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FIFTH EVALUATION ROUND

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

COMPLIANCE REPORT

PORTUGAL



Adopted by GRECO
at its 99th 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

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 Compliance Report assesses the measures taken by the authorities of Portugal to implement the recommendations made in the Fifth Round Evaluation Report on Portugal which was adopted by GRECO at its 93rd plenary meeting (20-24 March 2023) and made public on 10 January 2024, following authorisation by Portugal ([GrecoEval5Rep\(2022\)3](#)).
3. As required by GRECO’s Rules of Procedure,¹ the authorities of Portugal submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report and its addendum were delivered on 30 September and 1 October 2024 respectively. They served as a basis for this report.
4. GRECO selected Serbia (in respect of top executive functions in central governments) and Norway (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed – Ms. Bojana Smartek for Serbia and Ms Hanna Olsen Bodsberg for Norway – were assisted by the GRECO Secretariat in drawing up this report.
5. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and gives an overall appraisal of the level of the member’s compliance with these recommendations. The implementation of any outstanding recommendations (partly or not implemented) will be assessed on the basis of a further Situation Report to be submitted by the authorities 18 months after this Compliance Report is adopted.

II. ANALYSIS

6. GRECO made 28 recommendations to Portugal in its Evaluation Report. Compliance with these recommendations is dealt with below.

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

Recommendation i

7. *GRECO recommended that (i) rules on integrity checks apply to all persons with top executive functions, ahead of their appointment, in order to identify and manage existing and potential conflicts of interest; (ii) the information provided be cross-checked, and the results be published upon their appointment in office; and (iii) the area of competence and specific duties of all members of ministerial cabinets, including the Prime Minister’s, be published online and kept up to date*

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.

8. Regarding the first part of the recommendation, the authorities refer to the questionnaire which is addressed to potential candidates to join the Government as a Deputy Prime Minister, Minister, Secretary of State and Undersecretary of State (the questionnaire is dealt with in paragraph 30 of the Fifth Round Evaluation Report on Portugal). Once completed by a candidate, the questionnaire is classified as national secret. This questionnaire was completed by the members of the XXIV Constitutional Government, which took office on 2 April 2024. The authorities also report that the new [Code of Conduct of the XXIV Constitutional Government](#)² (adopted in April 2024) provides for the possibility of obtaining an opinion from the competent services on the possible existence of conflicts of interest, including prior to the appointment of the person concerned (Article 7(1) and (2)). In particular, the Prime Minister may request such an opinion with regard to members of the Government and the latter with regard to members of their respective Cabinets.
9. With regard to the competent services, the authorities indicate that formerly the General Secretariat of the Presidency of the Council of Ministers (SGPCM), and currently the newly established General Secretariat of the Government (GSG) is responsible for assisting and monitoring members of the Government and members of their respective cabinets in relation to their transparency obligations³. In particular, the Transparency Unit of this institution can, upon request, assess the existence of incompatibilities and conflicts of interest and issue formal opinions in this regard. In addition, the *Centro Jurídico do Estado* (State Legal Centre), which provides legal assistance, advice and consultancy to the Council of Ministers, members of the Government and central services and entities of the public administration, may also issue opinions in this respect.
10. With regard to integrity checks for cabinet members, the authorities point out that, given the sheer number of people in this category (around 600), the requirement for pre-appointment checks could hamper the effective commencement of the Government's work. For this reason, post-appointment checks involving the Transparency Unit are a more appropriate mechanism.
11. As regards the second part of the recommendation, the authorities inform GRECO that in 2024, the Transparency Unit issued 23 opinions at the request of various government cabinets. In this context, the authorities also refer to various awareness-raising activities of the Transparency Unit (briefings with members of the government, confidential advice, the new version of the Transparency Guide, etc.).
12. As regards the third part of the recommendation, the authorities refer to the requirement to publish the appointment orders for all members of the Government Cabinets, including the Prime Minister's Office (this requirement is set out in Article 18 of Decree-law No. 11/2012 and was assessed in the Fifth Round Evaluation Report on Portugal, paragraph 32). With regard to experts (*técnicos especialistas*), the authorities point out that, in accordance with Article 12(d) of the above-mentioned Decree-law,

² Resolution of the Council of Ministers (RCM) no. 64/2024, of 24 April 2024.

³ Article 3(1)(d) of Annex I of [Decree-Law no. 43-B/2024](#), of 2 July 2024

their specific tasks should be indicated in the appointment orders. This information is published on the Government's website⁴. The authorities note that the specific duties of each Cabinet member are not necessarily defined at the start of their functions, but the Transparency Unit may take them into account when considering the existence of a conflict of interest. In any event, the Transparency Unit intends to issue a recommendation calling for more detailed disclosure of such duties to the public.

13. GRECO takes note of the above information. As regards the first part of the recommendation, the possibility to seek a formal opinion on the existence of conflicts of interest prior to the appointment of the person concerned is undoubtedly a positive development, especially as it concerns *all* persons with top executive functions (PTEFs) – that is, members of the government and members of the Prime Minister's and Minister's cabinets. GRECO observes, however, that this procedure is not mandatory and that the relevant statutory provision does not indicate in which cases it should be resorted to. Moreover, the authorities do not provide information on the details of the procedure and the total number of the opinions actually obtained in the context of the appointment of members of the XXIV Constitutional Government and members of their respective cabinets. Given that the latter category is not required to complete the integrity questionnaire, it remains unclear to what extent they are in practice subject to pre-appointment checks. GRECO takes note of the authorities' argument regarding the difficulty of organising such checks for cabinet members in view of their large number. This is indeed a challenging task requiring a systemic approach and inter-institutional synergies. However, GRECO has already underlined the importance of pre-appointment checks in order to avoid conflicts of interest (see paragraph 32 of the Evaluation Report). They are all the more necessary given the lack of clarity regarding post-appointment checks. It is not claimed that cabinet members are systematically subject to integrity checks shortly after their appointment. In sum, GRECO invites the authorities to clarify all the above points in the relevant legal framework and to ensure that integrity checks are effectively carried out in respect of *all* PTEFs. In GRECO's view, this part of the recommendation is partly implemented.
14. As regards the second part of the recommendation, GRECO appreciates the possibility to consult the Transparency Unit of the SGPCM in the context of pre-appointment verifications. However, such a possibility is not identical to a regular mechanism allowing effective cross-checking of the information provided by candidates. Further, it does not appear that the verification results are published upon the candidates' appointment. GRECO can therefore only consider this part of the recommendation as partly implemented.
15. As for the third part of the recommendation, the authorities essentially refer to the publication practice already in place at the time of the evaluation visit. The appointment orders published on the Government's website contain summaries of curricula vitae and thus shed light on the areas of responsibility of the members of the ministerial cabinets. While their specific duties are not indicated, GRECO takes note of the authorities' intention to disclose more information in this respect and looks forward to receiving an

⁴ [Nomeações - XXIV Governo Constitucional.](#)

update in due course. This part of the recommendation should also be considered as partly implemented.

16. GRECO concludes that recommendation i has been partly implemented.

Recommendation ii

17. *GRECO recommended that that the National Anti-Corruption Strategy be accompanied by a dedicated action plan for its implementation in practice.*
18. The authorities point out that the National Anti-Corruption Strategy 2020-2024 and the related Action Plan have expired. Pending the adoption of the new strategy for the period 2025-2028 and the related action plan, and on the basis of public consultations, the Government has approved the Anti-Corruption Agenda, which consists of a set of measures in the areas of prevention, education and repression. Resolution No. 72-A/2024 of the Assembly of the Republic established an ad hoc committee to monitor the implementation of this Agenda. The Agenda is accompanied by a technical report which provides specific details of the proposed measures. In particular, it is planned to assess the effectiveness of the 2020-2024 Strategy, to ensure the publication of the assessment report in cooperation with the National Anti-Corruption Mechanism (MENAC) and, on the basis of its conclusions, to prepare the new Strategy for the period 2025-2028. The Action Plan for this period is already being prepared. These measures are already included in MENAC's draft Activity Plan for 2025. The authorities also refer to the launch of MENAC's monitoring activities under the General Regime for the Prevention of Corruption⁵ (RGPC) and to MENAC's Recommendation no. 1 of 26 February 2024 which urges government bodies to adopt the instruments required by the RGPC (sectoral codes of conduct, corruption risk prevention plans, etc.).
19. GRECO takes note of this information and welcomes the authorities' initiative to carry out a thorough evaluation of the results of the Anti-Corruption Strategy 2020-2024 in order to provide a solid basis for the new Strategy covering the next four years. GRECO has indeed underlined the need to monitor the implementation of the Strategy and trusts that the authorities will take this need into account when drafting the new Strategy and Action Plan. GRECO also appreciates the adoption of the Anti-Corruption Agenda, which identifies priority areas and some performance indicators, thus providing important guidance until the adoption of the new Strategy and Action Plan, as well as the establishment of a special committee to monitor its implementation. GRECO notes that the technical report annexed to the Agenda describes specific measures without, however, setting timeframes or defining the competent authorities and their roles. This is regrettable as GRECO has stressed the importance of these features for a functional Action Plan (see Evaluation Report, paragraph 41). Although GRECO has not received the Action Plan valid until the end of 2024, it invites the authorities to take these comments into account when drafting the new Action Plan. GRECO looks forward to receiving the new Strategy and Action Plan in due course.
20. GRECO concludes that recommendation ii has been partly implemented.

⁵ See Fifth Round Evaluation Report on Portugal, paragraph 46.

Recommendation iii

21. *GRECO recommended that, as a matter of priority, the National Anti-Corruption Mechanism become fully operational, in practice, by providing it with adequate measures and appropriate resources (financial, personnel, administrative, legal, etc.)*
22. The authorities report that MENAC has been declared operational by Ordinance no. 155-B/2023 of 6 June 2023. All its governing bodies have been constituted: President; Vice-President; Advisory Board (composed of 13 inspectors from different ministries - an arrangement that facilitates inter-institutional cooperation); Monitoring Committee (composed of 6 inspectors); and Sanction Commission (composed of 4 inspectors). In accordance with Decree No. 292-A/2022 of the Presidency of the Council of Ministers and the Ministry of Finance, the staff of MENAC comprises 27 posts. Between 6 June 2023 and 31 May 2024, MENAC increased its staff by nine persons. At 31 December 2024, 12 posts were filled⁶. MENAC has started its monitoring activities, issued a number of recommendations and prepared several guidance documents on the RGPC, as well as the training plan for all directors, managers and employees of public and private organisations. In terms of IT resources, the MENAC institutional website⁷ has been operational since July 2023. An electronic platform⁸ for the processing and storage of materials submitted by various entities for the purpose of MENAC's monitoring of their compliance with the RGPC was launched in November 2024, and it is expected that an artificial intelligence component will be integrated into it by 2025. Regarding the legal framework, the legal provisions governing the sanctioning mechanism under the RGPC entered into force in July 2023. In terms of financial resources, the state budget allocated €2.1 million to MENAC in 2023 and €2.55 million in 2024. A further €996,000 was allocated through an investment contract for the development of the monitoring information system for the National Anti-Corruption Strategy. The authorities recognise the need to provide MENAC with further human and IT resources and are working on the necessary solutions. They indicate that the new Anti-corruption Agenda (see paragraph 16 above) includes measures to promote the full effectiveness of MENAC.
23. GRECO takes note of this information and appreciates the measures taken so far by the Portuguese authorities to provide MENAC with the necessary resources and to ensure its technological modernisation. It is an important achievement that MENAC has become operational and has taken on a significant number of its tasks⁹. GRECO notes the authorities' commitment to ensure the effective functioning of MENAC and looks forward to receiving an update in due course on the additional resources (in particular staff) allocated and further measures taken in this respect.
24. GRECO concludes that recommendation iii has been partly implemented.

⁶ A Secretary General, 5 advisors and 6 technical and administrative support staff. In addition, a further 2 senior technicians and 2 technical assistants are expected to join in the short term.

⁷ <https://mec-anticorrupcao.pt/.s>

⁸ [Plataforma RGPC entra em funcionamento - MENAC Mecanismo Nacional Anticorrupção](#)

⁹ See [EC Rule of Law Report \(2024\)](#), p. 15.

Recommendation iv

25. *GRECO recommended that (i) a plan for the prevention of risks of corruption specific to persons with top executive functions, comprising the identification of integrity-related risks and appropriate remedial measures, be established and published online, and (ii) the plan be subject to regular monitoring by the National Anti-Corruption Mechanism, making public its findings and recommendations as well as the responses of the authorities.*
26. The authorities report that Article 11 of the new [Code of Conduct of the XXIV Constitutional Government](#) requires the Government to adopt the PRR within 180 days. The adoption and implementation of the PRR is to be carried out in liaison with MENAC. MENAC and the Transparency Unit of the SGPCM have formed a working group to develop the required risk prevention plan (PPR) for members of the Government and cabinet members. A draft plan, which is confidential at this stage, has recently been submitted to the Office of the Secretary of State for the Presidency of the Council of Ministers (SEPCM) and is expected to be approved in March 2025¹⁰. Article 12 of the above Code of Conduct also provides for the establishment of the Government's whistleblowing channel, and procedures are being developed to make it operational. The newly established General Secretariat of the Government is responsible for supporting the adoption, implementation and enforcement of the Government's Code of Conduct and Risk Prevention Plan, as well as ensuring the management of the Government's whistleblowing channel¹¹.
27. GRECO takes note of the work accomplished to develop the PRR and looks forward to receiving this document when adopted. GRECO appreciates that the role of MENAC in the implementation of the PRR has been expressly provided for in the Government's Code of Conduct. GRECO trusts that the relevant monitoring procedures will be developed in due course. GRECO also welcomes the authorities' initiative to establish the Government's whistleblowing channel.
28. GRECO concludes that recommendation iv has been partly implemented.

Recommendation v

29. *GRECO recommended that the Code of Conduct for persons with top executive functions (i) be revised and complemented with additional provisions containing clear guidance regarding conflicts of interest and other integrity related matters (such as gifts, contacts with third parties, outside activities, contracts with State authorities, the handling of confidential information and post-employment restrictions), and (ii) be coupled with a credible and effective mechanism of supervision and sanctions.*
30. The authorities submit that the [Code of Conduct of the XXIV Constitutional Government](#), adopted in April 2024, contains specific provisions on conflicts of interest, gifts and

¹⁰ The Portuguese authorities informed GRECO shortly before its 99th plenary meeting that the PPR had been approved by the Council of Ministers on 13 February 2025 (see [press release](#), point 1 (e)). This development, and its effective implementation, will be examined in the next reporting exercise.

¹¹ Article 3(j) of Annex I of Decree-Law no. 43-B/2024 of 2 July 2024. Article 12 of the [Code of Conduct of the XXIV Constitutional Government](#).

hospitality. In accordance with its Article 13, the Code is to be amended within 60 days of any relevant legislative developments in the areas of the fight against corruption, transparency, the representation of private interests and the regulation of contacts. For practical guidance, the authorities refer to transparency guides¹² prepared by the SGPCM's Transparency Unit, which also plans to start publishing a weekly newsletter with practical examples. As regards sanctions, the new Code incorporates the relevant provisions¹³ of the previous Code (see paragraph 52 of the Evaluation Report). In addition, Article 5 § 2 of the new Code states that the political accountability of members of the Government to the Prime Minister may include dismissal in the event of a serious or repeated breach of the Code of Conduct. The authorities emphasise that the Code of Conduct, being soft law, does not allow for sanctions other than those of a strictly political nature (such as dismissal). Other types of sanctions are therefore provided for in other legal instruments. The authorities recall that Law no. 52/2019 on the regime governing the exercise of functions by political officeholders and senior public officeholders ("the Political and Senior Public Officeholders Act") already provides for sanctions (notably Articles 11, 16 § 9 and 18 of the Law; see paragraphs 107, 110-111 of the Evaluation Report).

31. GRECO takes note of the new Government's Code of Conduct. It contains a number of useful developments as compared to the Code of Conduct of the previous Government, such as the systematic updating of the Code in line with the relevant legislation, the possibility to obtain a formal opinion on the existence of a conflict of interest, etc. Regrettably, however, it has not become a single repository for all integrity issues and standards (many such issues remain essentially regulated by the Political and Senior Public Officers Act). In this context, GRECO reiterates the importance of consolidating all integrity rules in a single document.
32. As regards the material scope of the new Code, the missing elements identified in this recommendation (e.g. contacts with third parties) have not been added. The new Code does not indicate the procedure and the decision-making body in case the Prime Minister is faced with a situation of conflict of interest¹⁴ (a gap identified in paragraph 79 of the Evaluation Report with regard to the Code of Conduct of the previous Government). GRECO also notes that there is still a lack of detailed practical guidance on all integrity issues. The transparency guides prepared by the SGPCM's Transparency Unit and adapted to different categories of PTEFs provide a useful basis for such guidance (in particular the section on transparency obligations), but they need to be complemented with real-life examples of situations posing risks to the integrity of PTEFs and explanations on how to address these risks. Such practical guidance should also be

¹² <https://www.sg.pcm.gov.pt/o-governo/guias-praticos/> (see paragraphs 54-55 of the Fifth Round Evaluation Report on Portugal).

¹³ Failure to comply with the provisions of the Code of Conduct implies political accountability towards the Prime Minister, in the case of the members of the Government, or accountability towards the respective member of the Government, in the case of the members of ministerial cabinets. It does not exclude or prejudice other forms of accountability, namely criminal, disciplinary or financial, as applicable by law.

¹⁴ The authorities, however, clarify that Article 7 of [Decree-Law no. 32/2024](#), of May 10 2024 is applicable to such a situation. Under this provision, if the Prime Minister is absent or impeded, the minister who is not absent or impeded shall replace him in accordance with the established order of ministers, starting with the Minister of State and Foreign Affairs.

consolidated in a single, easily accessible document. In sum, the first part of this recommendation is to be considered partly implemented.

33. As regards sanctions, GRECO notes that the new Code establishes a liability regime for ministers and members of ministerial cabinets, which may lead to dismissal in cases of serious or repeated violations. It would be useful to indicate, either in the Code or in related practical guidance, what kind of misconduct amounts to a serious breach of the Code, as well as the consequences for less serious breaches. As regards the sanctions provided for in the Political and Senior Public Officeholders Act, GRECO has examined them at the evaluation stage. In general, a scale of proportionate sanctions for different types of violations remains to be defined and this exercise should go hand in hand with the consolidation of all relevant integrity standards. GRECO considers the second part of the recommendation partly implemented.
34. All in all, while the new Government's Code of Conduct contains a number of useful innovations, important work remains to be done and GRECO encourages the authorities to continue the revision of the integrity framework with a global and systemic approach.
35. GRECO concludes that recommendation v has been partly implemented.

Recommendation vi

36. *GRECO recommended that (i) formal training on integrity standards be provided to all persons with top executive functions upon taking office and at regular intervals, and (ii) confidential counselling on ethical issues be made available to them and related statistics on such confidential counselling be duly kept.*
37. The authorities submit that during the two months following the swearing in of the XXIV Constitutional Government, the Transparency Unit of the SGPCM held initial briefings and follow-up meetings with the newly appointed members of the Government (the Government comprises 59 cabinets; a total of 57 meetings were held with different cabinets). The meetings are tailor-made and include a presentation on the legal framework for transparency and the support provided by the Transparency Unit to members of the government and cabinet members. They also include a training component based on the content of the transparency guides. Future training sessions for members of the government and cabinet members will be scheduled in due course, starting in the first half of 2025¹⁵. The plan is to hold four (quarterly) training cycles per year, considering that the target audience could exceed 600 people. In addition, follow-up meetings with members of the government will be held on an annual basis. The Transparency Unit of the newly established GSG will have increased human resources dedicated to this function. The Transparency Unit also provides confidential advice to both members of the Government and cabinet members (in the period April-September 2024, it received around 900 phone calls in this regard). The Transparency Unit is

¹⁵ The Portuguese authorities informed GRECO shortly before its 99th plenary session that the first training session had been held on 12 March 2025 with around 70 participants, including members of the government, chiefs of staff and members of ministerial cabinets. Further training sessions will be held in June, September and December 2025. This development and the further training expected for PTEFs in 2025 will be assessed by GRECO in the next reporting exercise.

working on solutions (including software) regarding the collection of statistical data on such advice¹⁶. Information on all the Unit's activities in these areas will be available in the Annual Report.

38. GRECO takes note of this information and is satisfied that initial briefings and follow-up sessions have been organised for the newly appointed members of the Government. However, it remains unclear whether similar meetings have already been held with the cabinet members. Furthermore, no information has been provided on the attendance rate of different categories of PTEFs to such briefings and training sessions. GRECO looks forward to receiving specific details in this respect to make sure that *all* PTEFs, including cabinet members, do indeed follow inception and refresher integrity training courses. The first part of the recommendation is therefore to be considered partly implemented.
39. As regards the second part of the recommendation, GRECO appreciates that confidential counselling is now open to all PTEFs and is effectively used. GRECO invites the authorities to submit information on further measures to be taken with regard to the keeping of statistics in this respect, pending which this part of the recommendation is regarded as partly implemented.
40. GRECO concludes that recommendation vi has been partly implemented.

Recommendation vii

41. *GRECO recommended improving the public's access to information by taking further measures to limit the use of restrictions under the applicable law governing access to administrative information and documents and make the whole process of access to information more efficient.*
42. The authorities report that the newly established General Secretariat of the Government is responsible for the procedure for access to information of the Council of Ministers and the Government, subject to a final decision by the member of the Government¹⁷. The exercise of these duties should facilitate access to information of the Council of Ministers and the Government. The authorities further report that the Commission for Access to Administrative Documents ([CADA](#)) has prepared and published a study on the implementation and effects of the Law on Access to Information, which contains a number of recommendations. They focus on promoting greater proactive transparency and propose, among other things, the appointment of access to information officers in the institutions concerned; the strengthening of proactive disclosure obligations and CADA's powers to monitor the access regime; the allocation of more human resources to CADA; and the ratification of the Council of Europe Convention on Access to Official Documents. As a follow-up to these recommendations, an information and training campaign is currently underway for Public Administration managers and other public officials on the regime of access to administrative documents. In addition, the

¹⁶ The Portuguese authorities informed GRECO shortly before its 99th plenary session that the new software for registering requests for advice and consolidating statistics had finally been introduced. This development and the experience and statistics gathered with this new tool will be examined by GRECO in the next reporting exercise.

¹⁷ This is stipulated in Article 3(i) of Annex I of [Decree-Law no. 43-B/2024](#), of 2 July 2024.

Community of Anti-Corruption Experts (CEA), created through a collaboration between MENAC and TI Portugal, has started to develop a good practices file on a culture of transparency, which will be made available to all public sector organisations. The authorities also indicate that the new Anti-Corruption Agenda pays attention to the issue of access to information. In particular, it calls for a deepening of the principle of "open government" through the proactive provision of a wider range of documents and administrative data. The Agenda's technical report emphasises the importance of promoting administrative transparency in the public bodies covered by the RGPC and calls for active monitoring of the 3rd National Action Plan for Open Administration (2024-27).

43. GRECO takes note of the above information. The CADA study on the implementation and impact of the Law on Access to Information is undoubtedly an important step in the right direction. GRECO looks forward to receiving an update on the implementation of its recommendations, which appear to be pertinent. GRECO also welcomes the fact that new functions in this area have been assigned to the newly established General Secretariat of the Government. GRECO invites the authorities to assess and report in due course on how this structural measure has improved public access to information in concrete terms and to what extent the use of statutory restrictions on the right of access has been limited as a result of further measures to be taken. GRECO emphasises that the manner in which statutory restrictions are applied should remain in the authorities' focus.
44. GRECO concludes that recommendation vii has been partly implemented.

Recommendation viii
45. *GRECO recommended that the procedure for public consultations in respect of decree-laws be reviewed to ensure that decree-laws be, as a rule, submitted for public consultations, including through the provision of adequate timelines, the documentation of the contributions received and parties involved, as well as the publication of the outcome of public participation procedures in a timely and easily accessible manner.*
46. The authorities indicate that the newly established General Secretariat of the Government is responsible for providing administrative, technological and documentary support for the Government's legislative and regulatory processes, as well as for archiving and preserving the relevant supporting documents¹⁸. In addition, the new Anti-Corruption Agenda includes the objectives of promoting broad civil society participation in public policy-making and strengthening digital means of public consultation in legislative processes. As stated in the Agenda's technical report, it is planned to make maximum use of the Consulta Lex portal for this purpose.
47. GRECO takes note of this submission and finds it encouraging that public consultation on draft legislation remains one of the priorities of the new Anti-Corruption Agenda. However, the authorities do not report any concrete action to revise the current procedure for public consultations on decree-laws and to make such consultations

¹⁸ Article 3(e) of Annex I of [Decree-Law no. 43-B/2024](#), of 2 July 2024.

mandatory or, at least, systematic. GRECO invites the authorities to take decisive action in this respect.

48. GRECO concludes that recommendation viii has not been implemented.

Recommendation ix

49. *GRECO recommended that (i) detailed rules be introduced on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence governmental legislative and other work, and (ii) sufficient information about the purpose of these contacts, 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 be disclosed.*
50. The authorities inform GRECO that they have maintained the "Legislative Footprint" system, which consists of recording in the Legislative Footprint Register all interactions between PTEFs and interested third parties providing technical advice at any stage of the Government's legislative process (see paragraph 71 of the Evaluation Report). As stated in the new Anti-Corruption Agenda, the Government is expected to regulate this system and ensure the accessibility of the information recorded¹⁹. This Agenda also envisages the regulation of lobbying, including a transparency register (a database of interest representatives), a code of conduct for interest representatives and public bodies and a public agenda (a public record of meetings with interest representatives, including the issues discussed and decisions taken)²⁰. The ad hoc committee established to monitor the implementation of this Agenda will organise a conference on this subject during the first semester of 2025. Four bills prepared by different parliamentary groups are currently pending before the legislature²¹. The bills concern the legislative footprint mechanism and the establishment of a transparency register. They have already been subject to consultations with the institutions concerned.
51. GRECO takes note of these submissions and welcomes both the continued operation of the Legislative Footprint Register and the legislative initiatives to regulate lobbying and to increase the transparency of such activities²². GRECO looks forward to receiving in due course the information on the adoption of the relevant legislation and other measures needed for the implementation of this recommendation.
52. GRECO concludes that recommendation ix has been partly implemented.

Recommendation x

¹⁹ Point 2 of the Agenda and Point 5.1 of the Agenda's Technical Report.

²⁰ Point 1 of the Agenda and Point 2.1 of the Agenda's Technical Report.

²¹ [Draft Law no. 179/XVI/1](#) and [Draft Law no. 190/XVI/1](#); Draft Laws no. [346/XVI/1a](#) and no. [366/XVI/1a](#)

²² As measured against OECD standards on lobbying, Portugal does not fulfil any criteria on regulations and practice to mitigate corruption risks related to lobbying. See OECD Anti-Corruption and Integrity Outlook: Country Fact Sheet 2024, page 6.

53. *GRECO recommended that information about the receipt of gifts, offers, hospitality, invitations and other benefits by persons with top executive functions be recorded in a central register and be made available in a timely manner to the public.*
54. The authorities report that measures are being taken to centralise the register of gifts that is maintained by the Transparency Unit of the SGPCM. This register will now include government areas that are not supported by the SGPCM (as follows from Article 9 § 1 of the new Government's Code of Conduct). The Transparency Unit has disseminated this information through its guides and meetings with PTEFs. The newly established General Secretariat of the Government will continue work on the centralisation of this register. The authorities acknowledge that additional measures (including IT solutions) are needed to ensure that the information contained in the register is provided to the public in a timely manner.
55. The authorities also indicate that the requirement to report extends to *any* gift that is likely to compromise impartiality²³. Such gifts, as well as the offer of services or hospitality of such a nature, should be refused (Article 8 § 1 of the new Government's Code of Conduct). The Transparency Unit has particularly insisted on these points during the meetings with members of the Government or when providing confidential advice. It also plans to start publishing a weekly newsletter with practical examples in 2025. Moreover, the rules are interpreted in such a way as to cover gifts received by PTEFs' family members²⁴.
56. GRECO takes note of this information and welcomes the measures taken to centralise the gift register. GRECO invites the authorities to provide in due course an update on the functioning of the central register and the timely publication of the data entered therein.
57. As regards the reporting of gifts, GRECO observes that neither the Code of Conduct of the new Government, nor the Political and Senior Public Officeholders Act (as amended in 2024) contain a clear requirement to report *any* gift that may compromise the recipient's impartiality (regardless of its value). In this context GRECO recalls that it has underlined the importance of such a requirement (paragraph 90 of the Evaluation Report). Indeed, the reporting requirement is no less important where there is a general prohibition on the acceptance of such gifts. Moreover, there is a lack of clarity regarding the value threshold for registration. According to the transparency guides, gifts received by members of the Government and cabinet members must be submitted to the

²³ The [transparency guide](#) states: "The reference value of 150 euros is a presumption and above this value the impartiality of the behaviour or decision of the member of the government is considered to be compromised. This does not mean that the receipt of gifts below this value cannot lead to a compromise of impartiality, nor does it mean that all gifts above this value are necessarily punishable. However, it is a limit that must be respected for the purposes of reporting and registering a gift."

²⁴ The [transparency guide](#) states: "Gifts received in a personal capacity (whether by the office-holder, their spouse or a person with whom they live in conditions similar to those of their spouse, relative or direct family member) and in the context of private relationships are not subject to this regime. However, their acceptance may constitute grounds for excusing or suspecting the member of the Government in proceedings involving the person or organisation responsible for the offer."

Transparency Unit. However, the above-mentioned laws²⁵ only require this for gifts with a value of 150 EUR or more. In general, any legal framework on gifts would benefit from a clear distinction between the acts of accepting, reporting and registering a gift or a related advantage, and from the specification of monetary thresholds for each of these acts. In this connection, and in line with its Evaluation conclusions, GRECO reiterates that a number of member States often use low value thresholds (e.g. 50 EUR), which is a good practice to be followed. Furthermore, there is a lack of clarity regarding gifts received by family members: the transparency guides state that such gifts are not covered by the relevant rules, while the authorities indicate that the rules are interpreted to include them. Finally, GRECO observes that the transparency guides do not provide any practical guidance with real-life examples, which is particularly important in an area such as this. GRECO invites the authorities to clarify all the above matters without delay. While the efforts of the Transparency Unit in this respect are very useful and commendable, the relevant rules should be sufficiently precise and accompanied by thorough and detailed practical guidance.

58. GRECO concludes that recommendation x has been partly implemented.

Recommendation xi

59. *GRECO recommended that (i) similar post-employment restrictions applying to members of the Government be extended to all persons with top executive functions, and (ii) an effective enforcement mechanism be established.*
60. As regards the first part of the recommendation, the authorities state that legislative amendments are still needed to extend the scope of post-employment rules to cabinet members. They do not report any specific measure or initiative in this respect.
61. As regards the second part of the recommendation, the authorities inform GRECO that the Political and Senior Public Officeholders Act was amended in 2024 in order to reinforce the regime to combat the “revolving doors” phenomenon. In particular, and for prevention purposes, Article 10 § 1 of the Act has been amended to specify that the three-year ban on political and public office holders from exercising functions in private companies operating in the sector that was under their direct supervision includes such exercise “*personally or through a company in which they hold a stake*”. A new provision (Article 11 § 4) has been introduced to discourage organisations from employing former political office holders in violation of the applicable restrictions: such organisations will now be “*prevented from benefiting from financial incentives or incentive and tax benefit systems of a contractual nature for a period of three to five years*”. As regards the sanctions for violation of the post-employment restrictions, Article 11 § 3, which provides for disqualification from holding political and high-ranking public office, has been amended to extend the duration of such disqualification from three years to “*a period of three to five years*”.

²⁵ Article 9 § 1 of the Code of Conduct of the XXIV Constitutional Government; Article 16. § 1 of the Political and Senior Public Officeholders Act.

62. GRECO takes note of this information. Regarding the first part of the recommendation, GRECO invites the authorities to take decisive steps to extend the scope of the post-employment regime to all PTEFs, including cabinet members. As regards the second part of the recommendation, GRECO welcomes the value of the recent legislative amendments from a preventive point of view. The sanction of disqualification has also been strengthened.

63. That said, several shortcomings identified in the Fifth Round Evaluation Report (see paragraph 96 of the Fifth Round Evaluation Report on Portugal) are still relevant. In particular, there is still no institutionalised mechanism or other system to monitor the post-employment activities of former PTEFs. No supervisory procedures have been put in place to examine and approve the planned activities of PTEFs after leaving public office. GRECO therefore encourages the authorities to continue their efforts to make their post-employment regime truly effective and comprehensive (encompassing all PTEFs).

64. GRECO concludes that recommendation xi has been partly implemented.

Recommendation xii

65. *GRECO recommended that similar disclosure requirements of income, assets, interests, incompatibilities and disqualifications applying to members of the Government be extended to all persons with top executive functions.*

66. The authorities indicate that Heads of cabinets are already covered by the statutory disclosure requirements²⁶ and that legislative amendments are still needed to extend their scope to all cabinet members.

67. GRECO takes note of this information and looks forward to receiving information in due course on the measures to be taken to implement this recommendation.

68. GRECO concludes that recommendation xii has not been implemented.

Recommendation xiii

69. *GRECO recommended that (i) the electronic platform for filing single electronic declarations be put in place and made operational as soon as possible; (ii) persons with top executive functions' declarations of income, assets, interests, incompatibilities and disqualifications be systematically and easily made accessible online; and (iii) consideration be paid to include additional financial information for spouses, partners and dependent family members (it being understood that such information of close relatives does not necessarily need to be made public).*

70. As regards the first part of the recommendation, the authorities report that the electronic platform²⁷ for the submission of declarations was launched in March 2024

²⁶ Article 3(2)(a) and Article 13(4) of the Political and Senior Public Officeholders Act. See paragraph 97 of the Evaluation Report.

²⁷ <https://entidadetransparencia.pt> (see [Notice no. 4847/2024/2](#), of 6 of March 2024).

and that between March and December 2024, 2,167 declarations were submitted through and registered on the platform. The Entity for Transparency has established the procedures²⁸ for the use of the electronic platform.

71. As regards the second part of the recommendation, the authorities indicate that the electronic platform provides public access to declarations. Such access is governed by Article 17 of the Political and Senior Public Officeholders Act and Articles 14-20 of the Regulation no. 258/2024 of the Entity for Transparency. In accordance with Article 15²⁹ of the Regulation, a number of items are excluded from the scope of public access, including data on income and assets and information on membership, participation or performance of any functions in any organisations of an associative nature. Access to information that is not available to the public is possible through a reasoned request³⁰ addressed to the Entity for Transparency and within the limits set out in Article 20³¹ of the above Regulation.
72. As regards the third part of the recommendation, the authorities argue that the existing legislation already includes financial information for spouses, partners and other family members. They refer to Article 13 § 2(b) of the Political and Senior Public Officeholders

²⁸ [Regulation no. 258/2024, of 6 March 2024.](#)

²⁹ Article 15 on the scope of public access : "1 - The register of interests shall be publicly accessible, except for: a) The breakdown of services provided in the exercise of activities subject to professional secrecy; b) Mention of membership, participation or performance of any functions in any organisations of an associative nature, exercised in the last three years or to be exercised cumulatively with the mandate, or exercised up to three years after leaving office. 2 - The following elements of the declaration are not publicly accessible: a) Sensitive personal data such as address, civil and tax identification numbers, mobile phone and telephone numbers, and email address; b) Data allowing individualised identification of residence, except for the municipality of location; c) Data on income and assets. 3 - Data in respect of which the office holder [including holders of political office, high public office and the like] has had a request for objection granted shall also be exempt from public access."

³⁰ As of 27 December 2024, 298 requests for access have been submitted, of which 269 have been granted, 24 are still under examination and 4 have been rejected.
<https://www.tribunalconstitucional.pt/tc/ept/file/Dados%20estat%EDsticos%2027122024.pdf?src=1&mid=8408&bid=7106>

³¹ Article 20 on the scope of consultation: " 1 - The following elements of the single declaration are not subject to consultation or public access: a) Sensitive personal data such as address, civil and tax identification numbers, mobile phone and telephone numbers, and email address; b) With regard to the register of interests: a breakdown of the services provided in the exercise of activities subject to professional secrecy; c) Data enabling the individualised identification of the post holder's residence, except for the municipality of location, or vehicles and other means of transport. 2 - With regard to data on income and assets, consultation of the single declaration guarantees: a) With regard to gross income for the purposes of assessing personal income tax, only the total amount of each of the declarant's own income categories and the amount of their share of joint income with third parties is made available for consultation, and with regard to income from dependent work the name of the paying entity is also disclosed; b) With regard to real estate assets, the identification of each property, by its matrix, location and asset value, is made available for consultation; c) With regard to quotas, shares, participations or other shares in the capital of civil or commercial companies, only their quantity and the name of the respective company are made available for consultation; d) With regard to rights over boats, aircraft or motor vehicles, the identification of the make, year of registration, model and cylinder capacity of each of these movable assets is made available for consultation; e) With regard to securities portfolios, term bank accounts and equivalent financial investments, as well as current bank accounts and credit rights worth more than 50 minimum wages, only the total value of each of these assets is made available for consultation; f) With regard to liabilities, only the identification of the creditor and the declarant's share of the debt amount shall be made available for consultation. 3 - Data in respect of which the holder has obtained the authorisation of an opposition request is also not available for consultation."

Act, which requires office-holders to declare "the elements of their assets of which they are the owner or co-owner, namely through undivided inheritance, as well as the assets of which they are the owner, holder, manager, lender or lessee, directly *or through a legal or natural person* existing in the country or abroad (...)". In so far as it covers the ownership through any legal or natural person, this provision goes beyond what is required in this part of the recommendation. In addition, the model declaration annexed to the above-mentioned Act contains a section entitled "Other situations", which is intended to cover any situation giving rise to incompatibility or disqualification that is not covered by the previous sections of the model declaration.

73. GRECO takes note of the above information and welcomes the launch of the electronic platform for the submission of declarations. The platform is fully functional and GRECO considers therefore that the first part of the recommendation has been implemented satisfactorily.
74. As regards the second part of the recommendation, GRECO observes that although the declarations submitted are available on the electronic platform, only a very small part of the information contained therein is easily accessible to the public (notably information on professional activities (including remuneration), public, private and social positions, and other functions and activities carried out in the last three years and/or to be carried out in a cumulative manner or up to three years after leaving office)³². Furthermore, several parts of the data relevant to integrity are not accessible even upon request³³. Therefore, despite the availability of declarations on the electronic platform, GRECO cannot conclude that public access to the relevant information has been substantially facilitated³⁴. GRECO reiterates its constant position that in the interests of transparency, all declarations of assets, interests and liabilities should be made public. In sum, the second part of the recommendation has to be considered partly implemented.
75. As regards the third part of the recommendation, GRECO notes that the authorities refer to the Political and Senior Public Officeholders Act and do not report any new measures. However, GRECO has already examined the relevant provisions of this Act during the evaluation stage³⁵. In any event, the disclosure of financial information about spouses, partners and other family members (in particular, income, assets and liabilities held by them) is not equivalent to a declaration of any assets held by an officeholder *through* such persons. Furthermore, the option to include financial information about close relatives in a declaration under "Other situations" is not equivalent to a specific disclosure requirement. GRECO therefore considers this part of the recommendation has not been implemented and expects the authorities to give thorough consideration to this issue, taking into account GRECO's underlying concerns and involving competent authorities and experts. GRECO looks forward to receiving information on the reflection process and the decision taken in due course.

³² See pages 3 and 4 of the declarations available on the electronic platform: <https://entidadetransparencia.pt>

³³ See, in particular, page 3 of the declarations published on the electronic platform.

³⁴ See paragraph 98 of the Evaluation Report : the register of interests of members of the Governments used to be published on the parliament's website.

³⁵ Paragraphs 97-101 of the Evaluation Report.

76. GRECO concludes that recommendation xiii has been partly implemented.

Recommendation xiv

77. *GRECO recommended that, (i) as a matter of priority, the effective functioning of the Entity for Transparency be fully ensured by taking the appropriate regulatory, institutional and operational measures and allocating necessary resources to this body, and (ii) the single declarations of persons with top executive functions be subject to regular substantive checks, by establishing robust and effective cooperation/interaction with all relevant control bodies/databases and imposing proportionate sanctions in case of breach.*
78. As regards the first part of the recommendation, the authorities report that the Entity for Transparency has its own website³⁶, headquarters (in Coimbra) and a staff of 10 persons (including three Board members³⁷, four graduate civil servants - three in law and one in management and auditing, as well as one IT specialist)³⁸. It is envisaged to expand its facilities, which will also allow it to recruit more staff. The Entity maintains the electronic platform for filing declarations, which is fully operational, and has adopted an important regulation governing the procedures for processing and accessing declarations on the platform (see paragraph 69 above). The Technical Report on the new Anti-Corruption Agenda (point 6.2) foresees an evaluation of the functioning of the Entity with a view to identifying possible needs for strengthening or clarifying the relevant legal framework. However, such an evaluation will have to be carried out at a later stage, as the Entity has only recently become operational (mid-2023).
79. As regards the second part of the recommendation, the authorities submit that the Entity for Transparency performs the verification of the declarations filed through the electronic platform in two steps: initial check and monitoring (review). The first step consists of confirming if the officeholder has submitted the declaration. If not, the Entity for Transparency notifies the officeholder and, in case non-compliance persists, reports it to the competent authority/Public Prosecution Service at the Constitutional Court (Article 18 of Law no. 52/2019; Article 8 (1) (g) of Entity for Transparency Statute)³⁹. If submitted, then the conformity and consistency of the declaration is analysed. If doubts arise or clarification is needed, the Entity requests the officeholder to provide additional information and/or explanations⁴⁰. The second step of verification (review/monitoring) is carried out when specific criteria are met. By 11 December 2024, the Entity for Transparency had completed the verification of 552 out of 2,054 declarations submitted. The authorities also point out that the Technical Report to the new Anti-Corruption Agenda (point 6.2) identified the following measures needed to improve the Entity's monitoring capacity: evaluation of the functioning of the electronic platform;

³⁶ [Entidade para a Transparência](#).

³⁷ They took office in February 2023 – see paragraph 104 of the Evaluation Report.

³⁸ Recruitment is underway for 3 more graduate civil servants: 2 in law - and 1 in management and audit.

³⁹ By 11 December 2024, the Entity for Transparency issued 158 notifications to officeholders that had not submitted declarations as required by law and it sent two reports to the Public Prosecutor's Office at the Constitutional Court that despite actions carried out by the Entity, the officeholders concerned did not comply.

⁴⁰ As a result, by 11 December 2024, 285 declarations had been replaced and 73 cancelled.

strengthening of the mechanisms of interaction with the users of the platform; creation of interoperability mechanisms (in particular, interconnection with the Tax Agency and the Registries); coordination with the Public Prosecutor's Office and other control and investigation bodies.

80. GRECO takes note of the above information. As regards the first part of the recommendation, GRECO welcomes the fact that the Entity for Transparency has been provided with resources to enable it to start its main functions - the operation of the electronic platform for the submission of declarations, the verification of the declarations submitted and the examination of requests for access. It is also positive that the effectiveness of this body is a priority under the new Anti-Corruption Agenda. GRECO notes that, in terms of human resources, more specialised staff (legal, audit, IT) would be welcome, in addition to the five persons already employed. GRECO trusts that the forthcoming evaluation of the Entity's activities will make it possible to identify precisely its various needs in terms of resources and regulatory measures. In view of the authorities' commitment to strengthen the functioning of the Entity, GRECO considers that the first part of this recommendation has been implemented satisfactorily.
81. As regards the second part of the recommendation, GRECO is pleased to note that the process of verification of declarations has been launched. Its initial results allow it to be described as thorough and focused on discrepancies and gaps in the information provided. GRECO invites the authorities to submit details on the operation of the sanctioning mechanism, which will need to be assessed in due course. As also stressed in the new Anti-Corruption Agenda, further action is needed to enhance the interoperability of the e-platform and the cooperation between the Entity for Transparency and other control and investigation authorities⁴¹. This part of the recommendation is therefore considered partly implemented.
82. GRECO concludes that recommendation xiv has been partly implemented.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xv

83. *GRECO recommended that further measures be taken to strengthen the representation of women at all levels in the Public Security Police and the National Republican Guard*
84. The authorities report that the number of women in both the PSP and the GNR is, as a whole, increasing. In 2024, there were 2,036 military women in the GNR, representing 8.90% of the total contingent. The total number of female GNR officers in command positions was 43, representing 5.66% of all command positions in the GNR. In January 2025, the PSP had a total of 1,799 female police officers, representing 9% of the total

⁴¹ See also in this respect [EC Rule of Law Report \(2024\)](#), p. 21-22 : "However, some concerns related to the functioning of the Entity have been raised, in particular in relation to the geographical distance from the Constitutional Court, the current lack of the interoperability of the platform, in particular with the Bank of Portugal and the potentially burdensome manual checks of the information inserted in the platform."

contingent. The total number of female police officers in command positions was 73⁴². The authorities also indicate that the GNR has a functioning Gender Equality Commission and provides equal working conditions for men and women in terms of barracks, toilets and changing rooms. Both the GNR and the PSP conduct targeted awareness campaigns on the internet and social media, as well as in high schools, to encourage female candidates to participate in recruitment competitions. The GNR has also launched a marketing plan to increase the online visibility of female professionals, particularly on social media. The authorities also recall that the physical entry tests are based on different requirements for male and female candidates (as already noted in paragraph 123 of the Evaluation Report).

85. GRECO takes note of the above submissions. Comparing the 2024 figures with those analysed during the evaluation phase, GRECO notes a slight increase in the proportion of women among GNR staff and a slight decrease among PSP staff. GRECO considers that awareness-raising and visibility campaigns are useful steps, but that more determined and targeted measures are needed to bring about a substantial change in the figures, such as a deliberate recruitment policy giving priority to qualified female candidates, including at the most senior levels. GRECO also underlines the importance of harassment prevention, training, counselling and other measures to promote inclusiveness, as well as effective sanctioning of non-compliance with gender equality legislation. As important work remains to be done, GRECO invites the authorities to continue their work on establishing policies promoting work-life balance and gender equality on a more structural level, and to draw on the best practices of member States that have achieved a significant change in the gender structure of police forces.
86. GRECO concludes that recommendation xv has been partly implemented.

Recommendation xvi

87. *GRECO recommended that the framework on access to policing information be reviewed to make the information more readily available while preserving the confidentiality of ongoing investigations by the Republican National Guard and the Public Security Police.*
88. The authorities argue that the GNR and the PSP take various measures to improve communication and provide timely information. Both forces prepare on a daily basis press releases concerning daily, weekly and thematic operational activities or specific situations. They are published on the websites of the GNR⁴³ and the PSP⁴⁴ and further disseminated through social networks (X, Facebook, Instagram and LinkedIn). The GNR also prepares videos, mainly on national police operations and those with significant

⁴² In January 2022, the percentage of female staff was 10.25% in the PSP and 7.74% in the GNR (see paragraph 123 of the Evaluation Report). The Portuguese authorities also informed GRECO shortly before its 99th plenary meeting that since October 2024 a woman (Colonel) has been attending the promotion course to become a General; at the beginning of 2025 a woman (Colonel) was appointed Commander of the Territorial Command of the Azores; and the first woman was also promoted to the rank of Sergeant Major. These developments will be examined by GRECO in the next reporting exercise.

⁴³ The GNR published 2,816 press releases in 2022, 2,647 - in 2023, and 1,519 in January-August 2024. See [GNR](#).

⁴⁴ The PSP published 3,412 press releases in 2022, 3,383 - in 2023, and 4,010 in 2024. 21 press releases were published in January 2025. See [Polícia de Segurança Pública](#).

media impact (44 videos posted in 2023). The PSP promotes awareness, prevention and security campaigns on social networks. Both forces also try to answer requests for information as quickly as possible⁴⁵. In the GNR, communication with the media is centralised and coordinated by the Communication and Public Relations Department (DCRP) to ensure timely responses and avoid the release of incorrect information. In the PSP, communication has been centralised through the National Directorate, which allows for faster processing of requests, and training in institutional communication has been increased for police officers.

89. GRECO takes note of the above submissions and acknowledges the continued efforts of the GNR and the PSP to provide accurate and timely information to the public and to streamline internal procedures to this end. At the same time, it remains unclear whether and to what extent the legal deadlines for processing information requests are respected. GRECO has previously pointed to a more general problem of apparent mistrust between law enforcement authorities and the media and recommended that the authorities reflect on how to improve the framework for access to police information (see paragraph 127 of the Evaluation Report). GRECO has now been informed that CADA has carried out a study on the implementation and impact of the Law on Access to Information (see paragraphs 42-43 above). GRECO invites the authorities to provide an update in due course on the follow-up given to this study by the GNR and the PSP in the context of their respective communication policies and activities.
90. GRECO concludes that recommendation xvi has been partly implemented.

Recommendation xvii
91. *GRECO recommended that a longer-term perspective on institutional measures be provided in the form of dedicated anti-corruption strategies within the Public Security Police and the National Republican Guard, as a complement to the Plans for the Prevention of Risks of Corruption and Related Offences.*
92. The authorities report that the GNR is currently developing its general Strategy for 2026-2030, which will include the corruption prevention strategy. As regards the PSP, it has recently adopted a new Code of Conduct and included content on anti-corruption strategies in its training programme. The PSP is now working on the development of its anti-corruption strategy for 2024-2028. Both the GNR and the PSP regularly update their risk assessment maps and prepare interim and annual evaluation reports on the measures implemented, as required by the RGPC (Article 6).
93. GRECO takes note of this information. It follows that neither the GNR, nor the PSP have to date developed dedicated anti-corruption strategies, nor have they provided a draft strategy document with a long-term vision of the required anti-corruption measures.
94. GRECO concludes that recommendation xvii has not been implemented.

⁴⁵ The GNR answered 1,077 inquiries from media outlets in 2022, 1,024 – in 2023 and 770 in January-August 2024. The PSP provided 169 responses to the media in 2022, 205 in 2023, 621 in 2024 and 121 in January 2025.

Recommendation xviii

95. *GRECO recommended that (i) the Code of Ethics for the Police Service be updated or similar documents be adopted to address current challenges relating to corruption prevention and integrity matters (e.g. conflicts of interest, gifts, confidential information, use of public resources, accessory activities etc.), and (ii) that such documents be complemented with practical guidance and concrete examples.*
96. The authorities report that the GNR has a Code of Conduct developed on the basis of UN standards and is currently finalising a new Code of Conduct, which will soon be submitted to the Commander-in-Chief for approval. The PSP adopted a new Code of Conduct in January 2024. It contains provisions on conflicts of interest, gifts, professional secrecy, the exercise of functions on the basis of exclusivity, the prohibition of the misuse of public resources and a sanctioning regime. The necessary practical guidance for this Code has not yet been developed.
97. GRECO takes note of this information. As regards the first part of the recommendation, GRECO looks forward to receiving in due course the new Code of Conduct of the GNR and welcomes the adoption of the new Code of Conduct of the PSP, which includes the integrity issues referred to in this recommendation. In particular, the provisions on conflicts of interest (Articles 12-13) include a definition and a requirement to avoid, resolve or eliminate such conflicts. The provision on gifts (Article 17) is more detailed, but lacks a value threshold for accepting a gift and a clarification of what constitutes a gift of "symbolic or religious significance". In this respect, GRECO recalls that it recommended "a clear indication of which gifts or hospitality may or may not be accepted, depending on the context, the giver, the value or the occasion" (paragraph 184 of the Evaluation Report). The provision on the accumulation of functions (outside activities) only requires that approval be sought for such activities and does not contain any detailed rules. However, the authorities indicate that the PSP is working on new rules in this area (see paragraph 112 below). In conclusion, the new Code of Conduct of the PSP is a step forward, but it is still rather general and needs more detail and clarification, which makes the practical guidance all the more important. GRECO considers that the first part of the recommendation has been implemented as regards the PSP and partly as regards the GNR.
98. The second part of the recommendation has not been implemented, as the practical guidance for the codes of conduct of the GNR and the PSP is missing.
99. GRECO concludes that recommendation xviii has been partly implemented.

Recommendation xix

100. *GRECO recommended that a mechanism be introduced for providing confidential counselling on ethical and integrity matters for staff of the Public Security Police and of the National Republican Guard.*
101. The authorities report that confidential counselling is provided in the GNR by its General Inspection, which is also responsible for examining complaints against GNR staff. As

regards the PSP, work is underway to establish a counselling channel under the auspices of its Inspection Service. The latter does not have any role in disciplinary matters, except for proposing disciplinary action to be taken. It does not examine complaints against the PSP staff.

102. GRECO takes note of this submission and reiterates its consistent position that it is not appropriate to attribute counselling function to a body responsible for enforcing the rules of conduct or receiving complaints, as this may have a chilling effect. Given that the General Inspection of the GNR deals with complaints against GNR staff, the latter are likely to avoid seeking advice from this body when faced with an ethical dilemma, for fear of subsequent action against them. Such an arrangement is therefore not in line with GRECO's standards and the present recommendation. GRECO underlines that the element of trust is crucial for an advisory mechanism. Indeed, advice on integrity matters should be provided by persons who do not have day-to-day contact with the addressees and who have been adequately trained for this purpose. For the same reasons, GRECO has concerns about the creation of the counselling mechanism on the basis of the Inspection Service of the PSP. While it does not examine complaints against the PSP staff, it may still propose disciplinary action, which, in GRECO's view, is sufficient to have a chilling effect. GRECO therefore invites the authorities to provide information on the measures taken to reform and develop such a mechanism within the GNR and the PSP, taking these considerations into account.

103. GRECO concludes that recommendation xix has not been implemented.

Recommendation xx

104. *GRECO recommended strengthening the current vetting processes in the Public Security Police and the National Republican Guard and introducing vetting at regular intervals during their staff members' careers.*
105. The authorities report that in the GNR, the General Inspection and the Department of Justice and Discipline have introduced a requirement for GNR staff to notify any criminal or disciplinary proceedings initiated against them. A further requirement to provide financial details is under consideration. The General Inspection also exercises oversight through the examination of complaints against GNR staff and through scheduled and unscheduled visits. In addition, other units within the GNR exercise internal control in the operational, administrative, financial and technical fields. As far as the PSP is concerned, its Inspectorate, which reports directly to the Director of the PSP, exercises internal control, in particular by means of ordinary or extraordinary inspections. In addition, PSP staff are required to report any known or imminent breach of the Code of Conduct to their superiors. It is also planned to increase training for the command level and thematic inspections.
106. GRECO takes note of this submission and emphasises that the vetting process required by this recommendation and in line with GRECO's constant position should go beyond standard internal control or appraisal procedures and cover a variety of aspects in addition to criminal or disciplinary records (in particular family, associates, financial and driving records, outside activities, previous jobs, etc.). While the mandatory notification

and reporting of misconduct are useful tools, the vetting process should make it possible to independently identify any relevant circumstances that may compromise the integrity of the person concerned or to cross-check the information provided by that person (including through inter-institutional cooperation). For these reasons, GRECO has always underlined that vetting should be carried out by dedicated and trained staff outside the direct chain of command. Moreover, given the need to follow up any changes in the personal circumstances of police officers, GRECO has advocated the introduction of regular vetting, the frequency of which should depend on the risk exposure and the level of security required. In substance, the measures reported by the authorities do not comply with GRECO's standards for the vetting procedures. GRECO therefore urges the authorities to take decisive action in designing a system of periodic background checks outside the appraisal and internal control context.

107. GRECO concludes that recommendation xx has not been implemented.

Recommendation xxi

108. *GRECO recommended that the Public Security Police and the National Republican Guard review their current appointment and promotion processes in respect of managerial positions, with a view to improving the objectivity and transparency of such processes and decisions.*

109. The authorities claim that the promotion procedures in the PSP and the GNR, as provided for in the current regulatory framework (which pre-dates the evaluation process), ensure compliance with the guarantees of equal treatment, transparency and impartiality, taking into account the needs of the service, the professional and personal qualifications of the candidates and the requirements of the post or functions to be performed. In particular, the PSP uses the curricular evaluation method for the promotion of police officers (in accordance with the [ordinance no. 330-A/2016](#)). The GNR intends to introduce process certification to improve objectivity and transparency, which can be audited by the Guard Inspectorate.

110. GRECO takes note of the above argument and observes that the authorities do not report any new measure of a regulatory or procedural nature to review the current appointment and promotion procedures for senior positions in order to address the concerns expressed by GRECO during the evaluation phase, in particular the significant degree of discretion (paragraph 162 of the evaluation report).

111. GRECO concludes that recommendation xxi has not been implemented.

Recommendation xxii

112. *GRECO recommended that the Public Security Police establish clear rules on outside activities and that such activities be duly recorded and subject to regular checks thereafter.*

113. The authorities submit that in addition to its Statute, the PSP has rules on teaching activities for all its staff and rules on outside activities for pre-retirement staff (these

rules predate the Evaluation Report). The authorities further indicate that in accordance with the Statute and the new Code of Conduct of the PSP, any outside activity requires the approval of the Director of the PSP. Before being submitted to the Director, requests for authorisation, accompanied by information from the applicants' line managers, are first examined by the Legal Advice Unit of the Human Resources Department in order to identify any circumstances that might compromise impartiality and transparency or give rise to incompatibilities and/or conflicts of interest. All approved activities are recorded and subject to sporadic controls. The Human Resources Department has been working on new internal regulations in this area since April 2024, in order to take into account the recommendations on the management of conflicts of interest in the public sector and the recent Ordinance n.º 185/2024/1 of 14 August 2024 approving the model for the declaration of absence of any conflict of interest. One of the proposals under consideration is to limit the duration of the authorisation to 12 months in order to allow for more regular monitoring of outside activities.

114. GRECO takes note of this information and is pleased that the PSP has clarified the procedure for the examination of the authorisation requests and started the process of updating its regulations on outside activities. GRECO looks forward to receiving an update on this process and the adopted documents in due course.

115. GRECO concludes that recommendation xxii has been partly implemented.

Recommendation xxiii

116. *GRECO recommended that the system of donations and sponsorships to the Public Security Police and the National Republican Guard be reviewed in order to (i) putting in place safeguards against real, potential or perceived conflicts of interest; and (ii) publishing donations and sponsorships online on a regular basis, indicating the value, donor's identity and how the assets donated were spent or used.*
117. The authorities inform GRECO that the GNR is currently reviewing the process of receipt of donations with a view to updating its internal regulations. The update will normally include a requirement to publish information on such receipt on the GNR's official website. With regard to the PSP, its new Code of Conduct includes provisions on conflicts of interest (in particular, a definition of a conflict of interest and a requirement to avoid, resolve or eliminate such a conflict) and the receipt of gifts and donations. In particular, the Code requires that such donations be registered, regardless of their value and the final intended use of the donation. For this purpose, they must be reported to the Organic Logistics and Finance Unit. By 15 January each year, the above Unit notifies the PSP National Inspection of all the goods registered in the previous year and the destination of these goods. Gifts and donations of monetary value are prohibited. The PSP is also considering the introduction of a transparency mechanism for donations.
118. GRECO takes note of this information. As regards the first part of the recommendation, GRECO notes that the GNR is at the very beginning of the process of taking the necessary measures. In particular, GRECO has not received any draft documents or details on the review process. As regards the PSP, GRECO notes that the new Code of Conduct provides for mandatory internal registration of all donations, which is a positive step. However,

the system of donations and sponsorship as a whole has not been reviewed in order to embed safeguards against conflicts of interest in this area and to address GRECO's concerns expressed in paragraph 186 of the Evaluation Report⁴⁶. It is clear that such a review implies regulatory measures beyond the scope of a Code of Conduct, as well as measures of a procedural nature. In conclusion, the first part of the recommendation has not been implemented. As regards the second part of the recommendation, neither the GNR nor the PSP have started to publish information on donations and sponsorship on their respective institutional websites. This part of the recommendation has also not been implemented.

119. GRECO concludes that recommendation xxiii has not been implemented.

Recommendation xxiv

120. *GRECO recommended that a study be conducted concerning the activities of Public Security Police and National Republican Guard staff after they leave the force and that, if necessary, in the light of the findings of this study, rules be established to ensure transparency and mitigate the risks of potential conflicts of interest in this respect.*
121. The authorities indicate that neither the PSP, nor the GNR have started to carry out the recommended study, although it is included in their respective institutional plans. The PSP, in particular, intends to include this study in the wider quality management process covering various aspects of the situation of police officers after leaving the service.
122. GRECO takes note of this statement and invites the authorities to submit, in due course, information on the study to be conducted and the follow up to be given to it.
123. GRECO concludes that recommendation xxiv has not been implemented.

Recommendation xxv

124. *GRECO recommended that the staffing level of the Inspectorate General for Home Affairs be further increased.*
125. The authorities report that as of January 2025, 38 posts (including 11 inspectors, of which seven are women and four are men) have been filled in the Inspectorate General for Home Affairs (IGAI) out of a planned total of 55. The staffing of the IGAI has therefore deteriorated compared to January 2024 (42 posts filled) and the time of adoption of the Evaluation Report (39 posts filled in March 2023). The authorities point to long-standing difficulties in increasing the staffing of the IGAI, not least due to the recruitment processes, which may require, depending on the previous professional role of the personnel to be recruited, the authorisation of members of the Government, the High

⁴⁶ GRECO "takes the view that all police forces should preferably be financed solely on the basis of democratically decided and transparent public budgets. It is concerned that donations and sponsorships may taint the reputation of the police or compromise the perception of its neutrality. Full transparency must always be required in respect of all funding to public bodies, such as the law enforcement services".

Council of the Judiciary, the High Council for Administrative and Tax Courts or the High Council of the Public Prosecution Service. However, the authorities are committed to resolving this situation.

126. GRECO takes note of this information and encourages the authorities to take all necessary regulatory and procedural measures to prioritise the effective increase in the staffing of the IGAI.
127. GRECO concludes that recommendation xxv has not been implemented.

Recommendation xxvi

128. *Greco recommended that complaints against staff members of the Public Security Police and the National Republican Guard and measures taken in this respect be reflected in centralised statistics available to the public, while respecting the anonymity of the persons concerned.*
129. The authorities recall that the IGAI publishes on its website decisions in disciplinary cases, summaries and statistics (paragraph 212 of the Evaluation Report). As regards the GNR, the authorities indicate that statistical data on complaints received and proceedings initiated as a result are published in its annual Activity Report⁴⁷. The PSP includes annual statistics on disciplinary cases and their outcome in the annual social balance sheet⁴⁸ published on its website.
130. GRECO takes note of this information. As regards the GNR, GRECO considers it good practice to publish statistical information on complaints in annual reports. However, GRECO notes that the GNR has not yet published such reports for 2023-2024. The authorities may therefore consider publishing this information on a dedicated webpage in addition to the annual reports. As regards the PSP, the information provided in the annual social balance sheet focuses only on disciplinary cases. In GRECO's view, it could usefully cover the number and typology of complaints received and the follow-up to such complaints other than disciplinary proceedings.
131. GRECO concludes that recommendation xxvi has been partly implemented.

Recommendation xxvii

132. *Greco recommended (i) strengthening the protection of whistleblowers within the Public Security Police and the National Republican Guard, particularly by establishing internal reporting channels; and (ii) conducting dedicated training and awareness-raising activities about whistleblower protection measures for all levels of hierarchy and chains of command.*

⁴⁷ As an example, the authorities submit the [2022 Activity Report](#) (see Section 1.3 – pp. 185-188). Activity Reports for 2023 and 2024 are not yet available on the [GNR website](#).

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<https://www.psp.pt/Documents/Instrumentos%20de%20Gest%C3%A3o/Balan%C3%A7o%20Social/Balan%C3%A7o%20Social%20da%20PSP%202023.pdf>.

133. The authorities submit that the GNR now has both the internal reporting channel (on the Intranet) and the external one (on its [website](#)). GNR's internal channel has been operational since 1 January 2024 and no reports have been submitted. At the end of 2024, the PSP also developed a reporting channel on its [website](#), which provides the possibility to submit anonymous reports. This channel is intended to be both internal and external. It is in the final stages of implementation, with some delays due to technical issues. A dedicated structural unit within the PSP will deal with the reports submitted ensuring the protection of whistleblowers in accordance with the applicable legislation. Regarding the second part of the recommendation, the awareness-raising activities have not yet been carried out in either the GNR or the PSP, but both forces are working on their respective training plans to include the whistleblowing component. The PSP intends to provide the requisite training as soon as the reporting channel is fully operational.
134. GRECO takes note of this information and is pleased to note that the GNR's internal reporting channel is already operational and that the PSP's channel will be launched very soon. GRECO looks forward to receiving in due course details on the functioning of these channels and an update on the dedicated training to be provided to all levels of hierarchy within both forces.
135. GRECO concludes that recommendation xxvii has been partly implemented.

Recommendation xxviii

136. *Greco recommended reviewing the disciplinary regime of the Public Security Police and the National Republican Guard with a view to excluding any possibility of a hierarchical superior deciding on disciplinary matters single-handedly.*
137. The authorities provide explanations on the disciplinary proceedings (described and analysed in paragraphs 211 and 213 of the Evaluation Report). With regard to the GNR, the authorities argue that the initiation of the proceedings, the investigation of the alleged misconduct and the imposition of a sanction are carried out by different persons. In particular, the investigation is carried out by an appointed instructor who acts independently and ensures the confidentiality of the proceedings. The Justice and Discipline Department of the GNR verifies that procedural guarantees and the rights of the defence have been respected and provides a legal analysis of the case before submitting a proposal for a decision to the Commander General for approval. The final decision may be appealed to the Minister of Home Affairs. With regard to the PSP, the investigation of the alleged misconduct and the imposition of a sanction are also carried out by different persons. In particular, the investigation is carried out by an appointed instructor and a secretary, both of whom act independently and ensure the confidentiality of the proceedings. Their findings are submitted to the Commander of the Police District Command and then to the national Police level. The authorities also argue that disciplinary proceedings respect the rights of the defence and are not exclusively in the hands of the officer's superior. The accused officer can appoint a lawyer at any stage. The disciplinary decision can be appealed both administratively and in court.

138. GRECO takes note of this information and observes that the authorities do not report any new measure or provide any new information. They essentially contest GRECO's assessment of the disciplinary regime in the evaluation report and the present recommendation. GRECO recalls that it was "seriously concerned about the fact that disciplinary proceedings are almost entirely in the hands of the officer's hierarchical superiors, who are responsible for initiating proceedings, assessing the results of the investigation and deciding on a sanction, with a collegial board giving an opinion only on the application of the gravest sanctions. This lack of separation between the authority to initiate proceedings and the authority to decide on sanctions may be conducive to a lack of impartiality and fairness in the proceedings. A process in which the case would be heard and decided by a collegial authority could offer better guarantees." (paragraph 213 of the Evaluation Report). GRECO observes that the disciplinary regime of the GNR and the PSP is governed by their respective disciplinary statutes, which contain provisions conferring significant powers on superiors in disciplinary matters. These provisions have not been repealed or amended.
139. GRECO concludes that recommendation xxviii has not been implemented.

III. CONCLUSIONS

140. In the light of the foregoing, GRECO concludes that Portugal has satisfactorily implemented none of the 28 recommendations set out in the Fifth Round Evaluation Report. Eighteen recommendations have been partly implemented and ten have not been implemented.
141. More specifically, recommendations i-vii, ix-xi, xiii-xvi, xviii, xxii, xxvi-xxvii have been partly implemented and recommendations viii, xii, xvii, xix-xxi, xxiii-xxv, xxviii have not been implemented.
142. With regard to top executive functions, some progress has been made in a number of key areas. An important achievement is that MENAC and the Entity for Transparency have become operational. The Code of Conduct of the new Government has been adopted, introducing a number of useful innovations, but important work remains to consolidate all integrity standards and provide the necessary practical guidance. Introductory briefings and training sessions have been organised for members of the new government and confidential counselling is now available to all PTEFs, which is an important milestone. The launch of the electronic platform for the submission of declarations is another important development to be welcomed.
143. At the same time, more determined action is needed to ensure that integrity controls are effectively applied to all PTEFs. The new National Anti-Corruption Strategy and related Action Plan for the period 2025-2028, as well as a corruption risk prevention plan specific to PTEFs, have yet to be adopted. Additional efforts are needed to make the whole process of access to information more efficient, to revise the current procedure for public consultations on decree-laws and to regulate lobbying and increase its transparency. The authorities are also expected to further clarify the rules on gifts and to ensure the timely publication of information entered in the central register of gifts.

Asset disclosure and post-employment requirements should be extended to cabinet members. All declarations of assets, interests and liabilities of PTEFs should be made effectively accessible to the public.

144. With regard to the law enforcement agencies, GRECO notes the adoption of the new Code of Conduct of the PSP and the ongoing work to finalise the new Code of Conduct of the GNR. The Codes of Conduct of both forces need to be complemented by the necessary practical guidance. It is a positive achievement that both the GNR and the PSP now have internal whistleblowing reporting channels, the functioning of which should now be promoted through specific awareness-raising activities. However, further efforts are needed to improve gender balance, establish a confidential counselling mechanism and a system of regular vetting, review the disciplinary regime, revise the current appointment and promotion procedures for senior positions, and implement conflict of interest safeguards as well as transparency in donations and sponsorship. Dedicated anti-corruption strategies have yet to be developed by the PSP and the GNR. The staffing of the Inspectorate General for Internal Affairs (IGAI) needs to be increased as a matter of priority.
145. In the light of the foregoing, GRECO notes that further progress will need to be made within the next 18 months to achieve an adequate level of compliance with the recommendations. In accordance with Rule 31 revised bis, paragraph 8.2, of its Rules of Procedure, GRECO calls on the head of the delegation of Portugal to submit additional information with regard to the implementation of all the recommendations by 30 September 2026.
146. GRECO invites the authorities of Portugal to authorise the publication of this report at their earliest convenience and to make a translation of it into the national language available to the public.