



Strasbourg, 14 March 2025

GrecoEval6(2025)3

## **Training for Evaluators**

### **Sixth Evaluation Round on *Preventing corruption and promoting integrity at the sub-national level* (Strasbourg, 20-21 March 2025)**

## **Final Programme**

## Context

GRECO<sup>1</sup> is launching its Sixth Evaluation Round in 2025 on the theme of preventing corruption and promoting integrity at the sub-national level. GRECO adopted the Questionnaire in March 2024, which will be used to gather information prior to the on-site visits.

Due to the important role that sub-national authorities play in national democracies, preventing corruption and promoting integrity at the sub-national level is of paramount importance to ensure the quality of governance and accountability of decentralised governments. Bearing in mind each member state's constitutional set-up<sup>2</sup> and based on a dialogue with the Member State concerned, two sub-national authorities will be identified for evaluation. They will include (i) a capital or another large city; (ii) a regional or other sub-national authority or a municipality, in particular, in respect of countries having only one sub-national tier. They should be selected, inter alia, on the basis of the following criteria: they are mandated to spend public money and/or to manage finances on an executive basis; they are directly elected and/or have a mandate separate from that of central government; and they deliver a broad range of government services to citizens.

GRECO's evaluation in this round focusses on two main areas. Firstly, it aims to obtain a comprehensive understanding of the competencies, mechanisms, and responsibilities of national authorities regarding the promotion of integrity and prevention of corruption at the sub-national level, where applicable (Part A of the Questionnaire). Secondly, the evaluation aims at providing an in-depth analysis of 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 (Part B of the Questionnaire).

Evaluators are expected to possess adequate expertise in the prevention of corruption and promotion of integrity in public bodies and/or the organisation, functioning, and management of sub-national authorities. The training aims to advance the evaluators' expertise in GRECO's working methods and procedures, the modus operandi of on-site visits, and the contribution expected from them. Transversal discussions in plenary sessions will be complemented by breakout group sessions focussing on practical interactive exercises to allow discussing in greater detail key issues at stake, as well as relevant standards and reference materials (see list of Working Documents).

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<sup>1</sup> The Group of States against Corruption (GRECO) was established in 1999 under the aegis of the Council of Europe and is currently composed of the 46 Council of Europe member states, Kazakhstan and the United States of America. Its task is to monitor, on the basis of mutual evaluation and peer pressure which involve on-site visits, the implementation of the various anti-corruption instruments adopted since 1997. These instruments cover both preventive and repressive policies and address corruption in the public and private sector, domestically and transnationally, in line with the Council of Europe's Programme of Action against Corruption of 1996. In order to implement such an ambitious and multidisciplinary approach, the successive evaluation rounds have been focusing on specific topics, including: the institutional capacity to deal with corruption; incriminations of corruption; transparency and supervision of party financing; preventive mechanisms applicable to parliamentarians, judges and prosecutors; preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies.

<sup>2</sup> In this context, the term "constitutional set-up" is to be understood as meaning a country's constitution, practice and specificities.

- 9.00 – 09.30 Registration of participants

Plenary session

- 09.30 – 10.00 Welcome address, presentation of the training
- Hanne Juncher, *Director of Security, Integrity and Rule of Law*
  - David Meyer, *GRECO President*

**1. Focus of the Sixth Evaluation Round and Methodology for the Evaluation, lessons learnt from previous evaluation rounds**

- 10.00 – 11.00 Presentation and panel discussion

Moderator: Laura Sanz-Levia, *GRECO Deputy Executive Secretary*

Presentations by:

- Laura Sanz-Levia, *GRECO Deputy Executive Secretary*
- Vita Habjan Barboric, *Head of the Development and Prevention Centre Commission for the Prevention of Corruption, Slovenia*
- Luis Miguel Pinto De Sousa E Silva, *Chief Inspector, General Inspection of Finance Audit Authority (IGF), Portugal*
- David Dolidze, *GRECO Senior Legal Adviser*

11.00 – 11.30 Coffee break

**2. Addressing and managing risk areas (risk mapping, particular risk areas at sub-national level, devising strategies and their follow-up)**

- 11.30 – 13.00 Presentation and panel discussion

Moderator: António Delicado, *GRECO Vice-President*

Presentations by:

- Giuseppe Abbatino, *Expert, National Anti-Corruption Agency (ANAC), Italy*
- Yann Philippe, *Head of Department, French Anti-Corruption Agency (AFA), France*
- Gissur Erlingsson, *Professor, Linköping University, Sweden*
- Danela Arsovska, *Major of Skopje, North Macedonia, Spokesperson on Ethics and Prevention of Corruption of the Congress of Local and Regional Authorities of the Council of Europe*

13.00 – 14.30 Lunch break

- 14.30– 15.30 Breakout sessions (Clearville mock evaluation)

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| <p>A mock evaluation of a risk area (e.g. public procurement, conflict of interest implications, transparency, etc.) in a sub-national authority (Clearville): possible recommendations and good practice examples</p>  | <p>Group A (room 200, Pharmacopoeia, <i>French only</i>)<br/> Group B (room G03, <i>English only</i>)<br/> Group C (room G01, <i>English only</i>)<br/> Group D (room G04, <i>English only</i>)</p> |
| <p>15.30 – 16.00 <i>Coffee break</i></p> <p><u>Plenary session</u> (room G03)</p> <p>Moderators: Stephane Leyenberger, <i>GRECO Senior Legal Adviser</i><br/> Giulia Giardino, <i>GRECO Junior Legal Officer</i></p> <p>► 16.00 – 17.00: Presentation of findings and recommendations by the four groups followed by discussion</p> |   |

| <p>Friday, 21 March 2025<br/> Day Two (Agora, room G03)</p>   |
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| <p><b>3. Preventing corruption: building an ethical infrastructure, transparency and control mechanisms</b></p> <p>► 9.30 – 11.00 Presentation and panel discussion</p> <p>Moderator: Sorin Tănase, <i>GRECO Bureau Member</i><br/> Presentations by:</p> <ul style="list-style-type: none"> <li>– Vladimir Georgiev, <i>former Commissioner, State Commission for the Prevention of Corruption, North Macedonia</i></li> <li>– Ashley Cooks, <i>Director of Government Ethics District of Columbia, United States of America</i></li> <li>– Joan-Antoni Llinares Gomez, <i>Former Director of the Agency for the Prevention and Fight against Fraud and Corruption of the Valencian Region, Spain</i></li> </ul> <p>11.00– 11.30 <i>Coffee break</i></p> <p><b>4. Reporting corruption and assuring accountability for integrity breaches</b></p> <p>► 11.30 – 13.00 Presentation and panel discussion</p> <p>Moderator: Alexia Kalispera, <i>GRECO Bureau member</i><br/> Presentations by:</p> <ul style="list-style-type: none"> <li>– Anna Myers, <i>Executive Director, Whistleblowing International Network (WIN)</i></li> <li>– Anca Jurma, <i>Former Counsellor of the Chief prosecutor, National Anti-Corruption Directorate, Romania</i></li> <li>– Luis Macedo Pinto de Sousa, <i>Professor, Lisbon University, Portugal</i></li> </ul> |

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| 13.00 – 14.30 Lunch break   |  |
| ▶ 14.30 – 15.30 <u>Breakout sessions (Clearville mock evaluation)</u>   |  |
| A mock evaluation of a whistleblower case in a sub-national authority (Clearville) Possible recommendations and good practice examples  | Group A (room 200, Pharmacopoeia, <u>French only</u> )<br>Group B (room G03, <u>English only</u> )<br>Group C (room G01, <u>English only</u> )<br>Group D (room G04, <u>English only</u> ) |
| 15.30 – 16.00 Coffee break  |  |
| <u>Plenary session</u> (room G03)<br><br>Moderators: David Dolidze, <i>GRECO Senior Legal Adviser</i><br>Giulia Giardino, <i>GRECO Junior Legal Officer</i><br><br>▶ 16.00 – 17.00 Presentation of findings and recommendations by the four groups followed by discussion<br><br>▶ 17.00 – 17.15 Follow-up/satisfaction survey and future training needs<br><br>▶ 17.15 – 17.30 Final remarks and closure of the training<br><br>– Livia Stoica Becht, <i>GRECO Executive Secretary</i> |  |

## Reading material prior to training

1. [Questionnaire](#) for the 6th Evaluation Round
2. GRECO's [Rules of Procedure](#)
3. Guidelines for Evaluators, including the [Council of Europe Code of Conduct](#), Council of Europe [Policy on reporting wrongdoing and protection from retaliation](#) (Speak Up), and the Council of Europe [Policy on Respect and Dignity](#)
4. Guidelines/time schedule for the organisation of evaluation visits
5. List of reference texts, background and resources

The following list of reference texts includes:

- Council of Europe standards, setting the basis for the Sixth Evaluation Round;
- Other resources and background for GRECO evaluators and other persons involved in the evaluation procedure, which, where useful, and as applicable, may be referred to in evaluation reports.

### 5.1 Council of Europe standards

#### General instruments

- [Committee of Ministers' Resolution \(97\) 24 on the twenty guiding principles for the fight against corruption](#).
- [Recommendation R \(2000\) 10 of the Committee of Ministers to member States on codes of conduct for public officials](#).
- [Recommendation 1908 \(2010\) of the Parliamentary Assembly on Lobbying in a democratic society \(European code of good conduct on lobbying\)](#).
- [Recommendation CM/Rec\(2017\)2 of the Committee of Ministers to member States on the legal regulation of lobbying activities in the context of public decision making](#) and its [Explanatory Memorandum](#).
- [Recommendation CM/Rec\(2014\)7 of the Committee of Ministers to member States on the protection of whistleblowers](#) and its [Explanatory Memorandum](#).
- [Recommendation \(2019\)3 of the Committee of Ministers to member States on supervision of local authorities' activities](#).
- [Recommendation CM/Rec\(2022\)2 of the Committee of Ministers to member States on democratic accountability of elected representatives and elected bodies at local and regional level](#).
- [Recommendation \(2023\)5 of the Committee of Ministers to member States on the principles of good democratic governance](#) and its [Explanatory Memorandum](#).

#### Specific instruments adopted by the Congress of Local and Regional Authorities

- [Resolution 79 \(1999\)](#) and [Recommendation 60 \(1999\)](#) on political integrity of local and regional elected representative, including the [European Code of conduct for the political integrity of local and regional elected representatives](#) appended thereto.
- [Resolution 316 \(2010\)1](#) on Rights and duties of local and regional elected representatives: the risks of corruption.

- [Resolution 393 \(2015\) and Recommendation 383 \(2015\)](#) on Conditions of office of elected representatives.
- [Resolution 401 \(2016\)](#) on Preventing corruption and promoting public ethics at local and regional levels, including the Roadmap of activities for preventing corruption and promoting public ethics at local and regional levels appended thereto.
- [Resolution 402 \(2016\)](#) on the misuse of administrative resources during election processes: the role of local and regional elected representatives and public officials.
- [Resolution 421 \(2017\) and Recommendation 405 \(2017\)](#) on making public procurement transparent.
- [Resolution 434 \(2018\) and Recommendation 423 \(2018\)](#) on conflicts of interest at local and regional level.
- [Resolution 435 \(2018\) and Recommendation 424 \(2018\)](#) on transparency and open government.
- [Resolution 441 \(2019\) and Recommendation 428 \(2019\)](#) on fighting nepotism within local and regional authorities.
- [Resolution 444 \(2019\) and Recommendation 435 \(2019\)](#) on the Protection of whistleblowers: Challenges and opportunities for local and regional government.
- [Resolution 433 \(2018\)](#) adopting the [European Code of Conduct for all Persons Involved in Local and Regional Governance](#).
- [Resolution 443 \(2019\) and Recommendation 434 \(2019\)](#) on Financial compensation of local and regional elected representatives in the exercise of their office.

## 5.2 Other international standards

- [United Nations Convention Against Corruption \(UNCAC 2003\) \(Chapter I - General provisions; Chapter II - Preventive measures; Chapter VI - Technical assistance and information exchange\)](#).
- [United Nations International Code of Conduct for Public Officials \(1996\)](#), (p. 30-32).
- [OECD Recommendation on Guidelines for Managing Conflict of Interest in the Public Service \(2005\)](#).
- [OECD Recommendation on Public Procurement \(2015\)](#).
- [OECD Recommendation on Public Integrity \(2017\)](#).
- [OECD Recommendation on Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises \(2019\)](#).
- [OECD Revised Recommendation on Principles for Transparency and Integrity in Lobbying and Influence \(2024\)](#).
- [EU Directive 2019/1937 on the protection of persons who report breach of Union Law](#)
- [EU directives on public procurement](#)

## 5.3 Further background materials

- [Transparency International's Local Governance Integrity: Principles and Standards](#).