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FIFTH EVALUATION ROUND

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

ADDENDUM TO THE SECOND COMPLIANCE REPORT

SLOVAK REPUBLIC



Adopted by GRECO
at its 100th Plenary Meeting (Strasbourg, 3-6 June 2025)



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

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I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (top executive functions, PTEFs) and law enforcement agencies (LEAs)".
2. This Addendum to the Second Compliance Report assesses the measures taken by the authorities of the Slovak Republic to implement the recommendations issued in the Fifth Round Evaluation Report on the Slovak Republic, which was adopted at GRECO's 83rd Plenary Meeting (17-21 June 2019) and made public on 22 August 2019, following authorisation by the Slovak Republic. GRECO previously assessed the implementation of the Fifth Round recommendations in the Compliance report (adopted at its 88th Plenary Meeting, on 22 September 2021, and made public on 19 January 2022) and in the Second Compliance Report (adopted at its 95th Plenary Meeting, on 1 December 2023 and made public on 17 April 2024).
3. In the Second Compliance Report, GRECO concluded that the Slovak Republic was not in sufficient compliance with the recommendations, triggering the application of Rule 32 revised, paragraph 2, subparagraph (iii), regarding the conduct of a high-level mission. Consequently, on 26 September 2024 GRECO carried out a high-level mission to the Slovak Republic to reinforce the importance of complying with, and discuss the best ways of implementing, the outstanding recommendations.¹
4. Following the high-level mission, and as required by GRECO's Rules of Procedure², the authorities of the Slovak Republic submitted a Situation Report on measures taken to implement the recommendations. This report was received on 27 December 2024 and, together with subsequent updates, served as a basis for this Addendum.
5. GRECO selected Albania (with respect to top executive functions in central governments) and Poland (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The rapporteurs appointed were Ms Adea Pirdeni, on behalf of Albania, and Ms Alicja Klamczyńska, on behalf of Poland. They were assisted by GRECO's Secretariat in drawing up this Addendum.

II. ANALYSIS

6. GRECO addressed 21 recommendations to the Slovak Republic in its Evaluation Report. In the Second Compliance Report, GRECO concluded that the Slovak Republic had satisfactorily implemented three of the 21 recommendations contained in the Fifth Round Evaluation Report. Of the remaining 18 recommendations, four had been partly implemented and fourteen had not been implemented. More specifically, recommendations xi, xiii, and xvii had been implemented satisfactorily, recommendations xii, xiv, xv and xxi had been partly implemented and

¹ Also see the corresponding [press release](#) for more information.

² 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.

recommendations i-x, xvi and xviii-xx had not been implemented. Compliance with the outstanding recommendations is dealt with below.

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

Recommendations i

7. *GRECO recommended that state secretaries be subject to an integrity check as part of recruitment.*
8. GRECO recalls that this recommendation was not implemented.
9. The Slovak authorities report that state secretaries are appointed and dismissed by the Government and are subject to the Constitutional Law on Conflict of Interest. The constitutional right of access to elected and public office must be respected, as proposals for these appointments are considered exclusive personnel decision, reflecting the results of the democratic parliamentary elections. The integrity of state secretaries is reportedly checked by the Government, which publishes the candidates' full resume to ensure public scrutiny of their integrity, personal qualities and qualifications. The draft Code of Conduct for persons with top executive functions – PTEFs, currently under inter-ministerial consultation (procedure number "LP/2025/69"), will also apply to Secretaries of State, while the Government is the final arbiter of the standards of conduct applicable to Secretaries of State.
10. GRECO wishes to clarify that the introduction of integrity checks as part of the selection process of state secretaries does not call into question an individual's constitutional right of access to public office. The aim of such checks is to assess a candidate's potential conflicts of interest, by reviewing, for example, liabilities, interests, financial aspects, family ties, ancillary activities or contacts with third parties. As stated in the Evaluation Report, such checks would contribute to selecting individuals with integrity and increasing the public trust in these high-level government posts. The draft code of conduct for PTEFs does not currently contain any provision defining the scope of integrity checks or requiring their conduct, and the authorities have not presented any other measures that would satisfy, even partially, the requirements of this recommendation.
11. GRECO concludes that recommendations i remains not implemented.

Recommendations ii

12. *GRECO recommended that the status of political advisers be clarified: (i) advisers, including those working in advisory boards which may influence political decision-making, should undergo an integrity check as part of recruitment and; (ii) the names of all advisers, their functions and remuneration linked to government tasks should be systematically published on governmental websites.*
13. GRECO recalls that this recommendation was not implemented.

14. The Slovak authorities report that each ministry has a designated anti-corruption coordinator, who provides guidance and training on integrity issues. The Prime Minister's office publishes the names of advisers on a [webpage](#), along with their functions, and the remuneration of certain advisers is disclosed in the Central Contracts Register. The draft code of conduct for PTEFs, which is undergoing the inter-ministerial consultation procedure, contains a requirement for the publication of the names of advisers.
15. GRECO notes that, regarding the first part of the recommendation, no progress has been made to introduce integrity checks for political advisers. Consequently, it has not been complied with. However, with respect to the second part, it welcomes the disclosure of names and functions of the Prime Minister's advisers as well as the publication of remuneration for some of them. For this reason alone, the recommendation has been partly implemented, while noting that the remuneration of all advisers has yet to be made public. GRECO expects that the practice applied by the Prime Minister's office will serve as a good example and encourage other ministries to follow suit in disclosing the names, functions and remuneration of advisers linked to government tasks.
16. GRECO concludes that recommendation ii has been partly implemented.

Recommendation iii

17. *GRECO recommended that an operational corruption prevention action plan is adopted to cover the government, based on a risk assessment specifically targeting persons with top executive functions, and includes particular steps to mitigate risks identified in respect of them.*
18. GRECO recalls that this recommendation was not implemented. Plans were underway to prepare a new strategic material in the area of preventing corruption and promoting integrity.
19. The Slovak authorities now report that, in line with the Manifesto of the new Government for the period 2023-2027, a new national anti-corruption strategy for the period 2024-2029 has been drafted and is undergoing the inter-departmental consultation process. It will be accompanied by an action plan and will comprise corruption risk management. In this regard, methodological guidelines on harmonisation of corruption risk management are being prepared. Each ministry monitors its specific risks and risk-prone positions and identifies corresponding mitigating measures. The authorities further state that ISO standard 37001:2016³, which assesses compliance of anti-bribery management system with audit criteria, is being implemented by various government authorities.
20. GRECO takes notes of the information provided, including the authorities' efforts to prepare and adopt a new national anti-corruption strategy. However, it is unable to

³ As stated on the [International Organisation for Standardisation's website](#), it has been superseded by ISO 37001:2025.

identify any concrete progress regarding the conduct of a risk assessment for PTEFs or the subsequent adoption of an operation corruption prevention action for the Government.

21. In these circumstances, GRECO concludes that recommendation iii remains not implemented.

Recommendation iv

22. *GRECO recommended that (i) a code of conduct for persons with top executive functions (ministers, state secretaries, political advisors and senior civil servants closely associated with decision-making) be adopted and made public in order to provide clear guidance regarding conflicts of interest and other integrity related matters (such as gifts, contacts with third parties, ancillary activities, the handling of confidential information and post-employment restrictions), and (ii) that proper monitoring and enforcement of such a code be ensured.*
23. GRECO recalls that this recommendation was not implemented. Consultations were underway to introduce a package of measures to implement it.
24. The Slovak authorities report that the Office of the Government, in cooperation with the Council of Anti-corruption Coordinators, has prepared a code of conduct for PTEFs. It has been submitted for public consultation by the Office of the Government and is undergoing the inter-ministerial consultation procedure. The purpose of the draft code is to further clarify and supplement the principles of integrity and conduct for PTEFs, namely the principles of promoting the public interest (including instructions to avoid any conflicts of interest), a sense of service, honesty and integrity, objectivity, a higher duty of care (including instructions to handle public resources with care), accountability for one's actions and decision, transparency (including instructions to refuse to accept gifts, with an obligation to declare protocol gifts exceeding 350 EUR, and to refrain from disclosing confidential information), decency and inclusion and the principle of leadership. The Prime Minister is the final arbiter of the standards of conduct expected of members of the Government, and the Government acts as the final arbiter of the conduct of other PTEFs, such as Secretaries of State, Secretaries-General of Service Offices and Heads of other Central Government Departments. The explanatory report states that it has been prepared in response to, among others, GRECO's recommendations. It builds on the existing legal framework on public integrity. It is soft law and declaratory in nature, and it does not impose any legal obligations. Nor does any breach give rise to liability.
25. GRECO notes that, regarding the first part of the recommendation, a draft code for PTEFs is currently under inter-ministerial consultation. It comprises several principles of conduct, along with summary explanations. GRECO encourages the authorities to complete the adoption procedure expediently and consider supplementing the draft code with provisions regulating contacts with third parties, the exercise of secondary activities, and post-employment restrictions. Concerning the second part, the draft code provides that the Prime Minister and the Government are arbiters of its

implementation, without defining any sanctions or liability. In these circumstances, GRECO considers that both parts of the recommendation have only been partly implemented.

26. GRECO concludes that recommendation iv has been partly implemented.

Recommendation v

27. *GRECO recommended that (i) briefing and training on integrity issues be systematically organised and administered for persons with top executive functions upon taking up their positions, and regularly thereafter, and (ii) confidential counselling on ethical issues always be accessible to them.*

28. GRECO recalls that this recommendation was not implemented.

29. The Slovak authorities report that the Ministry of the Interior, in cooperation with the Office of the Government, have launched an e-learning training on preventing corruption, which is open to PTEFs to attend. Additionally, each ministry has a designated anti-corruption coordinator who, in coordination with the Council of Anti-corruption Coordinators, provides advice on conflicts of interests, the receipt of gifts, whistleblower protection, and guidance/training on integrity issues. In this regard, anti-corruption coordinators receive regular training.

30. GRECO takes note of the information submitted by the authorities. However, in the absence of figures demonstrating the actual participation of PTEFs in briefings, confidential counselling or the e-learning training course, it is unable to assess whether either part of the recommendation has been complied with, even partially.

31. GRECO concludes that recommendation v remains not implemented.

Recommendations vi

32. *GRECO recommended that rules be laid down to govern (i) contacts between persons with top executive functions and lobbyists/third parties that seek to influence the public decision-making process and (ii) the disclosure of such contacts and the subject-matters discussed.*

33. GRECO recalls that this recommendation was not implemented.

34. The Slovak authorities report that, as part of their commitment to strengthening transparency, the draft code for PTEFs includes an implied obligation to disclose meetings with third parties. Under the section on the principle of transparency, the draft code states that PTEFs "shall act and decide transparently, give reasons for [their] decisions and make them public (...) The decisions must not be driven by bias, inappropriate lobbying or ideological prejudice". As an example of good practice of public disclosure, the Prime Minister regularly discloses information about his official or informal meetings with social partners (employers and trade unions), who display

characteristics of lobbyists, through the Prime Minister's Programme Institute, the Slovak Press Agency, social media and press releases which are regularly published on the Slovak Government's website. In addition, a draft law on lobbying has been submitted to the National Council. It intends to regulate interactions between PTEFs and third parties, promoting transparency, disclosure and accountability in decision-making.

35. GRECO recalls that the aim of this recommendation was to address the informal influence exerted on PTEFs in decision-making processes. As described in the Evaluation Report, in a country the size of the Slovak Republic, the proximity between PTEFs and third parties/lobbyists, who could influence the decision-making process, calls for proper guidance to be provided to PTEFs so as to clearly differentiate what qualifies as strictly private exchanges from meetings that may influence, or may be seen as seeking to influence, the decision-making process. The latter should be duly reported and accessible to the public.
36. Against this backdrop, GRECO sees little to no substantive connection between the implied obligation in the draft code for PTEFs and the measures specifically called for by the two components of this recommendation. While GRECO acknowledges the Prime Minister's reported initiatives to publicly disclose meetings with social partners, who are regarded as lobbyists, through various communication channels, as well as the submission of a draft law on lobbying to parliament, no supporting evidence has been provided to substantiate these claims. GRECO therefore calls on the authorities to direct their efforts to address the essence of the recommendation.
37. GRECO concludes that recommendation vi remains not implemented.

Recommendations vii

38. *GRECO recommended that a requirement of ad hoc disclosure be introduced in respect of ministers, state secretaries and all advisers, regardless of their status, in situations of conflicts between private interests and official functions, as they occur.*
39. GRECO recalls that this recommendation was not implemented.
40. The Slovak authorities report that the draft code of conduct will require PTEFs to avoid conflicts of interest, give advance notice of them and refrain from any action that could lead to a conflict of interest. They are also expected to address any conflicts of interest that arise.
41. GRECO notes that the recommendation calls for the transparent declaration of conflicts of interest as they occur. While the draft code of conduct for PTEFs includes provisions for avoiding or managing conflicts of interest, it does not explicitly require the *ad hoc* disclosure of conflicts of interest as they arise. In any event, the draft code is currently undergoing inter-departmental consultation procedure and has not yet been finalised.
42. GRECO concludes that recommendation vii remains not implemented.

Recommendation viii and ix

43. *GRECO recommended:*

- establishing more stringent rules on gifts and other benefits for persons entrusted with top executive functions in the form of appropriate practical guidance, the obligation of reporting them and informing the public (recommendation viii); and

- that (i) post-employment restrictions be broadened in respect of ministers and state secretaries and laid down for advisers and senior civil servants involved in top executive functions and (ii) rules on persons with top executive functions expressly prevent lobbying activities towards the government for a lapse of time after they leave government (recommendation ix).

44. GRECO recalls that none of recommendations was implemented.

45. The Slovak authorities report that they are currently assessing how to implement both recommendations. As regards recommendation viii, they submit that, under Article 4, paragraph 2, letter b of the [Act on the Protection of the Public Interest in the Performance of Public Officials' Functions](#), PTEFs cannot request gifts or other advantages. This does not apply to gifts normally provided in the performance of public functions or gifts provided on the basis of a legal provision. Furthermore, under Article 7, paragraph 1, letter f) of the same Act, public officials, including PTEFs, are required to report gifts, specifying their type and date of receipt, if their value exceeds ten times the minimum wage, i.e. above 7,500 EUR, within 30 days of taking up their functions and annually thereafter. These provisions concern gifts received in a personal capacity, such as donations.

46. Additionally, the draft code of conduct for PTEFs will include a requirement that protocol gifts with a value of more than 350 EUR should be recorded in a register maintained by each Ministry (see paragraph 24 above).

47. GRECO notes that the Slovak authorities are still considering how to implement recommendations viii and ix. Regarding the current applicable rules on gifts, GRECO reiterates its concerns that the reporting threshold for gifts received in a personal capacity (e.g. donations), set at 7,500 EUR, is far too high for PTEFs (also see paragraphs 119 and 120 of the Evaluation Report). Similar concerns apply to the proposed threshold of 350 EUR for the registration of protocol gifts, which also remains relatively high. Furthermore, no practical guidance has been provided to PTEFs on how to interpret and apply the rules on acceptable gifts in practice.

48. GRECO concludes that recommendations viii and ix remain not implemented.

Recommendation x

49. *GRECO recommended that the system of asset declarations for persons with top executive functions be strengthened (i) by lowering the thresholds above which assets need be declared and by making public more information contained in the declarations*

of assets; (ii) by ensuring that adequate verifications are carried out, including through appropriate resources and auditing capabilities of the control body, and sanctions applied.

50. GRECO recalls that this recommendation was not implemented. In the Second Compliance Report, an analysis of the system for the submission of asset declarations had completed the inter-ministerial review process and was pending approval by the then Government.
51. The Slovak authorities report that, in line with the Manifesto of the new Government (also see paragraph 19 above), constitutional and legal consensus will be sought to introduce uniform rules for submitting asset declarations by public officials through a digitalised system. Work is underway to assess how to implement the recommendation, while the authorities are also considering current security threats that have emerged following the attempted assassination of the Prime Minister, especially regarding the protection of public officials' personal data. Such data is made available upon an access-to-information request.
52. GRECO takes note of the information provided and urges the authorities to make tangible progress in strengthening the system of asset declarations for PTEFs and in addressing both parts of the recommendation. GRECO further reiterates that it has consistently called for the publication of PTEFs' declarations of assets to increase transparency and accountability and to allow for comparisons over time, while recognising that personal information, especially sensitive data, would not necessarily need to be made public. For now, GRECO is unable to conclude that either part of the recommendation has been even partly implemented.
53. GRECO concludes that recommendation x remains not implemented.

Regarding law enforcement agencies

Recommendation xii

54. *GRECO recommended that (i) the Code of Ethics is updated and covers in detail all relevant integrity matters (such as conflict of interest, gifts, contacts with third parties, outside activities, the handling of confidential information), supplemented with a manual illustrating all issues and risk areas with concrete examples; (ii) all awareness and training to police members be based on this revised Code of Ethics and manual and (iii) the Code of Ethics be made known to the public.*
55. GRECO recalls that this recommendation was partly implemented. With regard to the first and third parts of the recommendation, a new code of ethics was adopted and made public. However, the code lacked an explanatory guide, which was under preparation. As to the second part, certain awareness and information sessions had been carried out for police officers based on the new code.
56. The Slovak authorities report that a [guide](#) was drafted at the end of 2023 and published online. It explains in detail each of the norms and values described in the code, such as

legality and professionalism, impartiality, professional responsibility and professional discipline, credibility, integrity and conflict of interest. The guide includes concrete, practical examples for each principle, along with corresponding guidance and explanations. According to the authorities, it has become a teaching resource within the curriculum for post-secondary vocational education to support and enhance police officers' basic training and education. The authorities have submitted extracts of the curriculum, which shows that, at the beginning of their studies, in the course on ethics and the psychology of police work students are familiarised with the code of ethics for members of the Police Force. In the course on law, they are instructed on substantive criminal law provisions, including selected corruption offenses. Additionally, the authorities have submitted that 6,147 police officers have completed the online anti-corruption training package' (see paragraph 61 below).

57. GRECO welcomes the production and publication of a detailed explanatory guide on the content of the code of ethics and considers the first part of the recommendation to have been complied with. It also notes that the code is included in the basic post-secondary vocational training and education for police cadets, and that a new anti-corruption training package has been developed and followed by a considerable number of serving police officers, both of which are in line with the requirements of the second part of the recommendation. GRECO encourages the authorities to continue promoting the code of ethics and its accompanying guide in initial and ongoing in-service training, in order to raise awareness, strengthen integrity and prevent corruption.

58. GRECO concludes that recommendation xii has been implemented satisfactorily.

Recommendation xiv

59. *GRECO recommended that (i) training of police officers on integrity matters applicable to the police be strengthened and better connected to their professional development; (ii) specialised training for investigators dealing with corruption cases be enhanced; (iii) that a system of trained persons of trust be appointed in order to provide confidential counselling on ethical and integrity matters to all police members.*
60. GRECO recalls that this recommendation was partly implemented. With regard to the first part of the recommendation, the provision of training was to be linked with the new code of ethics and the supplementary guide. The second part was considered implemented in view of specialised training provided to NAKA investigators in 2021 and 2022. Concerning the third part, the authorities had intended to establish a network of integrity coordinators to provide confidential counselling.
61. The Slovak authorities report that the Criminal Police Department (CPD) of the Presidium of the Police Force annually reminds other Police Force departments to carry out refresher courses on anti-corruption. All departments have been informed of the newly created online 'anti-corruption training package'. It contains three parts. The first part deals with basic theoretical knowledge on the principles of ethical conduct, transparency and professionalism. The second part focuses on the anti-corruption police of the Ministry of the Interior. The third part addresses the protection of whistleblowers

in reporting corruption. Together with the code of ethics, the anti-corruption package is used as a tool to promote integrity and prevent corruption within the ranks of the Ministry of the Interior, which comprises the Police Force. Both tools are available to everyone, and their existence is brought to the attention of employees through newsletters, meetings, emails, social networks, etc. Between 9 December 2024 and 14 May 2025, about 6,147 police officers have completed the online training.

62. The CPD is involved in compiling a list of police officers, from amongst staff at regional police directorates, who will be responsible for integrity matters. A training session is scheduled for 11 June 2025, and the authorities are working to define the scope of their responsibilities.
63. GRECO recognises that, in relation to the first part of the recommendation, an online anti-corruption training package has been developed and used by 6,147 police officers in the last six months. It considers this part of the recommendation to have been complied with and encourages the authorities to maintain the momentum by continuing to provide integrity-related training to police officers throughout their career. As to the third part of the recommendation, GRECO notes that the authorities plan to train designated police officers to provide confidential counselling on integrity matters, and that work is underway to define their specific responsibilities.
64. GRECO concludes that recommendation xiv remains partly implemented.

Recommendation xv

65. *GRECO recommended that measures be taken to increase the representation of women in the Police Force, including in more senior positions.*
66. GRECO recalls that this recommendation was partly implemented. More tangible progress demonstrating an increased representation of women in the Police Force, particularly in senior positions, was required.
67. The Slovak authorities now report that a training workshop titled “Use your potential and be a leader” was organised in both September 2023 and 2024. The workshop focused on promoting women in management positions. The Slovak Centre for Human Rights is also cooperating with the leadership of the police’s trade union to organise training sessions in secondary police school. Over 60 female police officers are expected to attend the training in 2025.
68. In addition, the CPD of the Presidium of the Police has published information on the Ministry of the Interior’s intranet, along with a questionnaire titled “Use your potential – corruption”, designed to solicit opinions from police officers on giving or receiving bribes or undue remuneration, and on the role of women. In this context, a mapping of the number of women in managerial positions in the country has been created and will be updated regularly.

69. These trainings are organised annually and are consistent with the Action Plan for Gender Equality and Equal Opportunities for 2021-2027⁴. As a result, the number of women in management positions, as well as in the overall police workforce, has steadily increased from 2020 to 2024.

Women in the Police Force 2020-2024						
	1.1.2020	1.1.2021	1.1.2022	1.1.2023	1.1.2024	1.11.2024
Total nos. of police officers	21,992	21,163	20,678	20,529	20,037	19,303
of whom women	4,301	4,349	4,497	4,627	4,730	4,758
% of women	19.56%	20.55%	21.75%	22.54%	23.61%	24.65%
total no. of supervisors	2,566	2,393	2,762	2,368	2,429	2,406
of whom women	361	351	386	352	400	409
% of women	14.07%	14.67%	13.98%	14.86%	16.47%	17.00%

70. GRECO recognises the measures taken by the authorities to increase the representation of women in the Police Force, including in management positions, as evidenced by a steady increase over the years.

71. GRECO concludes that recommendation xv has been dealt with in a satisfactory manner.

Recommendation xvi

72. *GRECO recommended that the security check system be strengthened, including by ensuring that integrity checks take place at regular intervals in the careers of police members, depending on their exposure to corruption risks and the required security levels.*
73. GRECO recalls that this recommendation was not implemented. Proposed legislative amendments to the Civil Service of the Police Force Act had not moved forward.
74. The Slovak authorities state that security checks of police officers, which were not subject to evaluation, are conducted through the provision of a criminal record and other checks based on information submitted in a security questionnaire. At the conclusion of this process, a time-limited security clearance certificate (at various levels) is issued in accordance with legislation on access to classified information. Security checks are carried out upon joining the Police Force, or in case of expiry of existing clearance, or transfers and reassignments that require a higher-level security clearance. Police officers are required to report significant changes in their financial situation or personal life circumstances that could affect the validity of their security clearance.

⁴

<https://www.employment.gov.sk/files/sk/ministerstvo/spolocny-sekretariat-vyborov/vybor-rodov-rovnot/dokumenty-udalosti/ap-rovnosti-zien-muzov-rovnosti-prilezitosti-2021-27.pdf>

75. With respect to integrity checks, a new draft Law on the Service Relationship of the Police Force is under preparation. The current proposal aims to establish a legal basis for conducting such checks and to clarify the resulting obligations for police officers. The authorities expect to make proposals to implement this recommendation by the deadline for the submission of the draft law, i.e. 31 December 2025. In addition, the Bureau of the Inspection Service, using information obtained through Europol and bilateral contacts, is currently analysing legal arrangements regarding integrity checks in other European countries (e.g. Hungary, Czechia), particularly the so-called 'reliability test'. A representative from the Czech General Inspection of Security Forces was invited to present the Czech experience at a workshop on anti-corruption measures held in May 2025. A concept paper on the application of reliability tests in security services has been prepared. The Bureau is now considering introducing an 'integrity test', which will comprise elements of the reliability test, to assess the integrity of police officers, while ensuring compliance with the principle of proportionality.
76. GRECO takes note of the information provided, including the authorities' intention to introduce integrity checks as part of the security check system, depending on police officers' exposure to corruption risks. However, pending the introduction or adoption of concrete measures, the recommendation cannot yet be considered even partly implemented. GRECO encourages the authorities to translate this intention into tangible and adequate action by the time of the next and final compliance report.
77. GRECO concludes that recommendation xvi remains not implemented.

Recommendation xviii
78. *GRECO recommended that rules be adopted to ensure transparency and limit the risks of conflicts of interest when police officers leave the Police Force to work in other sectors.*
79. GRECO recalls that this recommendation was not implemented. A working group on the harmonisation of rules on conflicts of interest has been established.
80. The Slovak authorities report that, based on an analysis of legislation in other countries (e.g. Austria and Italy), the situation of post-employment restrictions when police officers leave the Police Force have not been regulated.
81. GRECO notes that the situation remains unchanged since the time of the evaluation: there are still no rules on post-employment restrictions for police officers. GRECO can only regret the continued inaction of the authorities to adopt rules to ensure transparency and limit the risks of conflicts of interest when police officers leave the police to work in other sectors, as recommended⁵.

⁵ The Slovak authorities refer to the cases of Austria and Italy, both of which have some post-employment rules applicable to law enforcement officials, as described in their respective evaluation reports. It is recalled that each country is assessed by GRECO in light of its own specific context and circumstances, without prejudice to the situation in other member States. For these reasons, the considerations made in the Fifth Round Evaluation

82. GRECO concludes that recommendation xviii remains not implemented.

Recommendation xix

83. *GRECO recommended that the control system of declarations of assets of police officers be strengthened, including by ensuring that control is carried out outside the chain of command and that statistics on sanctions are kept.*
84. GRECO recalls that recommendation xix was not implemented.
85. The Slovak authorities refer to the draft Law on the Service Relationship (see paragraph 75 above) and expect to make proposals to address this recommendation.
86. GRECO notes that, aside from the authorities' intention to implement the recommendation, no concrete progress has been made. In these circumstances, GRECO concludes that recommendation xix remains not implemented.

Recommendation xx

87. *GRECO recommended that the safeguards of the complaint mechanism be further reinforced so as to guarantee that investigations into complaints of police misconduct are impartial and seen as such by ensuring a sufficient level of transparency to the public.*
88. GRECO recalls that recommendation xx was not implemented.
89. The Slovak authorities report that, in order to implement Act no. 9/2010 Coll on Complaints, the Ministry of the Interior issued Regulation no. 48/2019 on complaints, as amended by Regulation no. 92/2020. According to the current procedures, a complaint against a police officer is first examined by the Bureau of the Inspection Service (BIS).⁶ In case of disagreement with the outcome, the complainant may file a new complaint or appeal to the superior body, namely the Office of the Minister of the Interior (§§ 21 and 22 of the Act on Complaints). In disagreement persists, the Office of the Government is competent to handle a complaint against the Minister's decision.
90. Criminal offences are investigated by the BIS's investigation unit. Its investigators are independent, and the legality of their actions is subject to supervision by the public prosecutor.

Report on the Slovak Republic (paragraph 216) regarding the advisability of introducing post-employment rules, particularly in sensitive areas, remain pertinent.

⁶ Under Section 4a of Act no. 171/1993 Coll. on the Police Force, as amended, the Bureau of the Inspection Service is a special unit of the Police Forces. The Bureau is responsible for detecting and investigating criminal offences committed by, among others, members of the Police Force. To the extent defined by the Minister of the Interior, the Bureau also performs tasks in the fields of internal control, financial control, protection of personal data, handling of complaints, and other areas. The Director of the Bureau is accountable to the Government for the performance of his or her functions. The Bureau's internal organisation is determined by the Minister of the Interior, based on a proposal by the Director.

91. In addition, the Public Defender of Rights (Ombudsperson) may deal with complaints. In a letter addressed to the Ministry of the Interior on 24 April 2024, the Ombudsperson stated that the cooperation with the BIS had been limited to the exchange of information but overall positive. The Ombudsperson further highlighted that while the BIS's independence had been strengthened through the introduction of selection procedures for the position of its Director, the role of the Minister of the Interior in appointing the Director has equally been reinforced. Referring to the ECtHR's case-law⁷, the Ombudsperson expressed concern that the BIS cannot be regarded as fully independent and recommended that it should be subject to further reform.
92. GRECO notes that no new steps have been taken to reinforce the independence of the Bureau of Inspection Service, which remains under the authority of the Minister of the Interior who is involved in the appointment of the Bureau's director and determines its internal organisation. This concern was already raised in paragraph 231 of the Evaluation Report and lies at the core of this recommendation, as further emphasised by a recent communication from the Ombudsperson. In these circumstances, GRECO considers it important to reinforce the independence of the BIS, possibly by way of legal amendments and changes to its structural accountability.
93. GRECO concludes that recommendation xx remains not implemented.

Recommendation xxi
94. *GRECO recommended (i) that the effectiveness of the protection of whistleblowers be improved in terms of the processing of such reports, in particular in respect of the independence and autonomy of the processing authority and (ii) that police members be trained and informed on a regular basis about whistleblowing protection measures.*
95. GRECO recalls that this recommendation was partly implemented. Concerning the first part, GRECO expressed concerns about the BIS's independence. As for to the second part, GRECO welcomed the initial training provided to police officers and encouraged the authorities to increase their outreach efforts.
96. The Slovak authorities report that, in relation to the first part of the recommendation, the Ministry of the Interior has issued Regulation no. 157/2023 to align with Act no. 54/2019 Coll. on the Protection of Whistleblowers. As the Ministry of the Interior is the employer of police officers, it has designated the Bureau of the Inspection Service (BIS) as the 'responsible person', within the meaning of the Whistleblowers Protection Act and the Regulation, to receive and verify notifications. Based on an assessment of the factual circumstances, BIS evaluates each case in accordance with the Whistleblower Protection Act. If the BIS establishes that a notification concerns criminal offence, it refers the matter to the relevant prosecutor's office and informs the concerned whistleblower; otherwise, reports are processed under other applicable legislation. Upon learning of the protected status granted to a whistleblower, the BIS informs the

⁷ [Eremiášová and Pechová v. the Czech Republic](#), no. 23944/04, 16 February 2012, and [Kummer v. the Czech Republic](#), no. 32133/11, 25 July 2013.

whistleblower's manager of the protected status, including not to take any disciplinary action against the whistleblower.

97. In 2024, BIS received 12 reports under the Whistleblower Protection Act, two of which were assessed on their merits. One was referred to the prosecutor's office, which has opened an investigation, and BIS has yet to be informed of the outcome. Another report was forwarded to the Public Procurement Office in accordance with the applicable legislation. In 2025 three reports have been submitted, two of which were referred to the BIS's control department for further examination and one has been referred to the prosecutor's office.
98. Since December 2023, a prevention and support department has been established within BIS and has organised several workshops and training courses in line with the second part of the recommendation. By 30 September 2024, a total of 1,563 employees of the Ministry of the Interior (753 civil servants and 810 members of the Police Force) received training. A learning management system (LMS) platform was pilot tested in November and December 2024 as a tool to train staff of the Ministry of the Interior in the field of crime prevention, which also includes a topic on corruption prevention. As a result, an additional 1,440 employees of the Ministry of the Interior and 5,787 members of the Police Force received training on preventing illegal conduct, including corruption, and on whistleblower protection. A dedicated training module is currently being developed by BIS, focused exclusively on raising awareness of the protection of whistleblowers for entities within the remit of the Ministry of the Interior, including the Police Force. This professional training will include explaining the specifics of corruption offences, the procedure for reporting anti-social activity and the legal rights of whistleblowers.
99. With regard to the first part of the recommendation, GRECO refers to paragraph 92 above, in which it expressed concerns about the lack of independence of the Bureau of Inspection Service (BIS), which is equally applicable when it acts as the internal reporting channel for whistleblowers. In addition, the Minister of the Interior has reportedly taken action against police officers who had been granted whistleblower status⁸, with one case having been referred to the Court of Justice of the European Union for a preliminary ruling.⁹ GRECO further recalls that a cornerstone principle of Recommendation CM/Rec(2014) 7 on the Protection of Whistleblowers, regarding channels for reporting and disclosure, is that the national framework should foster an environment that encourages reporting or disclosure in an open manner. Individuals should feel safe to freely raise public interest concerns. For these reasons, GRECO is not convinced that the effectiveness of the protection of whistleblowers has been further improved, as also reflected in the figures provided by the authorities regarding the number of reports received, and their onward referral or processing. Consequently, it considers that the first part of the recommendation remains partly complied with. GRECO further considers that the political leadership and management should lead by example in

⁸ <https://www.euractiv.com/section/politics/news/slovak-interior-minister-takes-legal-action-against-smer-investigators/>.

⁹ <https://curia.europa.eu/juris/showPdf.jsf?text=whistleblower&docid=294270&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1&cid=303598>.

respecting the protected whistleblower status and in pursuing appropriate legal avenues when challenging it.

100. Concerning the second part of the recommendation, GRECO notes with satisfaction the significant increase in the number of the Ministry of the Interior staff, including police officers, who have received training on whistleblowers' protection measures, and considers that it has been complied with. It encourages the authorities to maintain this momentum, particularly in light of the concerns made with respect to the first part of the recommendation.
101. GRECO concludes that recommendation xxi remains partly implemented.

III. CONCLUSIONS

102. In view of the foregoing, GRECO concludes that the Slovak Republic has satisfactorily implemented five of the twenty-one recommendations contained in the Fifth Round Evaluation Report. Of the remaining recommendations, four have been partly implemented and twelve have not been implemented.
103. More specifically, recommendations xi, xii, xiii, xv and xvii have been implemented satisfactorily, recommendations ii, iv, xiv and xxi have been partly implemented and recommendations i, iii, v-x, xvi, xviii, xix, xx have not been implemented.
104. With regard to top executive functions, the new Government's Manifesto for the period 2023-2027 envisages the adoption of several measures to implement GRECO's recommendations. This commitment was also expressed during GRECO's high-level mission to the Slovak Republic in September 2024. To date, it has been reflected in the preparation of a draft code of conduct for PTEFs, which is undergoing inter-departmental consultations following a public comment procedure, as well as in the Prime Minister's office publishing the names and functions of advisers and disclosing remuneration for some of them. That said, it is necessary to take appropriate and effective action to establish rules on the engagement of PTEFs with lobbyists and third parties, in particular to adopt the draft law on lobbying and disclose such contacts; to strengthen the regime on gifts and the system of asset declarations; and to broaden the scope of post-employment restrictions. In addition, integrity checks for state secretaries and political advisers ought to be introduced; a corruption prevention plan for PTEFs should be adopted; and, initial briefings, regular training sessions and confidential counselling should be documented and made available for PTEFs. Consequently, the authorities are urged to demonstrate stronger resolve in fully implementing all ten recommendations regarding PTEFs by the time of the next and final compliance report.
105. Regarding law enforcement agencies, progress has been made with the production and publication of an explanatory guide on the code of ethics, which includes practical examples and provides advice. Measures have been taken to ensure the steady increase of women in the Police Force, including in management positions. Also, a significant number of police officers have received training on the code of ethics and on whistleblower protection measures. However, the situation in respect of other integrity

matters remains unchanged, with no visible progress. Rules on post-employment restrictions for police officers are still absent. The authorities' stated intention to introduce integrity checks as part of the security check system and to strengthen the control of asset declarations has yet to be translated into tangible measures. Of particular importance is the absence of an independent complaint mechanism and an effective internal reporting channel for whistleblowers within the Police Force, which should be addressed as a matter of priority to increase both public trust in the police and police officers' trust in the system, as well as to strengthen accountability and integrity. GRECO urges the authorities to take determined action to address all outstanding recommendations and bring about the much-needed progress.

106. In view of the above, GRECO concludes that Slovak Republic is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report within 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 the Slovak Republic to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations i-x, xiv, xvi, xviii-xix) by 30 June 2026.
107. In addition, in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii.c), GRECO invites the Secretary General of the Council of Europe to send a letter – with a copy to the Head of delegation of the Slovak Republic – to the Minister of Foreign Affairs of the Slovak Republic, drawing attention to the non-compliance with the relevant recommendations and the need to take determined action with a view to achieving tangible progress as soon as possible.
108. Finally, GRECO invites the authorities of the Slovak Republic to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.