



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

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

FIFTH EVALUATION ROUND REPORT

SUMMARY

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

TÜRKIYE

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The publication of Evaluation and Compliance Reports shortly after their adoption is a long-standing practice among GRECO member States. This serves two important purposes: ensuring overall transparency of the GRECO process and facilitating the implementation of recommendations at domestic level by raising awareness of GRECO's findings across society.

The Fifth Round Evaluation Report on Türkiye was adopted by GRECO at its 95th plenary meeting (27 November - 1 December 2023) and the authorities were invited to authorise, as soon as possible, its publication, to translate it into the national language and make the translation public. Since then, confidentiality of the report has not been lifted.

At its 102nd plenary meeting (27 March 2026), GRECO decided that, pursuant to Rule 35, paragraph 2 of the Rules of Procedure, and in the absence of authorisation from the authorities to publish the entire report, a summary of the report be made public within six months from its adoption. Accordingly, this summary is made public on 1 June 2026.

The following contains the executive summary and the recommendations and follow-up of the Fifth Round Evaluation Report on Türkiye ¹.

¹ GrecoEval5Rep(2022)10.

EXECUTIVE SUMMARY

1. This report evaluates the effectiveness of the framework in place in Türkiye to prevent corruption amongst persons with top executive functions (the President of the Republic, the Vice-president, the Head of the Directorate of Administrative Affairs of the Presidency, the Chief adviser and advisers to the President, ministers, deputy ministers and minister counsellors, hereafter “PTEFs”) and members of the Police and Gendarmerie. It aims to identify weaknesses that need to be addressed and positive developments that should be sustained with a view to assisting the authorities of Türkiye in strengthening their efforts for preventing corruption.
2. The political and institutional context of this evaluation reflects the constitutional amendments introduced in 2018. These constitutional amendments provided for a strong presidential/executive system. The checks and balances mechanism in place is not sufficiently robust to deal with increased powers of the president/executive provided by these constitutional amendments.
3. The normative framework for preventing and fighting corruption among PTEFs is limited to non-exhaustive integrity-related rules disseminated in several laws. There is no global strategy or action plan against corruption, and the existing anti-corruption legislation is generic and not structured to fully encompass the responsibilities of PTEFs and the specific corruption risks to which they are exposed. Responsibility for investigating corruption, where it exists, is fractured and limited. Principles of ethical behaviour were developed in 2005 for public officials, but do not cover PTEFs above the rank of deputy ministers. The State Supervisory Council, which is attached to the Office of the President of the Republic, can carry out administrative inspections, but lacks independence and operates without the necessary transparency.
4. Specific attention should be paid to PTEFs considering their executive powers, or proximity to the exercise of these powers, and the specific corruption risks to which they are exposed by adopting a devoted policy document covering the Presidency and the Presidential Cabinet. In order to prevent risks of conflicts of interest in the Executive, integrity checks should be carried out as part of appointment procedures. For the purpose of greater transparency and owing to their role in the decision-making process, the names and area of competence of all advisers to the President of the Republic and minister counsellors should be made public and easily accessible. More generally, clear guidance regarding conflicts of interest and other integrity related matters should be developed in a code of conduct for PTEFs, accompanied by proper monitoring and enforcement mechanism. In connection with these standards, systematic and regular briefing and training of PTEFs should be organised. Rules on how PTEFs engage in contacts with lobbyists and other third parties who seek to influence Governmental decision-making should also be introduced. Finally, the Ethics Council’s remit should be widened to cover all PTEFs. It should be further enhanced and its independence strengthened, in particular by granting it its own budget and secretariat.
5. As regards access to information, the legislation governing freedom of information should be reviewed, with a particular focus on the scope of exceptions, the application of these exceptions in practice and the enforcement of the legislation. In this field, an effective mechanism overseeing the implementation of the legislation should be in place, with the power to issue binding decisions.

6. Moreover, the provisions regulating the acceptance of gifts should be more precise and there should be a system for declaring and registering gifts received by all PTEFs in connection with their functions. Post-employment restrictions rules should apply across the board to all PTEFs. Declarations of asset of PTEFs should systematically, and at regular interval, be assessed in depth given their role in decision-making at the very top of the Executive and all declarations should be made systematically, easily and publicly accessible online for transparency and accountability purposes. Finally, a key factor for increasing public trust would be to prevent impunity at the top executive level by reviewing the system of immunities.

7. The Police and the Gendarmerie are both under the authority of the Ministry of the Interior and share the same missions, but in different geographical areas. While they are bodies of the Executive, a clear demarcation is required between policy powers and their operational independence. Appointments to senior professional positions within the law enforcement authorities are conducted with no transparency and involve exclusively political bodies. In addition, the legislation and practice do not provide for transparent promotion procedures. As law enforcement authorities should preferably be representative of society as a whole, much more needs to be done to significantly improve the balance between men and women in the police and gendarmerie forces.

8. To ensure that all the law enforcement officers are focused on the need to prevent and fight corruption and demonstrate the authorities' zero tolerance to corruption, the legislation needs to be completed by a specific anti-corruption strategy. In addition, consolidated tailor-made ethical rules applicable to each of the law enforcement branches should be drafted and supplemented with practical guidance, training and awareness raising, as well as confidential counselling. Moreover, the management of conflicts of interest within the Police / Gendarmerie needs to be strengthened, including through responsive advisory, monitoring and compliance mechanisms. The over-complexity of the internal system for controlling the activity of the law enforcement authorities may prove to be counterproductive for its purpose as a result of duplication and hierarchical structures. A genuine independent mechanism for complaints against the Police and the Gendarmerie, as well as a solid whistleblowing policy, should be established.

RECOMMENDATIONS AND FOLLOW-UP

1. In view of the findings of the present report, GRECO addresses the following recommendations to Türkiye:

Regarding central governments (top executive functions)

- i. **laying down rules requiring that integrity checks take place prior to the appointment of Vice-president(s), ministers, deputy ministers, minister counsellors and advisers to the President as well as the Head of the Directorate of Administrative Affairs in order to identify and manage possible risks of conflicts of interest (paragraph 38);**
- ii. **that the names and area of competence of all advisers to the President of the Republic and minister counsellors be made public and easily accessible (paragraph 39);**
- iii. **that (i) a risk assessment specifically targeting persons with top executive functions be carried out and include particular steps to mitigate risks identified in respect of them and (ii) an operational corruption**

prevention action plan covering the Presidency and the Presidential Cabinet be adopted on this basis and made public (paragraph 54);

iv. that (i) a code of conduct applicable to persons with top executive functions (Vice-president(s), ministers, deputy ministers, the Head of the Directorate of Administrative Affairs, advisers and minister counsellors) be adopted and made public in order to provide clear guidance regarding integrity related matters (such as conflict of interest, incompatibilities, gifts, contacts with lobbyists and third parties, post-employment restrictions, asset declarations, confidential information, etc.); (ii) proper monitoring and enforcement of such a code by a statutorily independent body be ensured; and (iii) an appropriate document on conduct be developed for the President of the Republic (paragraph 60);

v. that the composition of the State Supervisory Council be made fully transparent and that its findings in relation to corruption and the prevention thereof be published in an accessible format, without jeopardising its investigations and the integrity of persons concerned (paragraph 63);

vi. (i) to strengthen the independence and authority of the Council of Ethics for the Public Service; (ii) to provide it with its own financial and personnel resources to effectively perform its tasks; and (iii) to ensure that its competence is broadened as to cover all persons with top executive functions (paragraph 72);

vii. that (i) briefing and training on integrity issues be systematically organised and administered for all persons with top executive functions upon taking up their positions, and regularly thereafter, and (ii) confidential counselling on integrity related matters be established and made accessible to them (paragraph 77);

viii. to (i) revise the Law on the Right to Information so that exceptions to the rule of public disclosure are interpreted and applied more specifically and narrowly, in order to improve public access to information; and (ii) ensure that an independent oversight mechanism is in place to guarantee the effective implementation of the freedom of information legislation (paragraph 88);

ix. that public consultations be effectively ensured in practice in respect of draft legislation prepared by the Executive and that only specific and limited exceptions to this rule be made possible and clearly regulated (paragraph 92);

x. that (i) rules be introduced on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence the government's legislative and other activities; and (ii) sufficient information about the purpose of these contacts be disclosed, such as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion (paragraph 95);

xi. that a requirement of ad hoc disclosure be introduced in respect of all persons with top executive functions in situations of conflicts between their private interests and official functions, as they occur (paragraph 105);

xii. establishing a more robust set of rules on gifts and other benefits for all persons with top executive functions, by lowering significantly the thresholds for accepting, declaring and recording gifts and ensuring that gifts registers are accessible to the public (paragraph 115);

xiii. that (i) specific post-employment restrictions rules be made applicable to all persons with top executive functions, including the President, Vice-president and ministers; (ii) an effective enforcement mechanism regarding these rules be implemented, and (iii) rules on persons with top executive functions expressly prevent lobbying activities towards the government for a lapse of time after they leave government (paragraph 123);

xiv. that the system of asset declarations for persons with top executive functions be strengthened by ensuring that (i) all declarations are made systematically, easily and publicly available promptly after their

submission (it being understood that information concerning spouses and dependent family members would not necessarily need be made public), and (ii) these declarations be subject to regular substantive checks, with effective, proportionate and dissuasive sanctions in case of breach (paragraph 136);

xv. reforming the system of lifting immunities by Parliament in order to provide for speedier proceedings, based on objective criteria in a way that does not hamper or prevent criminal investigations and prosecution in respect of persons entrusted with top executive functions suspected of having committed corruption related offences (paragraph 146);

xvi. that the system of administrative permission for prosecution be abandoned (paragraph 147);

Regarding law enforcement authorities

xvii. that (i) sufficient operational independence of the Police / Gendarmerie vis-à-vis the Presidency of the Republic and the Ministry of the Interior be ensured in practice, to avoid undue influence, and that (ii) pertinent complementary measures be taken in order to ensure individual officers' duty to comply with the existing rules on integrity and impartiality in order to carry out their functions in a neutral manner in practice (e.g. through awareness, training, sanctions etc.) (paragraph 163);

xviii. that specific legislative measures be taken to frame and monitor donations of monetary value which could be received by the Police and the Gendarmerie in order to provide that (i) proper safeguards for law enforcement authorities' independence against possible conflicts of interest are in place and (ii) donations received are published on a regular basis, including online, indicating the nature and value of each donation, as well as the donor's identity (paragraph 166);

xix. that the existing prohibition on Police and Gendarmerie personnel from being a member of a trade union be reconsidered (paragraph 173);

xx. that (i) the Police and Gendarmerie conduct a dedicated risk assessment of corruption-prone areas and activities to identify problems and emerging threats, and that (ii) the data gathered are used for the proactive design of a tailor-made integrity and anticorruption strategy, which is made known to all law enforcement officers (paragraph 178);

xxi. that (i) a dedicated code of ethics for the Police and for the Gendarmerie (a joint code or separate codes) be adopted to cover integrity matters (e.g. various situations of conflict of interest, secondary activities, gifts, contacts with third parties, outside activities, confidential information, etc.), and be made public, (ii) it be supplemented with practical guidance and concrete examples illustrating issues and prone-risk areas, as well as training and awareness raising, and that (iii) it be accompanied by a mechanism for oversight and enforcement (paragraph 185);

xxii. that confidential counselling to individual police and gendarmerie staff on ethics and integrity matters be provided (paragraph 193);

xxiii. that the vacancy for the position of Director General of Security be subject to clear rules and public advertisement and that promotion procedures for all other senior positions in the Police and Gendarmerie be subject to clear rules and appropriate transparency (paragraph 206);

xxiv. that a strengthened pro-active policy be put in place, aimed at improving significantly the balance between men and women within the Police and the Gendarmerie in all functions (paragraph 217);

xxv. that an organisational policy and practices be developed to improve the management of conflicts of interest in the Police and the Gendarmerie, including through reporting, registering, monitoring and compliance mechanisms (paragraph 221);

xxvi. that a more robust set of rules and guidelines on gifts and other benefits for staff of the Police and the Gendarmerie is established, including an obligation to report and, as appropriate, to register gifts (paragraph 225);

xxvii. that a study be conducted on the practice of post-employment activities of law enforcement officers with a view to adopting rules in this area, if needed (paragraph 230);

xxviii. that the control mechanisms for wrongdoing in the law enforcement be revised, with the aim to provide for a less complex system for internal control and oversight of the Police and the Gendarmerie, and to strengthen the transparency and the efficiency of the control system (paragraph 245);

xxix. that an independent external mechanism specifically aimed at complaints against the Police and the Gendarmerie be set up (paragraph 254);

xxx. that an obligation for law enforcement officers be established to report corruption related misconduct within the service and that whistleblower protection measures within the Police and Gendarmerie be developed and implemented (paragraph 256);

xxxi. that the disciplinary regime of the Police and the Gendarmerie is revised with a view to excluding any possibility of a hierarchical superior deciding on disciplinary matters single-handedly (paragraph 263);

xxxii. that statistics regarding corruption-related criminal or disciplinary proceedings involving law enforcement officers be made public, including information on complaints received and proceedings instituted, sanctions imposed, including possible dissemination of relevant case-law, while respecting the anonymity of the persons concerned (paragraph 266).

2. Pursuant to Rule 30.2 of the Rules of Procedure, GRECO invites the authorities of Türkiye to submit a report on the measures taken to implement the above-mentioned recommendations by 30 June 2025. The measures will be assessed by GRECO through its specific compliance procedure.

The adoption of the present summary does not in any way substitute for the publication of the full 5th Round Evaluation Report. GRECO therefore invites the authorities of Türkiye to authorise its publication as soon as possible.