

# FIFTH EVALUATION ROUND

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

## SECOND COMPLIANCE REPORT

# NORWAY



Adopted by GRECO  
at its 99<sup>th</sup> Plenary meeting (Strasbourg, 17 – 19 March 2025)



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

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

## INTRODUCTION

1. The Fifth GRECO evaluation round concerns “Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions, PTEFs) and law enforcement agencies (LEA)”.
2. This Second Compliance Report assesses the measures taken by the authorities of Norway to implement the recommendations made in the [Fifth Round Evaluation Report on Norway](#) which was adopted by GRECO at its 86th plenary meeting (30 October 2020) and made public on 15 January 2021, following authorisation by Norway. The corresponding [Compliance Report](#) was adopted by GRECO at its 92nd plenary meeting (2 December 2022) and made public on 13 January 2023, following authorisation by Norway.
3. As required by GRECO’s Rules of Procedure<sup>1</sup>, the authorities of Norway submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 31 October 2024 and served, together with additional information, as a basis for this Second Compliance Report.
4. GRECO selected Sweden (in respect of top executive functions in central governments) and Albania (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed – Mr Johan DAVIDSSON for Sweden and Ms Adea PIRDENI for Albania – were assisted by the GRECO Secretariat in drawing up this report.

## II. ANALYSIS

5. GRECO addressed 14 recommendations to Norway in its Evaluation Report. In the Compliance Report, GRECO concluded that recommendations iii, iv, ix and xii had been implemented satisfactorily, recommendations i, ii, v, xi and xiii had been partly implemented and recommendations vi, vii, viii, x and xiv had not been implemented. Compliance with the outstanding recommendations is examined below.

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

### **Recommendation i**

6. *GRECO recommended that (i) dedicated training on ethics, conflicts of interest and corruption prevention is systematically provided to persons entrusted with top executive functions at the start of their term and on a regular basis throughout their term of office; and (ii) a system is established to ensure consistency of interpretation among those responsible for giving advice on ethical matters.*

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<sup>1</sup> 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.

7. It is recalled that in the First Compliance Report this recommendation was partly implemented. As regards the first part of the recommendation, GRECO noted that the authorities had to demonstrate that training was provided to PTEFs on a regular basis, and that no information was provided as regards the second part.
8. The Norwegian authorities now report that, for two years, dedicated training on ethics, conflicts of interest, and corruption prevention has been systematically provided to PTEFs at the start of their term and regularly throughout their time in office. In addition, new common guidelines were established in 2023 for the training of political leadership (government members, state secretaries, and political advisors) to take place in all ministries. They include an overview of topics that ministers will receive training on, and provide guidance on how the training should be conducted. They also clarify which responsibilities and tasks the Prime Minister's Office and the individual ministries have in terms of training, advice and guidance for members of the political leadership. Furthermore, the Handbook for Political Leadership provides political leaders with an overview and guidance on central legal regulations and guidelines that are designed to ensure trust in the decisions made by the ministries and the Government. The Handbook is continuously updated and provides guidance on issues such as ethics related dilemmas, and regulations and guidelines aimed at ensuring trust. In 2023, a routine template was established so that ministries can keep track of who receives information in specific cases and guidance on the relevant rules. In August 2024, the Handbook was updated, including stricter guidelines for buying and selling shares and a clarification of the obligation for politicians to obtain knowledge about their partner's ownership interests. In autumn 2023, the procedures for assessing eligibility in Government conferences and in the King in Council were updated.<sup>2</sup> This work is due to be pursued to ensure the appropriate update of the training courses and presentations on relevant legal regulations and guidelines. In addition, written reminders of these topics and information on relevant amendments have been and will be sent out regularly.
9. The authorities further mention that, in March 2024, Parliament requested the Government to review the training for ministries, practice and assistance to political leadership on eligibility rules, and to consider designing common best practice for all ministries based on the findings of this review.<sup>3</sup> To follow up on this decision, the Ministry of Justice and Public Security is working on processes to strengthen the quality of the training and ensure better handling of the competence regulations in all ministries.<sup>4</sup>
10. GRECO notes that dedicated initial and in-service training on ethics, conflicts of interest and corruption prevention has now been systematically provided to all government members, state secretaries, and political advisors. It also notes that relevant documents (Handbook and Guidelines) have been updated and relevant policies are in place, and are regularly updated to ensure consistency of interpretation among those responsible for giving advice on ethical matters. This is in line with the recommendation.

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<sup>2</sup> <https://www.regjeringen.no/no/dokumenter/handbok-for-politisk-ledelse2/id2478689/>

<sup>3</sup> Decision nr. 507, 5 March 2024.

<sup>4</sup> [https://www.regjeringen.no/contentassets/c8070f16343e471bb0cf419d43695807/nn-no/pdfs/prp202420250001\\_jdddpdfs.pdf](https://www.regjeringen.no/contentassets/c8070f16343e471bb0cf419d43695807/nn-no/pdfs/prp202420250001_jdddpdfs.pdf)

11. GRECO concludes that recommendation i has been implemented satisfactorily.

**Recommendation ii**

12. *GRECO recommended (i) introducing rules/principles and guidance on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties seeking to influence governmental processes and decisions, and (ii) increasing the transparency on the purpose of such contacts (formal and informal), such as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion.*
13. It is recalled that in the First Compliance Report this recommendation was partly implemented. More precisely, GRECO noted as regards the first part of the recommendation that PTEFs were requested to register and archive all correspondence from third parties. However, there was room for improvement for guidance in this respect. With regard to the second part of the recommendation, GRECO noted that the information registered on the conclusions of the meetings with lobbyists and other third parties was not routinely made public.
14. The Norwegian authorities now indicate that the Handbook for Political Leadership was updated in October 2024 to include guidelines and concrete examples for contact with lobbyists and other third parties. The Handbook contains definitions of lobbying and lobbyists and provides that the rules on document and information management, including the rules in the Freedom of Information Act and the archive regulations, apply to such contacts. A duty to document such contacts may exist in certain cases, and the Handbook includes examples differentiating cases where this documentation is or is not required. The authorities indicate that no measure has been taken yet as regards routine disclosure to the public online of written summaries of meetings between PTEFs and lobbyists.
15. GRECO welcomes that, in addition to the obligation for PTEFs to register and archive all correspondence received from third parties, rules and guidance have been introduced on how PTEFs should engage in contacts with lobbyists and third parties, which is in line with the first part of the recommendation. With regard to the second part of the recommendation, GRECO does not note any progress on making information public on the contacts between PTEFs and lobbyists and other third parties since the Evaluation Report was issued. Therefore, this part of the recommendation cannot be considered as implemented.
16. GRECO concludes that recommendation ii remains partly implemented.

**Recommendation v**

17. *GRECO recommended developing general guidelines to address the conflicts of interest that can arise from former private activities when an individual comes into government service as a top executive official and when a person entrusted with top executive*

*functions is negotiating for a new position outside of government service if the negotiations occur before leaving public office.*

18. It is recalled that in the First Compliance Report this recommendation was partly implemented. GRECO noted that concrete and specific guidance or procedures on relationships that would lead to disqualification from dealing with a matter were lacking, namely to address situations of conflicts of interest that may arise from the phenomenon of “revolving doors”.
19. The Norwegian authorities now report that a number of guidelines appear in the Handbook for Political Leadership which address situations of conflicts of interest that may arise from former private activities or new positions outside of government service, in particular to require a written consent from the Prime Minister or the Chief of Staff at the Prime Minister’s Office to grant an employee leave to take up a position in the government service or to allow paid or unpaid post-public employment. The Handbook also provides examples to guide the impartiality self-assessment to be carried out by the person concerned.
20. The authorities further indicate that, since August 2023, a general trade prohibition is applied to all PTEFs. Indeed, the Handbook provides that anyone who upon taking office holds shares or other financial instruments covered by the guidelines must choose between selling, or freezing the shares, or establishing a management arrangement, and inform the Chief of Staff at the Prime Minister’s Office in writing about the options chosen. Moreover, they indicate that the Quarantine Act provides that a current or former member of political leadership cannot take up a position or office outside the state administration or establish a commercial activity before the Committee on post-public employment restrictions (Quarantine Committee) has considered whether a quarantine or prohibition of handling cases should be imposed in the context of the transfer. The Handbook provides for a detailed explanation of the rules on quarantine.<sup>5</sup> Decisions of the Quarantine Committee are made available to the public<sup>6</sup> and provide guidance for handling situations where a PTEF takes up a position or office outside the state administration or establishes a commercial activity.
21. GRECO welcomes the guidelines included in the Handbook for Political Leadership to address conflicts of interest that concern PTEFs both when they enter the public function or when they negotiate a new position outside this public function. They add to the rules on disqualification applied to ministers when they act as members of government and to the exercise of secondary activities by PTEFs subject to written authorisation which had already been welcomed by GRECO in the previous compliance report. This is in line with the recommendation.
22. GRECO concludes that recommendation v has been implemented satisfactorily.

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<sup>5</sup><https://www.regjeringen.no/no/dokumenter/handbok-for-politisk-ledelse2/id2478689/?ch=9>

<sup>6</sup><https://www.regjeringen.no/no/dep/dfd/org/styrer-rad-og-utvalg-under-digitaliserings-og-forvaltningsdepartementet/karantenenemnda/avgjorelser-fra-karantenenemnda/id2472135/>

## **Recommendation vi**

23. *GRECO recommended that (i) state secretaries and political advisers be subject to the same disclosure requirements as ministers; (ii) consideration be paid to requiring the same information for spouses and dependent family members (it being understood that such information of close relatives does not necessarily need to be made public); and (iii) disclosures be filed electronically in a manner that would eliminate the possibility of transcription errors on the part of the registrar.*
24. It is recalled that in the First Compliance Report this recommendation was not implemented as GRECO noted that work in this field was at an incipient stage.
25. The Norwegian authorities now report that, through the amendments to the Law and Regulation on the Registration of the Offices and Financial Interests of Members of the Government (Royal Decree of 2 February 2024), state secretaries and political advisers are now subject to the same disclosure requirements as members of the government and that the information registered is made public.<sup>7</sup> The registration requirement is described in the Handbook for Political Leadership.<sup>8</sup> An assessment is underway as regards the information to be possibly disclosed by spouses and dependent family members.
26. The authorities further indicate that state secretaries and political advisers are required to report offices and financial interests to an electronic register managed by the Norwegian Government Security and Service Organisation in such a technical way that possibilities of transcription errors on the part of the registrar are eliminated. A consultation paper on possible further amendments to the relevant legislation is under preparation to strengthen the system.
27. GRECO welcomes the amendments to the relevant law and regulation, as well as the practical guidance, which apply to state secretaries and political advisers the same disclosure requirements as for ministers. This is in line with the first part of the recommendation. It also notes that the information disclosed is filed electronically and that measures have been taken, and are due to be further strengthened, to eliminate possibilities of transcription errors on the part of the registrar, which is in line with the third part of the recommendation. GRECO further notes that consideration is being given to financial disclosure of spouses and dependent family members of the relevant PTEFs as recommended in the second part of the recommendation, and is hopeful that such a process will further advance the issue at stake.
28. GRECO concludes that recommendation vi has been dealt with in a satisfactory manner.

## **Recommendations vii and viii**

29. *GRECO recommended that:*

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<sup>7</sup><https://www.regjeringen.no/no/om-regjeringa/verv-og-okonomiskeinteresser/id3025637/?expand=factbox3025639>

<sup>8</sup> <https://www.regjeringen.no/no/dokumenter/handbok-for-politisk-ledelse2/id2478689/?ch=7>

- *(i) enforceable sanctions are enacted for failing to file or knowingly false statements on the disclosure reports; (ii) a formal system or systems for review of the declarations of persons entrusted with top executive functions be established, and (iii) the reports filed be used for counselling purposes regarding the application of the rules dealing with disqualification, outside activities and positions, and gifts (recommendation vii); and*
  - *the standards set forth regarding conflicts of interest, incompatibilities, outside activities, gifts and relations with lobbyists and third parties be subject to credible and effective control and sanctions (recommendation viii).*
30. It is recalled that in the First Compliance Report these recommendations were not implemented as GRECO noted that efforts in these fields were only in the early stages.
31. The Norwegian authorities now report on a consultation paper concerning possible amendments to the legislation according to GRECO's expectations as regards the effective enforcement of the PTEFs' integrity system. They recall that, beyond their political responsibility vis-à-vis public opinion, the Prime Minister could dismiss members of government and state secretaries in accordance with Article 22 of the Constitution, as well as political advisers, if they violate the integrity system. They also note that members of the government are subject to parliamentary oversight. Furthermore, the Penal Code provides for fines or imprisonment for any person who grossly breaches his/her official duty when exercising or assisting with the exercise of public authority. Therefore, the preliminary assessment of the consultation paper by the authorities is that no further sanctions are necessary to ensure the proper enforcement of the integrity system (including the applicable disclosure requirements). They stress that PTEFs exercise their duties under the control of the media, the political parties and public opinion, and that possible political sanctions remain more efficient than additional formal legal sanctions. The authorities add that the regular sending out of written reminders and information about any updates regarding PTEFs' duties to register their positions and financial interests is planned.
32. The authorities also mention that the public information in the registers can be used for counselling purposes regarding the application of the rules dealing with integrity-related matters. They note that the Handbook for Political Leadership contains central legal regulations and guidelines regarding access to outside activities, positions and gifts, and that the third part of recommendation vii will be further discussed in the abovementioned consultation paper.
33. GRECO records no real progress in this area, as compared to the situation assessed in the Fifth Round Evaluation Report. As stated then, GRECO reiterates that political and criminal responsibility are not sufficient to guarantee the credibility and the proper enforcement of integrity systems aimed at PTEFs. Specific sanctions must apply when failing to meet the relevant ethical/integrity requirements. Further, nothing has been said as to the establishment of a formal system for reviewing the interest and asset declarations. Finally, while the authorities indicate that disclosure reports can be used

for counselling purposes, no details have been submitted regarding their actual use. All in all the action taken on these fronts remains very limited.

34. GRECO concludes that recommendations vii and viii remain not implemented.

*Preventing corruption and promoting integrity in law enforcement agencies*

**Recommendation x**

35. *GRECO recommended that the implementation of the Code of Conduct is supported by a more uniform, coordinated and comprehensive approach, including by (i) further enhancing in-service training programmes and awareness raising measures on integrity and professional ethics; and (ii) providing systematic confidential counselling on these matters.*
36. It is recalled that in the First Compliance Report this recommendation was not implemented. GRECO was expecting the Code of Conduct and the subsequent training to be revised. It noted that the police is requested locally to register action taken in risk prone areas, as well as training and implementation activities. It further noted that no information was provided as regards confidential counselling.
37. The Norwegian authorities now report that the Police Code of Conduct has been supplemented<sup>9</sup>, with the active participation of police trade unions, on the basis of learning points from relevant cases investigated by the Norwegian Bureau for the Investigation of Police Affairs, complaints about the police, cases related to disciplinary sanctions and input from consultations. This revision has taken into account new requirements regarding independence, impartiality and conflict of interest for employees in the public sector. The revision concerns the use of social media, personal relations at the workplace, gifts and hospitality, additional activities and freedom of expression. It also addresses the management of private assets for certain groups of police employees aligned to the law for state employees. The Police Directorate has developed a national Dilemma archive, aimed at clarifying grey zone cases and increasing ethical awareness in the framework of the Police Code of Conduct, with examples, presentations, and lessons learnt, regarding *inter alia* secondary employment and activities, corruption, bribery and whistleblowing. This Dilemma archive was made available on the Police Intranet on 10 March 2025. A train-the-trainer course on the Code of Conduct and the use of the Dilemma archive has been provided to all police districts and expert units since November 2024 and continues in 2025. Police managers are required to perform dilemma training for all employees annually. The Dilemma archive contains dilemmas related to relevant subjects and will be updated continuously. The police chiefs in the police districts and expert units are responsible to make the Code of Conduct known within their organisation. A contact person will be appointed in each police district and expert unit who will cooperate with the Police Directorate for implementing the Code.

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<sup>9</sup> The revised Police Code of Conduct was formally approved by the National Police Commissioner on 24 October 2024.



38. Together with the Code of Conduct, a register for gifts is due to be set up. A national routine description for registering positions and financial ownership has been approved by the National Police Commissioner. The national register for gifts and the national register for positions and ownership are due to be operational in April 2025. The authorities also indicate that in 2022, the national focus area for internal control was ethics and anti-corruption. A template was made available for the police districts and expert units to report to the National Police Directorate on their systematic work on ethics and prevention of fraud and corruption, including their work on risk prone areas and on the relevant training carried out.
39. Concerning confidential counselling, the authorities indicate that the ethics and anti-corruption group must provide advice and guidance. The Police Service is exploring technical solutions for sending anonymous requests, possibly through anonymous e-mail questioning. In addition, an arrangement for colleague support has been put in place, as a low threshold service available to all employees who need support as a result of job-related incidents / workload / life changing events. All police districts and expert units should have a colleague support coordinator and at least one colleague support representative. The arrangement is built on trust and confidentiality. Moreover, employees in a difficult situation can address the safety representative who has a role in the psycho-social work environment. Furthermore, the function of Profession and Training Responsible has been created within all police districts and expert units, and in the main areas of police activity (investigation, operation centres, enforcement, ...). They are entrusted *inter alia* with making employees aware and conscious of integrity issues and work ethics. In December 2024, an arrangement for anonymous mail/physical letters from employees in the National Police Service to the Ethics and Anti-corruption Group was launched. Answers from the Ethics and Anti-corruption Group to anonymous questions sent by mail/physical letter regarding the interpretation of the Code of conduct and related regulations will be published on the Police intranet (FAQ). A national procedure for this arrangement has been published on the Police Service's intranet.
40. GRECO takes note that the Police Code of Conduct has been revised to strengthen integrity-related matters, and has been supplemented by subsequent concrete guidance, systematic mandatory training and specific measures within the police organisation aimed at ensuring the awareness of all police staff on the Code. This is in line with the recommendation. In addition, GRECO notes that, although the authorities have not set up a dedicated system for providing systematic confidential counselling on ethics and integrity, all police staff now have the possibility to consult confidentially dedicated staff in the exercise of his/her functions, including on ethics and integrity matters. This is in line with the purpose of the recommendation.
41. GRECO concludes that recommendation x has been dealt with in a satisfactory manner.

#### **Recommendation xi**

42. *GRECO recommended taking additional measures to reinforce the role of integrity matters in internal recruitment processes, as well as the carrying out of integrity checks*

*of employees in the police force at regular intervals depending on their exposure to corruption risks and the required security levels.*

43. It is recalled that in the First Compliance Report this recommendation was partly implemented. GRECO was still expecting to be able to assess measures that had been taken to strengthen integrity-checks both when recruiting police staff and during their career and encouraged the authorities to make them applicable and mandatory.
44. The Norwegian authorities now report that it has become standard procedure that a hyperlink to the Police Code of Conduct is included in job advertisements. The template for job interviews in connection with the recruitment of top managers led by the Police directorate now contains questions about ethical conscious leadership, and corruption and includes standard questions related to suitability, certificates of good conduct, security clearance (in those positions where it is needed) and secondary employment. Templates for performance appraisals of both managers who lead managers and managers who lead co-workers have also been revised to include ethical appraisal.
45. The authorities further indicate that, following the audit of the Police Service Instruction for Personal Security, a certificate of good conduct may be requested for internal transfers, temporary secondments, external project participants in accordance with the Norwegian Police records.<sup>10</sup> A Regulation on Suitability Assessments is under preparation and the procedures for obtaining certificates will be reviewed, in particular to facilitate the collection of information and the use of electronic references. If the job analysis concludes that a background check should be carried out, this can then be done according to the relevance of the position to be filled, as this demands using extra resources. The clearance authority can emphasise matters relevant to the security clearance, including with respect to reliability, loyalty and judgement in connection with the handling of sensitive information. Those matters might be for example criminal acts, circumstances that might lead to pressure situations, abuse of alcohol or illegal drugs, financial situation, or connection to other states.<sup>11</sup> If circumstances lead the Norwegian Police Service to suspect that an employee is not trustworthy, this might result in the loss of the security clearance or a resignation.
46. GRECO notes that an appropriate set of measures have been taken and has entered into force to strengthen systematic integrity-checks both when recruiting police staff and during their career, including through appropriate templates for job interviews of candidates for top management positions, or the possibility to request a certificate of good conduct for filling specific vulnerable positions. This operational system is in line with the recommendation. The system will be further completed in order to facilitate the collection of information and the use of electronic references.
47. GRECO concludes that recommendation xi has been implemented satisfactorily.

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<sup>10</sup> Act § 36-1 number 3.

<sup>11</sup> For more details, see the Appendix to the Report on work on ethics and anti-corruption in the Norwegian Police Service for 2023.

### **Recommendation xiii**

48. *GRECO recommended conducting dedicated training and awareness-raising activities on whistleblowing for all levels of hierarchy and chains of command in the police.*
49. It is recalled that in the First Compliance Report this recommendation was partly implemented. GRECO asked for additional information regarding e-learning activities which were just underway at the time. It also noted ongoing/envisaged improvements of the whistleblowing protection regime, notably regarding reporting channels and supervision arrangements (anticipated establishment of an Ombudsperson competent for whistleblowing).
50. The Norwegian authorities now indicate that an independent Ombudsperson for whistleblowing has been operational within the National Police Service since 1 July 2024. His/her office is headed by a professor in law and includes other members with legal, organisational, investigation and employee support backgrounds. Employees in the Police Service can send whistleblowing cases to the Ombudsperson, who can also be seized by the main safety representatives and trade unions. The establishment of the Ombudsperson has been advertised in the media and on the Police Service's intranet. Information about the Ombudsperson and its mandate for handling whistleblowing cases can also be found on the Norwegian Civil Affairs Authority's website.<sup>12</sup> Police staff can also send whistleblowing cases to an external whistleblowing channel operated by a law firm or to the employer. The whistleblowing procedures are under revision by the Head of the National Authority for Investigation and Prosecution of Economic and Environmental Crime (ØKOKRIM) and have been subject to extensive review internally - representatives from all police districts, expert units, safety representatives and trade unions have been consulted.
51. An e-learning course about whistleblowing aimed at all co-workers, managers at all levels, safety representatives and trade unions is available on the police Intranet (competence portal) and is due to be updated according to the new procedures when appropriate. In addition, whistleblowing is addressed as a separate topic in the Dilemma archive, available to all employees in the Norwegian Police Service.
52. GRECO welcomes the updates provided by the authorities which display their efforts to advance whistleblowing protection, including through the establishment of a specific independent Ombudsperson system dedicated to whistleblowing and the ongoing review of procedures. This system has been properly advertised on the Police Service's intranet. Furthermore, this system is part of an e-learning process available to all police staff and institutions, completed by specific guidance and examples on whistleblowing addressed in the Dilemma archive available to all police staff.
53. GRECO concludes that recommendation xiii has been implemented satisfactorily.

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<sup>12</sup> <https://www.sivilrett.no/varslingsombudet.politiet>

#### **Recommendation xiv**

54. *GRECO recommended establishing national statistics on disciplinary measures and clearly communicating them to the public, while respecting the anonymity of the persons concerned.*
55. It is recalled that in the First Compliance Report this recommendation was not implemented. While the authorities reported their intention to establish a new electronic system to track disciplinary measures, this had yet to materialise in practice.
56. The Norwegian authorities now report that In May 2023, functionalities for registering additional data were introduced in the archive system of the Police Service (WebSak), making it possible to produce statistics on disciplinary sanctions in an aggregated anonymous form. A guidance document for registering disciplinary cases has been issued. Between May and December 2023, 18 disciplinary sanctions were registered. These statistics are included in the Police Service annual report which is made public on the national Police Service website. Statistics for 2024 are included in the 2024 Police Service Annual Report and the Report on ethics and anticorruption, published in March 2025.
57. GRECO notes that national statistics on disciplinary measures against police staff are now regularly registered through the archive system of the Police Service and made public in the Police Service Annual Report, published on the Police service website.
58. GRECO concludes that recommendation xiv has been implemented satisfactorily.

### **III. CONCLUSIONS**

59. **In the light of the foregoing, GRECO concludes that Norway has implemented satisfactorily or dealt with in a satisfactory manner eleven of the fourteen recommendations set out in the Fifth Round Evaluation Report.** Of the remaining recommendations, one has been partly implemented and two have not been implemented.
60. More specifically, recommendations i, iii, iv, v, vi, ix, x, xi, xii, xiii and xiv have been implemented satisfactorily, recommendation ii has been partly implemented and recommendations vii and viii have not been implemented.
61. As regards persons entrusted with top executive functions (PTEFs), dedicated initial and in-service training on ethics, conflicts of interest and corruption prevention is provided to all government members, state secretaries, and political advisors. Relevant guidance on various integrity-related matters has been updated and policies put in place to make PTEFs aware of their relevant obligations as well as to ensure consistency of interpretation among those responsible for giving advice to PTEFs on ethical matters. Specific and effective measures are needed to address proper non-criminal sanctions for breaches of ethical standards and integrity rules. More can be done to increase

transparency of contacts between PTEFs and third parties, including through routine disclosure.

62. As far as law enforcement is concerned, GRECO commends the Police for having complied with all recommendations. A policy for ethics and anti-corruption within the Police has been implemented, and an ethics and compliance team has been established for assessing the implementation of this policy. The Police Code of Conduct has been revised to strengthen integrity-related matters and has been supplemented by subsequent concrete guidance, systematic mandatory training and appropriate awareness-raising measures. Each police staff has the possibility to consult confidentially dedicated staff on ethics and integrity matters. A set of measures has entered into force to strengthen systematic integrity-checks when recruiting police staff and during their career. An independent Ombudsperson system dedicated to whistleblowing has been set up and the relevant procedures are being reviewed. This system is part of an e-learning process available to all police staff, completed by specific guidance. Disciplinary sanctions against police officers are registered through an electronic system and made public.
63. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Second Compliance Report terminates the Fifth Round compliance procedure with respect to Norway. The Norwegian authorities may, however, wish to inform GRECO of the developments concerning the implementation of recommendations ii, vii and viii which remains incomplete.
64. GRECO invites the authorities of Norway to authorise as soon as possible the publication of the present report, to translate it into the national language and to make this translation public.