s constitutional set-up¹, the sub-national authorities will cover executive and representative bodies, including elected or politically appointed office-holders who, whether individually or collectively, take significant decisions, mainly of executive nature, on behalf of the sub-national authority under evaluation. The evaluation will also cover public officials employed by the sub-national authorities under review where such officials, amongst others, authorise expenditure; take decisions over urban planning, development and procurement; decide which services are provided and to whom; make decisions over recruitment and remuneration, etc.
3. Prior to the evaluation, the GRECO Secretariat will identify, on the basis of a dialogue with the member State concerned, two sub-national authorities, including (i) a capital or, in the absence of agreement, an alternative major city; (ii) a regional or other sub-national authority or, particularly in countries having only one sub-national tier, a municipality (size to be determined).
4. In terms of the methodology of the evaluation process, GRECO has developed a questionnaire intended to collect all relevant information. An on-site visit to the two sub-national authorities selected for the evaluation will follow. GRECO will then draw its findings after conducting interviews with all relevant State (public) stakeholders, as well as relevant non-State actors, including civil society and media. The evaluation process will therefore strive to accommodate the constitutional framework of all member States and reflect countries with different systems of government and different relationships between national and sub-national levels by addressing recommendations to the appropriate authorities. Accordingly, recommendations that only implicate the sub-national authority under review will be directed to such an authority only, and not the central (federal) government.

¹ In this context, the term “constitutional set-up” is to be understood as meaning a country’s constitution, practice and specificities.

5. The questionnaire is divided into two main chapters, both containing targeted questions under specific headings. Part A aims at obtaining a comprehensive understanding of the competences, mechanisms and responsibilities of national authorities as regards the promotion of integrity and prevention of corruption at the sub-national level, where applicable. It is intended to be completed by national authorities. Part B aims at providing in-depth focus on the existing legislation, regulations, procedures, bodies and mechanisms, as applicable, addressing the promotion of integrity and prevention of corruption in the two sub-national authorities identified for the evaluation. It is intended to be completed by the two sub-national authorities selected for the evaluation. However, the national authorities may also complement the responses under Part B as they see fit (with particular reference to questions 4.3, 5.4, 7.2, 8.5, 8.7, 8.8, 9.4, 9.5, 10.8, 10.9, and 11.4 through 11.7). Replies to the Questionnaire, together with any supporting documents, should be provided in English or French.

6. As in the two previous evaluation rounds, emphasis will be put on the effective implementation of existing legislation and regulations. For this purpose, given that the questionnaire is detailed and requires precise answers, GRECO expects to receive extensive information on organisational arrangements and procedures, as well as their implementation in practice, supported by practical examples and statistics, if available. Therefore, when outlining rules and regulations, the authorities are encouraged to indicate to what extent these are implemented in practice. The absence, in a member State, of a feature referred to in the questionnaire will not necessarily lead to a recommendation to fill that “gap”. Situations of this kind will be assessed in the context of the sub-national authority selected for the evaluation, findings made during/after the evaluation visit and the constitutional set-up.

7. It should be emphasised that preventing corruption and promoting integrity at the sub-national level is also a coherent continuation of the work carried out in previous round, notably the 2nd, 4th and 5th Evaluation Rounds which covered governments, parliaments, judges, prosecutors, central public administration and law enforcement agencies, forming essential components of central State power. While the 6th Round does not seek to revisit any of the themes covered under previous evaluation rounds, member States may reference the previous rounds and/or provide additional information on any new developments relating to topics where this is relevant to preventing corruption and promoting integrity at the sub-national level, such as criminal liability for corruption offences, preventing corruption in public administration, etc.

8. For the purpose of this questionnaire, the following terms have the following meanings:

“confidential counselling”	means advice on ethical and integrity issues provided by a specialised official or authority, on a confidential basis.
“delegated competences”	means competences delegated by a national Government, ministry, department or other relevant body to a sub-national authority, in accordance with national legislation, regulations or case-law.

“exclusive competences”	means competences entrusted exclusively to the sub-national authority by national legislation, regulations or case-law, such as budget approval and authorisation of expenditure, urban planning and infrastructure, provision of certain public services, levying taxes, etc.
“executive body”	is a politically elected or appointed office-holder/s, who, whether individually or collectively, has overall executive responsibility for the governance of a sub-national authority and carries out day-to-day operation activities and control (e.g. a mayor and/or his/her deputies, a municipality manager, a president of a region and/or his/her deputies, a collegiate executive organ or otherwise).
“incompatibilities”	refers to statutory (or case-law developed) prohibitions on simultaneously holding two offices by a politically elected or appointed office-holder or a public official.
“independent/social audits”	are audits conducted by civil society organisations/non-State actors through accessing information from the Government, the sub-national authority, other sources, engaging citizens and reviewing the situation on the ground.
“integrity checks”	may comprise, amongst other things, screening of personal criminal records, previous ethics and integrity breaches, financial disclosure, integrity testing, etc.
“integrity legislation”	means laws, regulations and rules governing, without limitation, ethical standards, rules of conduct, contacts with third parties, conflicts of interest, gifts, incompatibilities, outside activities, post-employment restrictions, disclosure of assets, interests and liabilities, misuse of public resources and confidential information, internal controls, etc.
“municipally-controlled enterprise”	is a company or entity in which a sub-national authority, represented by either the executive body, the representative body or public officials, has, directly or indirectly, the power to direct or cause the direction of the management and policies of such a company or entity, whether through the ownership of voting shares or by contract or otherwise.
“official information”	means all information recorded in any form, drawn up or received and held by public authorities (national and sub-national).
“open data”	are accessible and machine-readable data which can be used freely, modified and shared by anyone for any purpose. This may apply to, without limitation, lobbying registers, interests’ registers, public servants directories, composition of the executive and representative bodies, detailed annual budget, detailed annual expenditures, list of contractors and

corresponding awarded contracts, public-private partnerships, licenses and permits, grants and scholarships, auditing datasets, voting records, meeting records, campaign promises, assets declarations, land and property registers, tax databases, etc.

“partner and dependent family members”	(i) partners are individuals who are related to a politically elected or appointed office-holder and/or a public official through marriage or similar (civil) forms of partnerships or other type of (known) (sexual) relationship, and (ii) dependent family members are individuals who are financially or socially dependent/reliant on a politically elected or appointed office-holder and/or a public official.
“politically elected or appointed office-holder”	is a person who is elected by citizens of a sub-national authority or appointed by a collective body of the sub-national authority or otherwise, to a position of authority or service in either the executive body or the representative body, for a certain period of time.
“public official”	is a person employed by a sub-national authority, who, individually or collectively, take significant decisions, including, amongst others, authorising expenditure; deciding over urban planning, development and procurement; deciding which services are provided and to whom; deciding over recruitment and remuneration, etc. This may include civil servants, persons employed by the sub-national authority on a contractual basis, as well as other persons having a role in advising on or influencing decisions taken by the executive body or the representative body of the sub-national authority.
“representative body”	is a group of politically elected or appointed office-holders who, collectively, may, amongst other things, take significant decisions of an executive nature, adopt policies or strategies in respect of a sub-national authority, represent citizens of the sub-national authority, etc. (e.g. a municipal, regional or departmental council).
“sub-national authority”	is a public authority at the local, regional or other decentralised level, comprising an executive body and/or a representative body, with competence to, amongst other things, authorise expenditure, take decisions or policies over urban planning, development and procurement, levy taxes, decide which services are provided and to whom or make decisions over recruitment and remuneration of public officials, represent citizens, etc.

A. System of government at the national and sub-national level and competences of national authorities in promoting integrity and preventing corruption at the sub-national level.

1. System of government

1.1 Please provide a general, brief overview of the political system of government at the national and sub-national level, with a particular focus on the relationship between national and sub-national levels, indicating constitutional and legal provisions that may be helpful in describing the system (e.g. the Constitution, laws on the organisation and functioning of the sub-national level), and paying attention to the following issues:

- i. the political system of government (e.g. a unitary State, a federal State, a confederation, etc.);
- ii. the organisation of government at the sub-national level (e.g. centralised/decentralised system, number of tiers at the sub-national level, number of units per tier etc.);
- iii. the system of government at the sub-national level, in respect of each tier (e.g. executive and representative bodies, if any, elected or appointed in respect of each tier, their composition, mandate, functioning and powers);
- iv. status of the capital under national law, if any; and
- v. legal status of the European Charter of Local Self-Government, if applicable.

1.2 Please describe the relationship and allocation of responsibilities and competences between the national and sub-national authorities in respect of work relating to the prevention of corruption and promotion of integrity at the sub-national level, with reference to the constitutional and other applicable frameworks.

2. National anti-corruption / integrity policy and/or strategy and their applicability to sub-national authorities

2.1 Please indicate whether there are any national anti-corruption / integrity policy and/or strategy (or other similar document) in place. If so, and if applicable, please:

- i. indicate whether they cover all or certain sub-national authorities and provide text(s);
- ii. describe the roles and responsibilities, if any, assigned to sub-national authorities in implementing the national anti-corruption / integrity policy and/or strategy (or other similar document) (e.g. primary responsibility, secondary responsibility, no direct responsibility);
- iii. describe any national authorities which have been entrusted with primary responsibility for the management or coordination of the implementation of the national anti-corruption / integrity policy and/or strategy (or other similar document). If so, please indicate their relationship with sub-national authorities which have a role in implementing the national anti-corruption policy and/or strategy (or other similar document);
- iv. indicate any procedures and processes in place to ensure or promote the implementation of the national anti-corruption / integrity policy and/or strategy

(or other similar document) at the sub-national level (e.g. allocation of adequate resources and means, etc.);

- v. describe any obligations on sub-national authorities to provide any (periodic or upon request) reports to national authorities regarding the implementation of the national anti-corruption / integrity policy and/or strategy or (other similar document). If so, please provide any such available reports or extracts/summaries thereof; and
- vi. provide any reports produced by national authorities related to the sub-national authorities' implementation of the anti-corruption / integrity policy and/or strategy (or other similar document).

2.2 Should there be no national anti-corruption / integrity policy and/or strategy (or other similar document), please explain why.

3. National anti-corruption and integrity legislation and its implementation by sub-national authorities

3.1 Please indicate whether any national anti-corruption and integrity legislation is applicable to sub-national authorities and public officials. If so, please:

- i. provide relevant texts;
- ii. describe the roles, if any, assigned to sub-national authorities in implementing the national anti-corruption and integrity legislation (e.g. primary responsibility, secondary responsibility, no direct responsibility); and
- iii. describe competent bodies, mechanisms and measures at the national level with the responsibility of ensuring the implementation of the national anti-corruption and integrity legislation at the sub-national level², including:
 - (a) national supervisory bodies (e.g. Government, designated ministry, national body of public ethics, anti-corruption / integrity body etc.) with competences to oversee implementation by and accountability of sub-national authorities regarding national anti-corruption and integrity legislation, if applicable;
 - (b) any reporting, periodic or upon request, on the implementation of national anti-corruption and integrity legislation provided by sub-national authorities to competent national bodies;
 - (c) any reports produced by national supervisory bodies on findings made in respect of sub-national authorities' compliance with national anti-corruption and integrity legislation, if available; and
 - (d) any steps and measures at the disposal of national supervisory bodies in case of failure by sub-national authorities to ensure observance of national anti-corruption and integrity legislation (e.g. supervision of legality, sectoral supervision, advisory recommendations, summoning of documents, suspension or annulment of administrative or legal act, temporary placement of a self-governing authority under direct management of the Government etc.).

² Bearing in mind the constitutional framework and the degree of autonomy with regard to responsibilities of sub-national authorities, the ways and means by which those responsibilities are exercised, and the resources required for their fulfilment.

3.2 Should none be applicable, please provide reasons.

3.3 If available, please provide statistical information, for the last five years, regarding complaints about, investigations of, prosecutions for and convictions of criminal offences of corruption committed at the sub-national level.

B. Promoting integrity and preventing corruption at the sub-national level (specifically addressed to each of the two sub-national authorities selected for the evaluation)

4. The sub-national authorities selected for the evaluation

4.1 Please describe the sub-national authority, indicating the legal status, remit of responsibilities, organisation and the relationship with the other sub-national tiers, and also specifying:

- i. the executive body and the rules for its formation (e.g. direct election/appointment of the mayor/the collective executive organ etc.), including any rules on balanced gender representation;
- ii. the representative body and the rules for its formation (method of election, e.g. proportional representation, majority election or appointment), including any rules on balanced gender representation;
- iii. population encompassed by the sub-national authority, including those commuting to/from its geographical area, if available; and
- iv. rules and procedures regulating the relationship between the executive body and the representative body, if appropriate. In particular, please describe: rules on dismissal of one body by another, if applicable; rules on taking decisions that require adoption/approval by both organs; procedure for the examination of such decisions and requisite majorities; power of veto and majority required to overcome veto.

4.2 Please describe how any competences in preventing corruption and promoting integrity are exercised by the sub-national authority, specifying whether they are exclusive competences, delegated competences, and indicate any competences shared with the national authorities, if applicable.

4.3 Please list any associations of sub-national authorities involved in promoting integrity and preventing corruption and describe their number of members. In particular, please state their tasks and role in preventing corruption and promoting integrity (providing examples from the practice) and indicate whether the sub-national authority is a member of any such association(s).

4.4 Please describe the executive body of the sub-national authority, in particular:

- i. the structure (mayor, deputy mayor, president, vice-president, any collective executive body etc.) and the rules for setting up its organisational and administrative structure (directorates, departments, divisions, units, public agencies any municipally-controlled enterprises, etc.), including any rules on balanced gender representation;
- ii. the eligibility criteria to become a politically elected or appointed office-holder of the executive body;
- iii. the number of elected or politically appointed office-holders in the executive body, their remuneration and any additional benefits/allowances, the use of representation funds and other benefits/allowances, and the means for disclosing such information to the public;

- iv. the means for disclosing the names of elected or politically appointed office-holders of the executive body, their areas of responsibility and additional functions to the public, providing examples from the practice;
- v. whether politically elected or appointed office-holders of the executive body undergo any integrity checks prior to or immediately after taking up office as well as during the term of office, providing examples from the practice;
- vi. whether politically elected or appointed office-holders of the executive body may simultaneously hold/exercise any functions in the representative body of the sub-national authority (e.g. president or chairperson of the representative body, etc.) or hold/exercise other functions in the State (national or sub-national level) and non-State sector;
- vii. the grounds for termination of office (e.g. resignation, vote of no-confidence, dismissal by an authorised official/body, commission of a criminal offence, termination of citizenship, appointment/election to a position incompatible with this function etc.);
- viii. the kind of decisions that the executive body may take, specifying whether they may be taken without a vote of the representative body, they may be vetoed and whether they are made public;
- ix. the budget disposed of by the executive body, in particular: (a) the sources of funding, (b) the procedure and process for the receipt of donations, sponsorships, externally funded projects, etc., (c) the procedure for the authorisation of expenses, (d) any impact assessments on the use of and transparency of spending, and (e) findings of audit reports on budgetary spending; and
- x. the number of public officials employed in the executive body.

4.5 Please describe the representative body of the sub-national authority, in particular:

- i. the structure (e.g. chair, bureau, permanent and temporary commissions etc.) and the rules for setting up its organisational and administrative structure (directorates, departments, divisions, units etc.), including any rules on balanced gender representation;
- ii. the eligibility criteria to become a politically elected or appointed office-holder of the representative body;
- iii. the number of elected or politically appointed office-holders in the representative body, their remuneration and any additional benefits/allowances, and the means for disclosing such information to the public;
- iv. the means of disclosing the names of the politically elected or appointed office-holders of the representative body, their areas of responsibility and additional functions, providing examples from the practice;
- v. whether politically elected or appointed office-holders of the representative body undergo any integrity checks prior to or immediately after taking up office as well as during the term of office, providing examples from the practice;
- vi. whether politically elected or appointed office-holders of the representative body may simultaneously hold/exercise any functions in the executive body of the sub-national authority or hold/exercise other functions (e.g. in the State (national or sub-national level) and non-State sectors);
- vii. the grounds for termination of office (e.g. resignation, dissolution of a representative body by an authorised official/body, commission of a criminal

- offence, termination of citizenship, appointment/election to a position incompatible with this function etc.);
- viii. the kind of decisions that the representative body may take, specifying whether they may be subject to a veto and whether they are made public;
- ix. whether the representative body manages a budget of its own, which is distinct from that managed by the executive body; if so, please describe (a) the sources of funding, (b) the procedure and process for the receipt of donations, sponsorships, externally funded projects, etc., (c) the procedure for the authorisation of expenses, (d) any impact assessments on the use of and transparency of spending, and findings of audit reports on budgetary spending; and
- x. the number of public officials employed in the representative body.

4.6 Please describe the regulatory framework for the recruitment, promotion and dismissal of public officials employed in the executive body and representative body of your sub-national authority, specifying whether they are regulated by national legislation exclusively and/or rules and regulations adopted by your sub-national authority and providing relevant text(s). Also, please indicate how the rules and procedures in place seek to ensure fair, open and transparent recruitment, remuneration, promotion and dismissal of public officials, including any safeguards against nepotism, political allegiance or any other improper motives.

4.7 Please indicate whether any integrity checks are in place when recruiting public officials, providing examples from the practice. Also, please specify whether any integrity checks are carried out on a regular basis, during the course of employment.

4.8 Please indicate (i) the average gross annual salary in the geographical area of the sub-national authority for both public and private sectors and (ii) the average salary/remuneration levels of public officials recruited by the sub-national authority for:

- entry-level positions;
- middle management positions;
- upper/senior management positions; and
- any additional benefits/allowances.

Please describe the regulatory framework regarding remuneration of public officials and the means for disclosing such information to the public.

5. *Anti-corruption /integrity policies and risk-assessment*

5.1 Does the sub-national authority have an anti-corruption / integrity strategy (or other anti-corruption/integrity policy document) in place? If yes, please provide texts of the relevant document.

5.2 Is the implementation of the anti-corruption / integrity strategy (or other anti-corruption/integrity policy document) subject to periodic evaluation? If yes, who carries out such evaluation (e.g. the sub-national authority itself, an independent body etc.)? Please provide text(s) or summaries of findings of any latest reports of such evaluations.

- 5.3 Does the sub-national authority periodically carry out integrity risks assessments? If yes, please provide a copy thereof, indicating:
- i. the process for conducting integrity risks assessments, explaining the procedure for detecting and identifying integrity risks, adopting, evaluating and reviewing such risks assessments;
 - ii. the high-risk areas identified by such risk assessments (e.g. disposing of the budget, public procurement, urban planning and development, provision of public services, municipally-controlled enterprises, etc.), specifying the proposed risk management measures and the control/monitoring mechanisms to prevent and detect the occurrence of identified integrity risks; and
 - iii. the existence of a mechanism for assessing the integrity risks of third parties, namely contractors, service providers and partners.
- 5.4 Does the sub-national authority contribute to the implementation of an anti-corruption / integrity policy and/or strategy adopted at the national level? If yes, please explain through what measures and actions, and provide text(s) of any relevant available reports.

6. Integrity rules, codes of conduct/ethics, training, confidential counselling

- 6.1 Has a code of conduct/ethics been adopted in respect of the executive body, the representative body and public officials of the sub-national authority? If yes, please provide full text(s) and state which persons are covered by the codes of conduct/ethics. Since when have they been in force, who drafted and adopted them? Are such codes of conduct/ethics made public?
- 6.2 What is the legal status of such codes of conduct/ethics and are they enforceable? What is their relationship with the relevant criminal law provisions on corruption offences?
- 6.3 What are the persons and/or bodies responsible for ensuring their application in practice?
- 6.4 If such codes are enforceable, please provide examples and statistics (by gender, if possible) for the last five years on any breaches established, sanctions applied and the persons concerned, as relevant. Conversely, if such codes are not enforceable, please indicate whether any breaches thereof give rise to liability on the part of the wrongdoer.
- 6.5 Please specify whether any information and training are provided to the executive body, the representative body and public officials in the sub-national authority regarding matters covered under section 6 of the Questionnaire. If so:
- i. please, indicate by whom, at which stage and how often such information and training is provided; and
 - ii. if available, please provide annual statistical information for the last five years indicating the number of persons benefiting from information and training regarding matters covered under section 6 of the Questionnaire.
- 6.6 Please describe any body or mechanism responsible for promoting integrity and preventing corruption in the sub-national authority. Also, please describe its organisation and status, including, but not limited to, its role in respect of: (i) raising awareness

regarding anti-corruption and integrity framework within the sub-national authority, (ii) proposing improvements to anti-corruption and integrity framework and (iii) addressing issues of concern within the sub-national authority.

6.7 Please describe whether any confidential counselling is made available for politically elected or appointed officeholders and public officials, and how.

7. Conflicts of interest

7.1 Please describe the general rules and procedures in place concerning the prevention and resolution of conflicts of interest in respect of the executive body, the representative body and public officials of the sub-national authority, providing the text(s) of relevant rules and indicating in particular:

- i. definition(s) and/or types of conflicts of interest applicable;
- ii. persons to whom these definitions apply;
- iii. mechanisms aimed at preventing conflicts of interest (e.g. ad hoc declaration of potential or actual conflict of interest, obligation to recuse or refrain from participation in a matter where a perceived or actual conflict of interest occurs etc.);
- iv. procedures for identifying and resolving conflicts of interest;
- v. whether conflicts of interest and their solutions are documented and disclosed to the public; and
- vi. sanctions for breaches of the conflicts-of-interest rules.

7.2 If available, please provide any examples and statistics (by gender, if possible) for the last five years regarding declarations of conflicts of interest, recusals, any breaches of these rules, as well as sanctions applied.

8. Incompatibilities, prohibitions or restrictions of certain activities

8.1 Please specify whether a regulatory framework describes incompatibilities with the performance of functions of:

- i. politically elected or appointed office-holders of the sub-national authority; and
- ii. public officials of the sub-national authority

and specify any posts, positions and activities considered incompatible.

8.2 Please specify by which person/body and at what stage incompatibilities are verified and, if detected, how they are remedied. Please indicate possible consequences of not resolving a situation of incompatibility by an elected or appointed office-holder or a public official.

8.3 Please describe any rules or measures in place prohibiting or restricting the exercise of outside activities in the public or private sector, whether remunerated or not by:

- i. politically elected or appointed office-holders of the sub-national authority; and
- ii. public officials of the sub-national authority.

8.4 Please describe any rules or measures in place prohibiting or restricting the holding of financial interests (e.g. shares, bonds, notes, etc.) by:

- i. politically elected or appointed office-holders of the sub-national authority; and
- ii. public official of the sub-national authority.

8.5 Please provide:

- i. any legal provisions in place, limiting employment in the non-public sector of politically elected or appointed office-holders of the sub-national authority upon departing office (i.e. post-employment restrictions);
- ii. whether similar limitations exist for public officials working for the sub-national authority;
- iii. any requirements to seek prior approval of and/or report planned or current activities if or upon leaving office;
- iv. possible consequences for not complying with the post-employment restrictions; and
- v. any statistics (by gender, if possible) for the last five years regarding information on any breaches of rules and sanctions applied.

8.6 Please provide:

- i. whether any rules are in place regarding the acceptance of gifts or other advantages, including in-kind benefits, services and hospitality that politically elected or appointed office-holders and public officials of the sub-national authority must comply with in the course of their duties (e.g. definition of gifts and other benefits, rules on acceptance or non-acceptance, any value thresholds, and the procedures for disposing of or returning unacceptable gifts);
- ii. whether a register of gifts received and reported by politically elected or appointed office-holders and public officials is made available to the public, providing examples from the practice;
- iii. whether any breaches of these rules envisage sanctions, and if yes, indicate all applicable sanctions; and
- iv. any examples and statistics (by gender, if possible) for the last five years regarding information on gifts or other advantages declared, any breaches of rules on gifts, as well as sanctions applied.

8.7 Please provide:

- i. whether any rules are in place regarding entering, either directly or through a business interest, into contracts with the sub-national authority applicable to politically elected or appointed office-holders and public officials of the sub-national authority;
- ii. whether any breaches of these rules envisage sanctions, and if yes, indicate all applicable sanctions; and
- iii. any examples and statistics (by gender, if possible) for the last five years regarding breaches of these rules, as well as sanctions applied.

8.8 Please provide:

- i. whether any rules are in place regarding the (mis)use of confidential information and the (mis)use of public resources that politically elected or appointed office-holders and public officials of the sub-national authority must comply with in the course of their duties.

- ii. whether any breaches of these rules envisage sanctions, and if yes, indicate all applicable sanctions; and
- iii. any examples and statistics (by gender, if possible) for the last five years regarding breaches of these rules, as well as sanctions applied.

9. Declarations of assets, liabilities and interests

9.1 Please indicate whether any rules are in place requiring politically elected or appointed office-holders and public officials (specify, as appropriate) to declare assets, interests and liabilities indicating, in particular, the following:

- i. assets and financial interests;
- ii. sources of income (earned income, income from investments etc.);
- iii. liabilities (loans, debts etc.);
- iv. posts, functions or engagement in outside activities, whether in the State (public) or non-State (public) sector, remunerated or not;
- v. business contracts with State authorities;
- vi. offers of remunerated or non-remunerated activities, including agreements concerning such future activities;
- vii. any other interest or relationship that could give rise to a conflict of interest.

9.2 Please indicate whether such declarations should also include relevant information as regards the partner and dependent family members of the declaring person.

9.3 Please also specify the following:

- i. when declarations are to be made and what time period they should cover;
- ii. to whom/what body the information is to be declared;
- iii. whether there is a register of declarations submitted and what information is kept in the register; and
- iv. whether declarations are made public.

9.4 Please provide details of officials/bodies in charge of reviewing and verifying the accuracy and completeness of information submitted in declarations, including:

- i. official(s) or body(ies) responsible for reviews and verifications, indicating their composition, as appropriate;
- ii. body(ies) to which he/she/they are accountable;
- iii. review and verification procedure;
- iv. sanctions and measures available for submitting incomplete or inaccurate information.

9.5 Please indicate whether the rules regarding the obligation to file declarations of assets, liabilities and interests are applicable to politically elected or appointed office-holders and public officials of all sub-national authorities belonging to the same tier or whether they are limited to certain sub-national authorities having a given number of population. If so, please indicate the threshold of population set down by law.

10. Transparency, access to information, participation and accountability

10.1 Please describe the rules and procedures in place regarding access to official information, indicating, in particular:

- i. applicable rules regarding access to official information held by the sub-national authority, including examples from the practice;
- ii. whether the sub-national authority is required to publish proactively any public-interest related official information, such as on budgeting, policy making, decision making, contracting, service delivery, etc., and in particular open data;
- iii. whether any official information and/or decisions adopted by the executive body and representative body of the sub-national authority is classified (e.g. restricted or confidential) and on what grounds; if yes, please indicate the basis/circumstances on/under which they can be made public/disclosed to the public (e.g. general public interest, request of a party having a legitimate interest in the matter, lapse of time during which a document was classified, court decision etc.); and
- iv. any training activities organised to raise awareness on the importance of transparency and access to information.

10.2 Please describe the transparency of the policy-making and decision-making process in the executive and representative bodies of the sub-national authority, as well as the process for the involvement and participation of the public, indicating, in particular:

- i. the level of transparency regarding substantiation of policies, decisions, rules and regulations adopted by the executive body, as well as deliberations and debates regarding policies, decisions, rules and regulations adopted by the representative body (e.g. openness of meetings and deliberations and the procedure allowing the public to follow the decision-making process, any accreditation required for the media representatives and the public to attend meetings, consult the agenda in advance etc.);
- ii. at what stage of the policy-making and decision-making process and by what means are matters under examination brought to the attention of the public; and
- iii. whether, how and when public consultations on matters under examination are carried out, including any public consultations on the delivery of public services or evaluation of the implementation of major contracts;

10.3 Also, please provide:

- i. whether any rules are in place regarding the obligation of politically elected or appointed office-holders and public officials of the sub-national authority to disclose contacts with lobbyists or other third parties (e.g. interest groups, unions, NGOs, etc.), who aim to influence decision-making ;
- ii. whether any breaches of these rules envisage sanctions, and if yes, indicate all applicable sanctions; and
- iii. any examples and statistics (by gender, if possible) for the last five years regarding breaches of these rules, as well as sanctions applied.

10.4 Please specify whether the sub-national authority has an internal official/body in charge of ensuring compliance of politically elected or appointed office-holders and public officials with the legislation and regulations in force in connection with the items covered

in Sections 4-10. If yes, please provide details regarding this official/body, indicating the mandate, composition (where relevant), and *modus operandi*.

10.5 Please indicate whether the sub-national authority has an internal control/audit. If so, please provide a description of its tasks and competences as well as any reports that may have been issued in connection with the items covered in Sections 4-10. Also, please describe the guarantees for ensuring the operational independence of the internal control/audit, the follow-up given to its reports and by whom.

10.6 Please specify whether the sub-national authority is/may be subject to external control/audit. If yes, please indicate whether such external controls/audits have taken place in the last five years and share any relevant reports or extracts/summaries.

10.7 Please specify whether the sub-national authority has conducted/commissioned an independent/social audit in the last five years. If yes, please share any relevant report(s).

10.8 Please describe possibilities for administrative review of the decisions taken by the sub-national authority, including relevant legislation and procedure.

10.9 Please describe possibilities for judicial review of the decisions taken by the sub-national authority, including relevant legislation and procedure.

11. Disclosure of corruption and integrity violations, non-criminal and criminal sanctions and enforcement

11.1 Please specify whether and how the public may file complaints or report (suspected) corruption, misconduct, or breach of the code of ethics committed by politically elected or appointed office-holders and public officials.

11.2 Please specify whether politically elected or appointed office-holders and public officials are under an obligation to report (suspected) corruption, misconduct, breach of the code of ethics, which they come across in the course of their duties? Please indicate in particular:

- i. to which official/body such reports are to be made;
- ii. reporting lines and procedures;
- iii. sanctions applicable for failure to report.

11.3 Please provide information on the protection measures available for whistleblowers reporting (suspected) corruption or other related misconduct, indicating in particular:

- i. regulatory framework;
- ii. existence of whistleblowing system(s);
- iii. persons who may file a whistleblower report;
- iv. officials/bodies to which reports may be made and provision of any training to such officials/bodies;
- v. processing, including the investigation, of a whistleblower report;
- vi. safeguards in place for the protection against various forms of retaliation against whistle-blowers and ensuring their implementation in practice;

- vii. any assessment of the quality and effectiveness of the whistleblowing system;
- viii. any statistics regarding the number of reports filed per year.

11.4 Please describe any non-criminal enforcement mechanisms in place regarding violations of the rules on integrity and ethics, conflicts of interest and related prohibitions/restrictions and declaration requirements by the politically elected or appointed office-holders and public officials of the sub-national authorities indicating in particular:

- i. officials or body(ies) responsible for carrying out the relevant proceedings and their composition;
- ii. bodies/authorities they are accountable to;
- iii. resources at its/their disposal;
- iv. procedures followed;
- v. grounds for initiating proceedings (e.g. complaints by citizens, colleagues, whistleblowers, news in the media etc.) and the manner of conducting investigations;
- vi. modalities for taking decisions (e.g. majority required, where relevant);
- vii. sanctions and measures applicable.

11.5 Please provide examples and statistics (by gender, if possible) for the last five years of any politically elected or appointed office-holders and public officials being removed on grounds of corruption or integrity-related misconduct, or cases where such public accusations were followed by resignation.

11.6 Please indicate, in the context of criminal proceedings, to what extent politically elected or appointed office-holders and public officials of the sub-national authorities are subject to:

- i. immunities or other procedural privileges;
- ii. special criminal proceedings, different from those applicable to other citizens and, if so, describe the differences.

11.7 Please provide examples and statistics (by gender, if possible) for the last five years of any politically elected or appointed office-holders and public officials at the sub-national level being charged, indicted, prosecuted and convicted for corruption offences, indicating the offences in question, sanctions imposed by court and whether they were effectively enforced.

12. Innovations and good practices

12.1 Please describe any novel developments and innovations as well as good practices implemented by the sub-national authority to prevent corruption and promote integrity, providing examples thereof.