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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

BELGIUM



For adoption by GRECO
at its 101st plenary meeting (Strasbourg, 18-21 November 2025)



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

COUNCIL OF EUROPE



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I. INTRODUCTION

1. The fifth GRECO evaluation round concerns “Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies”.

2. This Addendum to the Second Compliance Report assesses the measures taken by the Belgian authorities to implement the recommendations made in the Fifth Round Evaluation Report on Belgium, which was adopted by GRECO at its 84th plenary meeting (6 December 2019) and made public on 23 January 2020, following authorisation by Belgium. The corresponding Compliance Report was adopted by GRECO at its 89th plenary meeting (3 December 2021) and made public on 21 January 2022, following authorisation by Belgium. The Second Compliance Report was adopted by GRECO at its 96th plenary meeting (22 March 2024) and made public on 7 May 2024 following authorisation by Belgium.

3. As required by GRECO’s Rules of Procedure,¹ the Belgian authorities submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. This report was received on 30 June 2025 and served as a basis for this Addendum to the Second Compliance Report.

4. GRECO selected Switzerland (in respect of top executive functions in central governments) and Monaco (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The rapporteurs appointed were Mr Olivier GONIN, on behalf of Switzerland, and Mr Jean-Laurent RAVERA, on behalf of Monaco. They were assisted by the GRECO Secretariat in drawing up the Compliance Report.

II. ANALYSIS

5. GRECO made twenty-two recommendations to Belgium in its Evaluation Report. In the Second Compliance Report, it concluded that recommendations vi, ix, xiv, xv, xvi and xxii had been implemented satisfactorily, recommendations i, ii, iii, iv, v, viii, x, xi and xviii had been partly implemented, and recommendations vii, xii, xiii, xvii, xix, xx and xxi had not been implemented. Compliance with the sixteen outstanding recommendations is dealt with below.

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

Recommendation i

6. *GRECO recommended that (i) rules be laid down setting out the conditions governing the direct recruitment and employment of members of strategy units/private offices that take account of the risks relating to integrity and conflicts of interest, and that (ii) the names and duties of all “collaborateurs de fond” be published on the government’s internet sites.*

7. It is recalled that this recommendation was partly implemented. GRECO welcomed the extension of the code of conduct for public office holders, laying down rules on dealing with conflicts of interest, to members of ministers’ private offices and the statutory ban on

¹ The compliance procedure for the Fifth Evaluation Round is governed by GRECO’s Rules of Procedure as amended: see Rule 31 revised bis and Rule 32 revised bis.

employing staff members of listed publicly owned autonomous companies in private offices, noting that this was consistent with the first part of the recommendation. GRECO also noted, however, that tighter rules were required regarding the direct recruitment and employment terms of members of private offices, in particular with regard to multiple activities, effective checks on their integrity before and during employment, the specification of their tasks and transparency regarding their remuneration. As to the second part of the recommendation, it had been fully implemented.

8. The Belgian authorities point out that members of ministerial private offices are recruited on the basis of trust and play a specific role, closely linked to the minister's political mandate. The government believes that this relationship of trust is essential to the effective implementation of policy and to political cohesion within the private office. Given the specific nature of these positions, the government elected in the federal elections of June 2024 decided not to introduce a formal selection procedure for such appointments at that time. The current method of operation has therefore been maintained.

9. With regard to conflicts of interest, a circular² recently required members of strategy units and members of the federal government entrusted with tasks in connection with the award or supervision of the performance of public procurement contracts to make a written declaration confirming that they were aware of the statutory provisions relating to conflicts of interest in public procurement. This written declaration must be renewed every two years in order to make individuals aware that conflicts of interest are prohibited at all times. The declaration is checked (and also signed) by the line manager. If the person concerned is in a situation where third parties might reasonably consider that that person may have a conflict of interest, but this is not the case, they must make a further written declaration. In this document, they must state that they have no actual conflict of interest and provide the necessary explanation. In addition, the circular states that a member of staff who finds themselves in a conflict of interest situation (irrebuttable presumption) must recuse themselves and inform their managers immediately. The same applies to any member of staff who believes that there is a risk of a conflict of interest. It is then for the line manager to take the appropriate action to deal with the conflict of interest (perceived or otherwise) or to resolve it.

10. With regard to the second part of the recommendation, which has already been assessed by GRECO as implemented, it should be noted that the requirement for members of the federal government to make available to the general public by electronic means an updated list containing the names and positions of each member of their decision-making bodies is now formally enshrined in law.³

11. With regard to the first part of the recommendation, GRECO is fully aware of the trust placed in members of ministerial private offices and of the special political role that they play. In its view, this does not preclude the introduction of tighter rules regarding the recruitment and employment terms of such persons, which could be different from those applicable to staff whose role is not political in nature. However, it is important that the tasks of members of private offices be specified, that their integrity be subject to checks both before and during employment, that their remuneration be more transparent and that their outside activities be more strictly regulated, so that the shortcomings noted in the evaluation report (paragraphs

² Ministerial circular of 11 June 2024. – Public procurement - Ethics – Conflict of interest – Revolving doors

³ See Art. 2.2 of the [law of 11 April 1994](#), as amended by the law of 12 May 2024.

33 et seq.) can be remedied. It does not appear from the information provided that there has been any progress in this respect. The adoption of the ministerial circular on public procurement is certainly a step forward, but it seems to GRECO that this issue applies only marginally to members of ministerial private offices. The first part of the recommendation therefore remains partly implemented. Lastly, with regard to the second part of the recommendation, GRECO welcomes the fact that the requirement to publish and update the list of members of private offices has been formalised in law.

12. GRECO concludes that recommendation i remains partly implemented.

Recommendation ii

13. *GRECO recommended that a co-ordinated strategy be drawn up, based on a risk analysis, aimed at promoting the integrity of persons performing top executive functions.*

14. GRECO recalls that this recommendation was considered partly implemented in the previous report. Integrity co-ordinators were appointed within the federal public services to raise awareness and provide advice (including individually and confidentially) regarding integrity and to draw up, together with the Federal Network of Integrity Co-ordinators (RFCI), an integrity policy aimed at all the public agencies under the authority of a minister. Some data for mapping risks in this area were available and a royal decree required the adoption by each federal public service of annual integrity management plans as from 1 January 2024. GRECO invited the authorities to continue with this policy and further develop the steps taken, ensuring that ministers were also covered by the integrity strategy.

15. The Belgian authorities state that an integrity template was introduced by ministerial [decree](#) of 29 April 2024. This provides a comprehensive overview of the strategic elements of an integrity policy, based on identifying the organisation's vulnerabilities. In this way, the integrity co-ordinator appointed in each strategy unit has a tool to help them draw up a strategic integrity policy, together with the competent member of the federal government who must take the necessary steps to manage the integrity risks in their unit(s). Belgium also participated in a project entitled "*Strengthening the Strategic Approach to Public Integrity in Belgium, including the Integrity of Public Procurement Processes and the Data-Based Approach to Public Procurement Risk Management*", in which the OECD developed tools to support and strengthen integrity policy and integrity management in federal public-sector organisations. This project was completed in May 2025.

16. GRECO notes that, while the adoption of integrity templates for ministries is certainly a positive development, it is not clear at this stage from the information submitted that there is a risk analysis and a co-ordinated strategy aimed specifically at persons exercising top executive functions (PTEFs), who are the subject of the recommendation.

17. GRECO concludes that recommendation ii remains partly implemented.

Recommendation iii

18. *GRECO recommended that (i) an ethical code be adopted for ministers and steps be taken to ensure that members of strategy units/private offices are subject to a clear and harmonised ethical framework, and that (ii) the code or codes is/are accompanied by supervisory arrangements and appropriate sanctions.*

19. It is recalled that this recommendation was partly implemented. The first part was considered to have been fully implemented with the adoption of a code of conduct for members of the government and the existence of a clear and harmonised ethical framework applicable to all members of private offices. With regard to the second part of the recommendation, GRECO noted there was an adequate advisory mechanism through the Federal Ethics Committee. However, there was still no real mechanism for sanctioning failure by PTEFs to comply with the rules of conduct. GRECO considered that arrangements for political supervision of ministers' actions by the Prime Minister and Parliament, including compliance with the rules of conduct, could not as such be regarded as a means of supervising the implementation of the ethical and integrity rules applicable to ministers, or imposing sanctions for possible breaches of these rules. For the other PTEFs, the mechanism for opinions requested from the Federal Ethics Committee also did not make it possible to sanction violations of ethical rules. The second part of the recommendation remained unimplemented, therefore.

20. The Belgian authorities now explain that the federal government recognises the importance of a harmonised ethical framework for PTEFs, and that the existing mechanisms for political supervision of their actions cannot be equated with a formal sanction mechanism of the kind envisaged in the recommendation. The government will consider, when updating the code of conduct for members of the government, whether additional steps should be taken in this area.

21. GRECO takes note of the information provided, which gives no indication that progress has been made on the second part of the recommendation. It points out that the latter is concerned with the introduction of supervisory arrangements and sanctions for failure to comply with the rules of conduct, not only for ministers, but also for members of their private offices. It invites the Belgian authorities to also tackle this issue in their discussions. In the meantime, the first part of the recommendation remains fully implemented and the second part unimplemented.

22. GRECO concludes that recommendation iii remains partly implemented.

Recommendation iv

23. *GRECO recommended (i) ensuring that all persons exercising top executive functions have access to mechanisms for promoting and raising awareness of integrity matters, including confidential advice, and (ii) that these persons receive training when they take up their duties and at regular intervals thereafter.*

24. It is recalled that this recommendation was partly implemented. The first part was fully met, while the second part was only partly implemented. Training courses open to all PTEFs are held regularly by the Integrity Office of the Strategy and Support Federal Public Service on ethics and integrity challenges. These courses are not mandatory, however, and GRECO noted

that, in practice, they were almost never attended by ministers. GRECO therefore invited the authorities to ensure that members of private offices actually attended training upon taking up their duties and at regular intervals thereafter.

25. The Belgian authorities state, with regard to the second part of the recommendation, that PTEFs have access to integrity policy training provided by the Integrity Office and that an onboarding course for members of private offices is being finalised, which complements the integrity policy awareness training mentioned above. Various aspects of integrity will be addressed, including the regulatory framework, prevention of corruption and conflicts of interest, management of ethical dilemmas, and reporting of breaches of integrity. Certain topics or issues will be explored in greater depth in subsequent sessions, depending on demand from firms. The extent to which the government considers it appropriate to make this training mandatory will also be assessed. To date, there is namely no regulatory provision that requires members of private offices to attend a dedicated integrity training course.

26. GRECO is pleased that integrity training is provided as part of the onboarding process for members of ministerial private offices. The topics covered in this training course correspond to the objectives of the second part of the recommendation. However, at present, this training is neither effective nor compulsory. Furthermore, it is only aimed at cabinet members, not ministers. GRECO reiterates its call for all PTEFs to actually attend training upon taking up their duties and at regular intervals thereafter. In the meantime, the second part of the recommendation remains partly implemented.

27. GRECO concludes that recommendation iv remains partly implemented.

Recommendation v

28. *GRECO recommended ensuring that strategy units/private offices are made clearly subject to the legislation on administrative disclosure of information.*

29. It is recalled that this recommendation was partly implemented in the previous report, as a draft law being debated in Parliament was expected to make the private offices of ministers and state secretaries subject to the law on administrative disclosure of information.

30. The Belgian authorities report that under the law of 12 May 2024 amending the law of 11 April 1994 on administrative disclosure of information, strategy units of federal government have been brought within the scope of the 1994 legislation. This law also clarifies the scope of active and passive disclosure. The authorities further report that on 14 March 2024, the House of Representatives approved the draft law assenting to the Council of Europe Convention on Access to Official Documents.

31. GRECO welcomes the entry into force of the law bringing ministerial private offices within the scope of the law on administrative disclosure of information. It also welcomes the approval by the House of Representatives of the draft legislation assenting to the Tromsø Convention, which it hopes will shortly enter into force with respect to Belgium.

32. GRECO concludes that recommendation v has been implemented satisfactorily.

Recommendation vii

33. *GRECO recommended (i) ensuring an appropriate level of public consultation on government draft legislation, and (ii) that the results of public consultations are published online in due time and are easily accessible.*

34. It is recalled that this recommendation was not implemented. Specific one-off measures were taken to ensure public consultation about certain legislation or regarding certain institutional topics, but the government had not developed a policy or measures to consult society regularly about draft legislation according to established and predictable criteria, or to ensure the transparency of the process. The situation therefore remained as described in the Evaluation Report, with public consultations continuing to be carried out at the discretion of the authorities concerned.

35. The Belgian authorities state that the federal government attaches importance to transparency and to involving society in the drafting of legislation. They reiterate that various public forms of consultation are organised and that the results of these consultations are generally published in a transparent manner, notably via the website of the relevant administration or service. Although there is currently no formal strategic framework with established and predictable criteria for public consultation on each draft law, the government believes that the current method offers sufficient room for transparency and participation, according to the nature and importance of the draft legislation submitted. While the introduction of a strict general policy in this area is not considered necessary at present, the government remains attentive to developments in good practice in relation to public consultation.

36. GRECO notes that the information provided does not change the situation as described in previous reports. The current framework continues to be marred by the discretionary nature of public consultation on draft legislation and its lack of predictability, which is regrettable.

37. GRECO concludes that recommendation vii remains not implemented.

Recommendation viii

38. *GRECO recommended that (i) rules and guidelines be introduced on how persons exercising top executive functions should manage their contacts with lobbyists and other third parties seeking to influence government processes and decisions, and that (ii) steps be taken to make the purpose of such contacts more transparent by identifying the persons with whom (or on behalf of whom) the contact has taken place and the specific subject matter of the discussions.*

39. It is recalled that this recommendation was partly implemented in the previous report. Ministers were now subject to an obligation of transparency regarding their contacts with lobbyists, which was enshrined in the code of conduct for members of the government, although GRECO also expected clarification to be provided as to how the obligation could be implemented. GRECO also found it regrettable that the obligation was not explicitly applicable in similar terms to members of private offices. GRECO further noted that work was under way to ensure the transparency of lobbyists' dealings with ministers but it had not yet had an

opportunity to study relevant details. It was stressed that these rules should be extended to lobbyists' contacts with members of private offices.

40. The Belgian authorities now state that, in current practice, contacts between PTEFs and third parties, including representatives of interest groups, are governed by ethical rules and parliamentary oversight mechanisms, which offer guarantees of integrity and accountability. Members of government may, where appropriate, report on their contacts with third parties in the course of their parliamentary duties. This transparency is also underpinned by existing codes of conduct, which contain guidelines on the professional conduct of ministers and members of private office. The government is continuing to assess whether the existing framework needs to be strengthened or supplemented, having regard to international developments and relevant recommendations.

41. GRECO notes that it is not clear from the information submitted that tangible additional measures have been taken in implementing the recommendation. The codes of conduct referred to do not contain any specific provision on contacts between PTEFs and third parties. GRECO once again calls on the authorities to put into operation a comprehensive system for regulating contacts between PTEFs and lobbyists and other third parties, one that fully meets the requirements of the recommendation.

42. GRECO concludes that recommendation viii remains partly implemented.

Recommendation x

43. *GRECO recommended that a full set of rules be drawn up on gifts and other benefits for persons occupying top executive functions, in the form of practical and relevant directives requiring them to declare gifts and other benefits, and that this information be made available to the public.*

44. It is recalled that this recommendation was partly implemented. GRECO noted with satisfaction that ministers and members of their private offices were now subject, through the codes of conduct that applied to them respectively, to rules on dealing with gifts and other benefits received in the course of their duties. GRECO nevertheless noted that these rules did not provide for the registration of gifts for members of private offices and also did not provide for measures to inform the public in this connection, either for ministers or for members of private offices.

45. The Belgian authorities state that the government is prepared to consider how the principle of a register of gifts could be implemented in a practical and visible way.

46. GRECO takes note of the stated intentions and concludes that recommendation x remains partly implemented.

Recommendation xi

47. *GRECO recommended that (i) for a certain period, persons occupying top executive functions be required to inform an appropriate body of any new professional activities entered into, and that (ii) following assessment, such activities be regulated or prohibited, as*

appropriate, to avoid any suspicion of a conflict of interest when they concern a field of activity subject to authorisation or scrutiny by the body that the individual is leaving.

48. It is recalled that recommendation xi was partly implemented. The codes of conduct applicable to ministers and members of their private offices introduced certain relevant ethical rules governing the termination of their public duties. GRECO however deemed these rules inadequate insofar as they, firstly, did not entail an obligation to give notification, for a period to be specified, of any new professional activities and, secondly, were not sufficient to regulate or prohibit any new activities so as to avoid any suspicion of conflict of interest. It was underlined that there were no clear rules applicable to members of private offices in this area and that the law of 1931 prohibiting former ministers from involvement in the management or supervisory bodies of companies for five years after leaving office applied only to companies holding concessions from the state. GRECO therefore called for its scope to at least be extended to other types of companies and, more broadly, invited the authorities to strengthen the regulatory provisions relating to post-employment activities in line with the recommendation.

49. The Belgian authorities explain that, at present, there is no requirement in Belgium to give prior notification of new professional activities to a supervisory body after leaving office or to subject such activities to prior checks for conflicts of interest. The government believes that existing political oversight and parliamentary accountability offer sufficient guarantees as to the integrity of former office holders. It therefore considers that it is not appropriate at this stage to introduce additional obligations or regulations relating to post-employment professional activities.

50. GRECO notes that there has been no progress towards implementation of the recommendation.

51. GRECO concludes that recommendation xi remains partly implemented.

Recommendations xii and xiii

52. *GRECO recommended:*

- *(i) that the published declarations of persons occupying top executive functions also include relevant information on their assets, including liabilities, their previous activities and their outside activities, and (ii) considering also including information on these persons' spouses and dependent members of their families (on the understanding that such information would not necessarily have to be published) (recommendation xii);*
- *that declaration and oversight arrangements be substantially revised to ensure more rapid publication of these declarations, coupled with proactive and effective oversight (recommendation xiii).*

53. It is recalled that these recommendations were not implemented.

54. The Belgian authorities consider that the current system offers a balance between transparency and protection of the privacy of the individuals concerned. No additional

measures to extend the existing reporting framework or to restructure the oversight arrangements are planned, therefore.

55. GRECO deeply regrets that the government is not planning any measures to give effect to these recommendations. The shortcomings noted in this area are long-standing, since some of them date back to the fourth round evaluation, carried out in 2014, the declaration and oversight arrangements being common to PTEFs and parliamentarians. The observations made in the 2014 and 2019 evaluation reports concerning the inadequate nature of the information contained in the declarations and the lack of genuine oversight are still valid, therefore.

56. GRECO concludes that recommendations xii and xiii remain not implemented.

Preventing corruption and promoting integrity in the federal police

Recommendation xvii

57. *GRECO recommended that an examination be carried out of ways of increasing the stability of the federal police senior management, with a view to taking relevant measures to that effect.*

58. It is recalled that this recommendation was not implemented. GRECO noted in the previous report that 59 senior management posts in the federal police were not currently filled on a permanent basis and that senior positions in the criminal and the administrative police were still filled on an interim basis. It also noted that the examination recommended to avoid these interim appointments at senior management level in the federal police had not been carried out, although it remained relevant.

59. The Belgian authorities state that they have still not carried out a study into ways of increasing the stability of the federal police senior management. With regard to the number of senior managers, they give the following figures for June 2025. The Commissioner General, holder of the most senior position in the federal police, appointed by the King in 2024, has a five-year term of office. For lower-level senior officer posts (*mandataires*), 25 out of 30 are occupied by persons on permanent contracts and 5 by persons on non-permanent contracts, including two posts of director general, with vacancy announcements dependent on the future vision of the structure of the federal police. As for other senior administrator posts, of which there are 21 in total, 19 are occupied by permanent staff and 2 by non-permanent staff, pending the outcome of the current mobility procedures.

60. GRECO notes that, although the recommended study has not been carried out, the stability of senior management in the federal police has in fact increased. 44 of the 51 director posts - both *mandataire* and non-*mandataire* - are now occupied by permanent staff, which represents an acceptable level of stability, especially as two of the vacant posts are in the process of being filled. GRECO encourages the authorities to finalise the future vision of the structure of the federal police so that the *directeur mandataire* posts can be filled in a way that is sustainable.

61. GRECO concludes that recommendation xvii has been dealt with in a satisfactory manner.

Recommendation xviii

62. *GRECO recommended that checks on candidates' integrity be carried out in the context of changes of post and promotion – including promotion to senior grades – and at regular intervals during the course of officers' careers.*

63. It is recalled that this recommendation was partly implemented. A policy to step up career-long integrity screening for members of the federal police had been initiated with the development of a plan which was pending, subject to approval by the Minister of the Interior. GRECO noted that the implementation of the plan was a long-term undertaking, as it would affect the status of police officers and the organisation of the police force. It also noted that measures were being developed to interconnect various files concerning public security, which would make it possible to screen police officers in this respect.

64. The Belgian authorities explain that the “career-long integrity screening” working group has made several proposals to the highest decision-making bodies of the federal police, as well as to the Standing Commission of the local police. The latest version, validated internally, is currently awaiting approval and signature by the Minister of the Interior. The authorities hope to present this new memorandum to GRECO soon.

65. Pending receipt of further information on the proposed measures, GRECO concludes that recommendation xviii remains partly implemented.

Recommendation xix

66. *GRECO recommended that the right to exercise outside activities be strictly governed by objective and transparent criteria and that this be accompanied by effective oversight arrangements.*

67. It is recalled that this recommendation remained unimplemented. GRECO welcomed the authorities' growing awareness of the need to regulate police officers' outside activities more effectively and encouraged them to take concrete measures at the earliest opportunity to determine objective criteria for authorising such activities and monitoring them effectively. It could not consider, however, that this growing awareness meant that the recommendation had been implemented, even partly.

68. The Belgian authorities now report that, on the basis of thematic sessions held with thirty federal police directorates, the current legislative framework governing additional activities has been analysed and evaluated. An examination of the challenges presented by certain problematic outside activities led to 26 objective criteria being identified, which have now been included in a new memorandum, along with a revamped process and a self-reflection tool for the federal police. This draft memorandum has already been validated by the steering committee and will shortly be submitted to the High Committee for Consultation with the trade unions. The federal police accordingly expects to be able to present this new memorandum to GRECO by 30 September 2025.

69. GRECO welcomes the analysis and evaluation of the legislative framework governing outside activities, as well as the definition of objective criteria and the overhaul of the

authorisation process for such activities. These measures are undoubtedly a first step towards implementing the recommendation. However, GRECO is looking forward to being informed of the details of these measures and procedural changes, which have yet to be approved and implemented.

70. GRECO concludes that recommendation xix is partly implemented.

Recommendation xx

71. *GRECO recommended assessment of the need to introduce an obligation to declare assets/interests in respect of management positions and/or certain at-risk positions in the police, with a view to introducing such rules.*

72. It is recalled that this recommendation remained unimplemented. GRECO noted the authorities' stated intention to work towards implementing the recommendation and welcomed the measures taken to map the risks concerning integrity in the federal police. Nevertheless, it reiterated that the obligation to declare assets and interests set out in the recommendation was a proactive obligation subject to checks, which applied individually to police officers deemed to be at risk in terms of integrity. There was no indication of any specific initiative to consider introducing such obligations.

73. The Belgian authorities report that, following the new federal circular on public procurement, professional ethics, conflicts of interest and revolving doors,⁴ the steering committee of the federal police decided, on 19 July 2024, that senior managers and officers likely to be involved in public procurement would henceforth be required to sign a declaration and follow a specific procedure in cases where there was a risk of conflict of interest. Such involvement concerns (1) activities linked to the public procurement procedure (preparation and submission of a request to participate or a call for tenders, participation in negotiations, etc.) and (2) activities linked to the performance of all or part of the public procurement contract. The circular also applies to individuals involved in low-value public procurement contracts (small purchases): authorising officer; person responsible for drawing up technical specifications; purchaser (drafter of specifications or tenderer); member of staff with access to invitations to tender (or selection files); participant in the CEM (materials evaluation committee) or tender evaluator; person carrying out the actual delivery; invoice manager. Declarations are not required in the case of persons performing purely executive functions (with no authority to make assessments or knowledge of confidential data).

74. GRECO welcomes the introduction in the federal police, following the federal circular on public procurement, of a declaration stating that officers involved in such procedures are aware of the statutory provisions and do not have a conflict of interest - or that they recuse themselves if they do. These provisions undoubtedly represent progress. However, they are not the subject of the recommendation. As mentioned above and in previous reports, the latter concerns the obligation for certain persons to declare their assets, income, liabilities and/or interests to a supervisory authority, in order to prevent the risk of corruption. GRECO stresses that the recommendation does not require such a mechanism to be introduced but merely calls for consideration to be given to it. In the context of GRECO's long-standing

⁴ See footnote No. 2.

practice, this implies that a specific and documented study, meeting certain criteria,⁵ has been carried out. No such study has been carried out to date.

75. GRECO concludes that recommendation xx remains not implemented.

Recommendation xxi

76. *GRECO recommended ensuring that the internal control department is given the resources to combat corruption actively and to offer meaningful statistical oversight of disciplinary cases in the federal police.*

77. It is recalled that this recommendation remained unimplemented. GRECO noted the authorities' stated intention to develop a series of measures to step up internal control of the operation of the federal police, report more effectively on disciplinary measures concerning police officers, facilitate public access to mechanisms for complaining about police activity and report on and learn from such feedback from the public. GRECO encouraged the authorities to implement the planned measures and build on those already in place to ensure strengthened, proactive internal control of the federal police and report in a systematic, well-organised and accessible manner on the consequences of that control, in particular in disciplinary matters, in line with the aims of the recommendation. However, GRECO was not able to consider that these aims had been met, even partly, by the existing or planned measures.

78. The Belgian authorities refer to the launch in 2023 of the network of primary integrity actors within the federal police. These networks are made up of the integrity contact persons appointed within each unit of the directorates general, as well as the directors concerned. One of the first tasks of this network was completed in November 2023: the analysis and sharing of statistics on integrity risks in an annual report. From the end of 2025, an annual report on the various disciplinary cases handled each year within the federal police will be introduced, with the aim of providing strategic advice on individual and organisational shortcomings. The Disciplinary Board also draws up an annual report, which is analysed by the relevant departments in order to target the most common disciplinary infractions and launch specific awareness campaigns accordingly.

79. The authorities also mention the initiatives currently being implemented by the Integrity Department, in partnership with the various cross-departmental services and entities of the federal police, for the years 2024 and 2025. Two of the directorates general have drawn up a multi-year integrity management plan and intend to launch studies on certain relevant themes, including corruption and extremism, as well as gift management. In 2026/2027, the

⁵ Criteria established by the GRECO Bureau:

- I. *PERTINENCE: Has the reflection process carried out in the country concerned really taken into account GRECO's underlying concerns (and not something unrelated)?*
- II. *EXTENT: Were these concerns examined/discussed in depth, possibly with the involvement of appropriate (expert) institutions/individuals?*
- III. *LEGITIMACY: Has the decision to act/not to act been taken by an appropriate authority (ideally at political level – see also GRECO's case law on the status of draft legislation)?*
- IV. *DOCUMENTATION: Has the reflection process and/or its results been properly documented: dates of meetings; persons/institutions involved; written sources available, possibly even accessible to the public?*

Integrity Department will launch a large-scale project on professional supervision - the fight against ethnic profiling in the three directorates general.

80. GRECO welcomes the important activities put in place by the Integrity Department. It notes, however, that the recommendation relates specifically to internal control within the federal police which, at the time of the evaluation report, suffered from serious deficiencies and was not being adequately ensured. GRECO had stressed the need for a proactive and smoothly functioning internal control department as a key contribution to preventing and punishing corruption in the federal police. The initiatives reported, while commendable, do not meet the objective of the recommendation, therefore. The Disciplinary Board's annual report is a first step towards implementing the recommendation, as it contains detailed statistical information on disciplinary matters. The future annual report on disciplinary cases is also in line with the recommendation but does not yet exist in practice.

81. GRECO concludes that recommendation xxi has been partly implemented.

III. CONCLUSIONS

82. In view of the above, GRECO notes some progress in preventing and combating corruption among PTEFs and in the federal police, but substantial efforts still need to be made in these two areas. It concludes that Belgium has only implemented, or dealt with in a satisfactory manner, eight of the twenty-two recommendations contained in the Fifth Round Evaluation Report. Of the remaining recommendations, 10 have been partly implemented and 4 remain not implemented.

83. More specifically, recommendations v, vi, ix, xiv, xv, xvi and xxii have been implemented satisfactorily, recommendation xvii has been dealt with in a satisfactory manner, recommendations i, ii, iii, iv, viii, x, xi, xviii, xix and xxi have been partly implemented, and recommendations vii, xii, xiii and xx have not been implemented.

84. With regard to persons exercising top executive functions, progress has been minimal, the only positive development being the entry into force of the legislation bringing ministerial private offices within the scope of the law on administrative disclosure of information. Many recommendations have yet to be implemented or completed, such as those relating to gifts, post-employment restrictions or the introduction of a mechanism for sanctioning failure to comply with the rules of conduct. The terms of recruitment and employment of members of ministerial private offices still need to be regulated more strictly. A co-ordinated integrity strategy still needs to be put in place and awareness-raising and regular training on these issues need to be stepped up. The rules for managing contacts with lobbyists must be extended to members of private offices and tightened. As for the other recommendations, these are still the subject of preliminary consultations or at the stage of declarations of intent.

85. With regard to the federal police, the trend is more positive. There is increased stability at senior management level and measures have been taken to regulate outside activities more effectively. The work aimed at stepping up career-long integrity screening for police officers remains to be completed. Lastly, some recommendations have yet to be addressed, including with regard to greater effectiveness of internal control and to declarations of assets/interests by holders of certain vulnerable posts.

86. In view of the above, GRECO concludes that Belgium is not complying sufficiently 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, paragraph 2(i) and asks the Head of the Belgian delegation to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations i, ii, iii, iv, vii, viii, x, xi, xii, xiii, xviii, xix, xx and xxi) by 30 November 2026.

87. 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 the Belgian delegation – to the Minister of Foreign Affairs of Belgium, 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.

88. Lastly, GRECO invites the Belgian authorities to authorise publication of this report as soon as possible.