

COUNCIL**Council****REPORT ON THE IMPLEMENTATION OF THE OECD
RECOMMENDATION ON PUBLIC INTEGRITY AND THE OECD
RECOMMENDATION ON OECD GUIDELINES FOR MANAGING
CONFLICT OF INTEREST IN THE PUBLIC SERVICE****(Note by the Secretary-General)**

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1. This document presents, in its Annex, the Report to the Council on the implementation of the OECD Recommendation on Public Integrity [[OECD/LEGAL/0435](#)] (hereafter, “2017 Recommendation”) and the OECD Recommendation on OECD Guidelines for Managing Conflict of Interest in the Public Service [[OECD/LEGAL/0316](#)] (hereafter, “2003 Recommendation”), (collectively referred to as the “Recommendations”), by OECD Members and non-Members having adhered to them (hereafter, “Adherents”). The Report also includes conclusions on whether the Recommendation requires revision and whether further actions to support its dissemination and implementation are necessary.

2. On 26 March 2026, the Public Governance Committee (PGC) approved, by written procedure, the Report set out the Annex and its transmission to the Council to be noted and declassified [[GOV/PGC/INT\(2025\)11/REV3](#)]. Following approval, adjustments were made to the Report, at the request of one Adherent, to the description of their domestic situation. The PGC was informed of these adjustments [[GOV/PGC/INT\(2025\)11/FINAL](#)]. Once declassified by the Council, the Report will be included on the [online Compendium of OECD Legal Instruments](#).

Background

3. The 2017 Recommendation, adopted by the Council on 26 January 2017 [[C\(2017\)5](#) and [C/M\(2017\)2](#), Item 6], on the proposal of the PGC, updated and replaced the OECD Recommendation on Improving Ethical Conduct in the Public Service including Principles for Managing Ethics in the Public Service [[OECD/LEGAL/0298](#)] (hereafter, the “1998 Recommendation”). The 2017 Recommendation is based on the premise that integrity, one of the pillars of political, economic and social structures, is essential to a strategic and sustainable response to corruption, and to the economic and social well-being of individuals and societies. The 2017 Recommendation was developed to provide Members and non-Members having adhered to it (hereafter, the “Adherents”)¹ with the blueprint for a public integrity system. It shifts the focus from *ad hoc* integrity policies to a comprehensive, risk-based approach with an emphasis on cultivating a culture of integrity across the whole of society. The 2003 Recommendation was adopted by the Council on 28 May 2003 [[C\(2003\)107](#) and [C/M\(2003\)12/PROV](#), Item 196] on the proposal of the PGC. It responded to a growing demand to ensure integrity and transparency in the public sector, as increasingly close relationships between business and the public sector gave rise to the potential for new forms of conflict between individual private interests and public duties. It was developed to provide a framework to Adherents² in reviewing and modernising their conflict-of-interest rules, policies and practices.

4. In recent years, several developments have shaped and impacted the implementation of both Recommendations by Adherents. Persisting low levels of trust in public institutions, high-profile corruption cases, or emerging global challenges, such as Artificial Intelligence (AI) and foreign interference, have driven countries’ efforts in strengthening their anti-corruption and integrity frameworks to combat corruption and its adverse impact on prosperity and democracy (OECD, 2024^[1]). In addition, several OECD

¹ At present, all OECD Members and four non-Members, Argentina, Kazakhstan, Morocco and Peru, are Adherents to the Recommendation.

² At present, all OECD Members and one non-Member, Peru, are Adherents to the Recommendation. References to Adherents throughout the Report refer to the OECD Members and non-Members having adhered to the 2017 and 2003 Recommendations, unless when referring specifically to one Recommendation.

legal instruments have been revised in recent years that have had an impact on the implementation of the 2003 and 2017 Recommendations by Adherents, including the OECD Recommendation on Transparency and Integrity in Lobbying and Influence [[OECD/LEGAL/0379](#)] revised in 2024 to reflect the evolving lobbying and influence landscape; and the OECD Recommendation for Further Combating Bribery of Foreign Public Officials in International Business Transactions [[OECD/LEGAL/0378](#)] updated in 2021 to further support the implementation of the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions [[OECD/LEGAL/0293](#)] (hereinafter, the “Anti-Bribery Convention”). The OECD Recommendation on Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises (SOEs) [[OECD/LEGAL/0451](#)] was adopted by the Council in 2019.

5. Beyond the OECD, several international standards and initiatives have also shaped the implementation of the 2003 and 2017 Recommendations, including efforts under the United Nations Convention Against Corruption, the European Commission’s initiative to update the legislative framework on anti-corruption across the European Union (EU), and the actions promoted by the G20, through its Anti-Corruption Working Group.

Methodology

6. The methodological approach for the development of this Report was discussed by the Working Party on Public Integrity and Anti-Corruption (PIAC) at its meeting in November 2024 [[GOV/PGC/INT/M\(2024\)2](#)]. As agreed by PIAC, and to avoid overburdening national administrations with data collection exercises, the primary source of information for this Report is the data collected through the OECD Public Integrity Indicators (hereinafter, “PIIs”) across four datasets: 1) quality of anti-corruption and integrity strategic framework; 2) effectiveness of internal control and risk management; 3) integrity of the justice and disciplinary systems; and 4) accountability of public policymaking. Whenever reference is made to ‘PII Respondents’ and unless indicated otherwise, this refers to Adherents that have validated the assessment for the respective PII dataset.

7. In addition to the data from the PIIs, the OECD Secretariat collected country examples and experiences in a consultation on the implementation of pillar II (culture) on 27 March 2025, to which all Adherents were invited. Additionally, the Report builds on the findings presented in the 2024 and the 2026 OECD Anti-Corruption and Integrity Outlook, OECD Integrity Reviews and other country-specific analyses, as well as complementary OECD data and reports.

Process

8. The process for developing this Report began with an initial discussion of the proposed methodology at the meeting of the PIAC in November 2024 [[GOV/PGC/INT/M\(2024\)2](#)], followed by a consultation on the implementation of pillar II (culture) of the 2017 Recommendation in March 2025, to which all Adherents were invited. The PIAC Chair presented progress on the preparation of the draft Report to the PGC at its meeting on 21-22 October 2025 [[GOV/PGC/A\(2025\)6/REV2](#)]. A first draft of the Report [[GOV/PGC/INT\(2025\)11](#)], excluding insights from the then forthcoming PII dataset on principle 11 (Integrity of the justice and disciplinary systems) as well as information on dissemination, continued relevance and next steps, was discussed by the PIAC at its

meeting on 13-14 November 2025 [[GOV/PGC/INT/M\(2025\)2](#)] and delegates were invited to provide written comments by 27 November 2025. A second draft of the Report [[GOV/PGC/INT\(2025\)11/REV1](#)], reflecting discussions and written comments received, incorporating insights from the PII dataset on Principle 11 and including information on dissemination, continued relevance and next steps, was shared with PIAC for comments by 27 February 2026. A third draft of the Report, reflecting comments by three Adherents, incorporating updated PII data and including PII data for Kazakhstan following its adherence to the 2017 Recommendation as of 17 February 2026, was shared with PIAC for transmission to the PGC for approval by 11 March 2026 [[GOV/PGC/INT\(2025\)11/REV2](#)]. A fourth draft of the Report, reflecting factual correction requested by one Adherent, limited updates to the PII data in light of latest validated assessments by 10 March 2026, updated references and minor editorial changes, was submitted to the PGC for approval by 26 March 2026 [[GOV/PGC/INT\(2025\)11/REV3](#)].

9. The PGC subsequently approved the Report [[GOV/PGC/INT\(2025\)11/REV3](#)] via written procedure on 26 March 2026 and agreed to its transmission to the Council to be noted and declassified. Following approval, adjustments were made to the Report, at the request of one Adherent, to the description of their domestic situation. The PGC was informed of these adjustments [[GOV/PGC/INT\(2025\)11/FINAL](#)]. The Report will be made available on the [online Compendium of OECD legal instruments](#).

Summary

Implementation

10. The Report highlights that Adherents have made progress in implementing the Recommendations, though the pace and focus of reforms vary. Adherents have prioritised different provisions, reflecting diverse policy contexts, regulatory and institutional arrangements and capacities.

11. The Report shows that many Adherents have made notable progress in addressing corruption and strengthening public integrity across the pillars of the Recommendations. The increase in the adoption of anti-corruption and integrity strategies in the past decade is particularly noteworthy, reflecting improved understanding, political commitment and ability across Adherents to approach anti-corruption and public integrity in a coherent and comprehensive manner. Adherents have also strengthened standards of conduct for public officials, including on conflict of interest, and notable efforts have been made to improve transparency and stakeholder engagement in policy making. For example, an increasing number of Adherents are establishing regulatory frameworks to enhance transparency and integrity in lobbying and influence activities, enabling them to address the realities of a changing lobbying and influence landscape, mitigate risks of foreign interference and meet citizens' expectations, even though this area remains underregulated.

12. Notwithstanding these advancements, the Report also highlights that room for improvement remains across all principles of the Recommendations. In particular, Adherents grapple with sustaining and ensuring impact of efforts aimed at instilling a culture of integrity and openness in the public sector and across the whole of society, including by raising awareness, promoting civic education, maintaining partnerships, building capacities, breaking through a culture of silence and protecting whistleblowers. In addition, a lack of monitoring and enforcement hampers the effective implementation of relevant regulatory frameworks and organisational policies across Adherents. Further

efforts can be made to strengthen judicial integrity and transparency and integrity in decision-making to improve accountability. Overall, scepticism toward the integrity of high-level officials and perceptions around undue influence in policy making remain widespread and trust in the civil service is decreasing.

Dissemination

13. The Report finds that the dissemination of the 2003 and 2017 Recommendations by Adherents and the Secretariat has significantly contributed to raising awareness and underscoring their relevance in strengthening public integrity and combating corruption. Besides the Public Integrity Handbook, the Toolkit for Managing Conflict of Interest and the OECD Public Integrity Maturity Models that provide guidance to Adherents in implementing the 2003 and 2017 Recommendations, the data and analysis provided by the PIIs and the Anti-Corruption and Integrity Outlook have accelerated the dissemination of the Recommendations. Complementing these efforts, the OECD Integrity Reviews provide tailored policy recommendations based on a comprehensive and in-depth analysis of a country's public integrity framework across the provisions of the Recommendations.

14. Beyond the committee and working party meetings, the annual Global Anti-Corruption and Integrity Forum (GACIF) gathers leaders from government, civil society, and the private sector from across the globe for policy dialogue on key integrity issues and trends that further contributes to disseminating the provisions enshrined in the Recommendations. In addition, the Secretariat engages Adherents and non-Adherents through regional networks for Asia and the Pacific, Latin America and the Caribbean, and the Middle East and North Africa, and facilitates public-private partnership through the Galvanising the Private Sector programme.

15. The relevance of the policy issues covered by the Recommendations in relation to broader public governance issues and trends is further reinforced through the widespread dissemination of PII data in the Anti-Corruption and Integrity Outlook and other OECD flagship publications. Beyond the OECD, the Secretariat has promoted the Recommendations' principles in relevant national and international forums, including the Conference of the States Parties to the United Nations Convention against Corruption, the G20 Anti-Corruption Working Group or relevant meetings of the Council of Europe's Group of States Against Corruption.

Continued relevance

16. The Report demonstrates that the Recommendations continue to be of high relevance to Adherents, and to the work of the PGC and PIAC, while acknowledging remaining implementation gaps. This has also been stressed by Adherents during the informal consultation in March 2025, the PIAC Chair's presentation at the October 2025 PGC meeting [[GOV/PGC/A\(2025\)6/REV2](#)] and the discussion of the draft Report at the PIAC meeting in November 2025 [[GOV/PGC/INT/M\(2025\)2](#)]. No revisions are therefore required in the short-to-medium term.

17. Recent developments have shown that strengthening institutional safeguards, enhancing transparency and enforcing ethical standards remain essential to fostering public trust and ensuring that both elected officials and civil servants are acting in the public interest. At the same time, Adherents are dealing with growing fiscal pressures and a changing geopolitical landscape. While these circumstances underscore the need for preventing corruption and strengthening public integrity to avoid waste and ensure the

adequate use of public resources, they may also lead to shifts in policy focus and place pressures on the resources required to sustain anti-corruption and integrity efforts. It is therefore even more important for Adherents to increase the efficiency and effectiveness of their efforts to implement the Recommendations by moving from a rules-based to a risk-based approach.

18. Accordingly, work to support Adherents in implementing the Recommendations will continue and it is proposed to report back to the Council on their implementation, dissemination and continued relevance in ten years. An earlier report to the Council would be prepared if changes in the field warrant it.

Next steps

19. In light of the preceding, the Secretary-General invites the Council to adopt the following draft conclusions:

THE COUNCIL

- a) noted document [C\(2026\)65](#), in particular the Report set out in its Annex, and agreed to its declassification;
- b) encouraged Adherents to the Recommendations to:
 - i. continue implementing and disseminating the Recommendations among relevant government bodies and other stakeholders;
 - ii. address the challenges identified in the summary and conclusions of the Report, with the aim of further strengthening public integrity and combatting corruption;
- c) invited the Public Governance Committee, through the Working Party on Public Integrity and Anti-Corruption, to:
 - i. continue supporting Adherents in addressing the main challenges set out in the summary and conclusions of the Report;
 - ii. report back to the Council on the implementation, dissemination and continued relevance of the Recommendations in ten years or earlier, if developments in the field warrant it.

Annex. Report on the Implementation of the OECD Recommendation on Public Integrity and the OECD Recommendation on OECD Guidelines for Managing Conflict of Interest in the Public Service

1 Background

Origin and scope of the Recommendations

OECD Recommendation on Public Integrity

1. Adopted by the Council on 26 January 2017 on the proposal of the Public Governance Committee (hereinafter, the “PGC”) ([C(2017)5] and [C/M(2017)2], Item 6), the OECD Recommendation on Public Integrity [OECD/LEGAL/0435] (hereafter, “the 2017 Recommendation”) updated and replaced the OECD Recommendation on Improving Ethical Conduct in the Public Service Including Principles for Managing Ethics in the Public Service [OECD/LEGAL/0298] (hereafter, the “1998 Recommendation”). It is based on the premise that integrity, one of the pillars of political, economic and social structures, is essential to a strategic and sustainable response to corruption, and to the economic and social well-being of individuals and societies. The 2017 Recommendation was developed to provide Adherents³ with the blueprint for a public integrity system. It shifts the focus from *ad hoc* integrity policies to a comprehensive, risk-based approach with an emphasis on cultivating a culture of integrity across the whole of society. The 2017 Recommendation’s 13 principles are organised in three pillars: (1) building a coherent and comprehensive public integrity system; (2) cultivating a culture of public integrity; and (3) enabling effective accountability (Figure 1).

- The first pillar, building a coherent and comprehensive public integrity system, involves demonstrating political and management commitment and clarifying institutional responsibilities for the public integrity system. Moreover, it encompasses developing a strategic risk-based approach and setting high standards of conduct.
- The second pillar, cultivating a culture of public integrity, includes investing in the integrity leadership of public managers and promoting a merit-based professional public service, as well as providing information, training, guidance and advice for public officials. This pillar also includes supporting an open organisational culture that is responsive to public integrity concerns and a whole-of-society approach to integrity.
- The third pillar, enabling effective accountability, involves applying a control and risk management framework and ensuring effective enforcement responses to integrity violations. Additionally, it includes reinforcing external oversight and controls and encouraging transparency and stakeholders’ engagement at all stages of the political process and policy cycle (Figure 1).

Disclaimer: The statistical data for Israel are supplied by and under the responsibility of the relevant Israeli authorities. The use of such data by the OECD is without prejudice to the status of the Golan Heights, East Jerusalem and Israeli settlements in the West Bank under the terms of international law.

³ At present, all OECD Members and four non-Members, Argentina, Kazakhstan, Morocco and Peru, are Adherents to the Recommendation.

Figure 1. The pillars and principles of the 2017 Recommendation



OECD Recommendation on OECD Guidelines for Managing Conflict of Interest in the Public Service

2. The Recommendation on OECD Guidelines for Managing Conflict of Interest in the Public Service [[OECD/LEGAL/0316](#)] (hereafter, the “2003 Recommendation”), adopted by the Council on 28 May 2003 on the proposal of the Public Management Committee (now called Public Governance Committee, hereafter, the “PGC”), responded to a growing demand to ensure integrity and transparency in the public sector, as increasingly close relationships between business and the public sector gave rise to the potential for new forms of conflict between individual private interests and public duties. It was developed to provide a framework to Adherents⁴ in reviewing and modernising their conflict-of-interest rules, policies and practices. To this end, the 2003 Recommendation defines four principles for managing conflict of interest, namely: i) Serving the public interest, ii) Supporting transparency and scrutiny, iii) Promoting individual responsibility and personal example, and iv) Engendering an organisational

⁴ References to Adherents throughout the Report refer to the OECD Members and non-Members having adhered to the 2017 and 2003 Recommendations, unless when referring specifically to one Recommendation.

culture which is intolerant of conflicts of interest. Based on these principles, the 2003 Recommendation outlines key steps for developing a policy framework for managing conflict of interest.

3. The 2003 Recommendation reflects policies and practices that have proved effective in OECD Member countries, and are intended to:

- Help government institutions and agencies to develop an effective conflict-of-interest policy that fosters public confidence in their integrity, and the integrity of public officials and public decision-making.
- Create a practical framework for reviewing existing solutions and modernising mechanisms in line with good practices in OECD Member countries.
- Promote a public service culture where conflicts of interest are properly identified and resolved or managed, in an appropriately transparent and timely way, without unduly inhibiting the effectiveness and efficiency of the public organisations concerned.
- Support partnerships between the public sector and the business and non-profit sectors, in accordance with clear public standards defining the parties' responsibilities for integrity.

Developments in the field since the adoption of the Recommendations

4. In recent years, several developments have shaped and impacted the implementation of both Recommendations by Adherents. Persisting low levels of trust in public institutions, high-profile corruption cases, or emerging global challenges, such as Artificial Intelligence (AI) and foreign interference, have driven countries efforts in strengthening their anti-corruption and integrity frameworks to combat corruption and its adverse impact on prosperity and democracy (OECD, 2024^[11]).

5. In addition, several OECD legal instruments have been revised in recent years that have had an impact on the implementation of the 2003 and 2017 Recommendations by Adherents. In 2024, in line with the commitments of the OECD Declaration on Building Trust and Reinforcing Democracy and corresponding Action Plans [OECD/LEGAL/0484], the OECD Recommendation on Transparency and Integrity in Lobbying and Influence [OECD/LEGAL/0379] was revised (Box 1). The revised Recommendation reflects the evolving lobbying and influence landscape, and helps actors in government, business and civil society to reinforce the frameworks for transparency and integrity in policymaking.

Box 1. Key features of the revision of the OECD Recommendation on Transparency and Integrity in Lobbying and Influence

- **Covers all actors involved in lobbying and influence activities.** The definition of “lobbying and influence actors” now includes all legal persons, domestic or foreign, that engage in lobbying and influence activities on their own behalf, representing interests in a policymaking or electoral process, including traditional lobbyists, as well as businesses, civil society organisations, think tanks, lobbying firms or law firms representing third-party clients, business and trade associations, trade unions, as well as the natural or legal persons, domestic or foreign, who engage in lobbying and influence activities, and who are mandated to represent these interests, whether or not they receive compensation for their activities.
- **Encompasses the broad toolbox of influence activities that lobbying and influence actors use to engage in policymaking processes and shape policy discourses.** This includes actions targeted at public officials carrying out the decision-making process, its stakeholders, the media or a wider audience, and aimed at promoting the interests of lobbying and influence actors with reference to public decision-making and electoral processes. This covers, for example, activities to shape public opinion and policy

debates through communications campaigns or influencing journalists, as well providing contributions to political parties and candidates.

- **Addresses the risks of interference by foreign powers in democratic processes through covert and deceptive lobbying and influence practices.** In particular, the principles recommend the disclosure of all lobbying and influence activities conducted by any lobbying and influence actor on behalf of foreign state interests, including foreign governments, foreign political parties or foreign state-owned and controlled entities. They also encourage governments to better account for this risk in their pre/post public office and employment regulations.
- **Provides for transparency and integrity rules for all those who are hired to provide advice or consultancy work to the government,** for example individual experts or private consultancy firms, to limit the risks of undue influence and conflicts of interests.
- **Provides a framework to support businesses and other influence actors in conducting their lobbying and influence activities in a responsible matter,** including ensuring that these activities align with their public commitments on broader environmental, social and governance goals.

Source: [\[OECD/LEGAL/0379\]](#)

6. Similarly, the Recommendation for Further Combating Bribery of Foreign Public Officials in International Business Transactions [\[OECD/LEGAL/0378\]](#) was revised in 2021 to further support the implementation of the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions [\[OECD/LEGAL/0293\]](#) (hereinafter, the “Anti-Bribery Convention”) and respond to recent trends and challenges in the foreign bribery field. In 2019, the Council adopted the OECD Recommendation on Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises (SOEs) [\[OECD/LEGAL/0451\]](#) that outlines how key responsibilities of the state as owner can be leveraged as tools for promoting integrity in SOEs, as part of the effort to strengthen corporate governance of SOEs.

7. Beyond the OECD, ongoing efforts by Adherents to implement the United Nations Convention against Corruption have also shaped their implementation of the 2003 and 2017 Recommendations. In addition, in 2023, the European Commission initiated an update of the legislative framework to better prevent and fight corruption across the European Union (EU), notably through a proposed Directive on combating corruption (European Commission, n.d.^[2]). The Commission also proposed a Directive establishing harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries (European Commission, 2023^[3]). Finally, in November 2025, the European Commission also launched the ‘European Democracy Shield’ including actions across three main pillars: 1) safeguarding the integrity of the information space; 2) strengthening our institutions, fair and free elections, and free and independent media; and 3) boosting societal resilience and citizens' engagement (European Commission, 2025^[4]). The G20-level, through its Anti-Corruption Working Group, promotes actions to prevent and counter corruption in cross-cutting priority areas relevant to the international community, including in close co-operation with the OECD.

Purpose of the Report

8. The purpose of this Report is to fulfil the Council’s instruction to the PGC to monitor, through the Working Party on Public Integrity and Anti-Corruption (hereinafter, the “PIAC”), the implementation of the 2017 Recommendation and to report to the Council no later than five years following its adoption and regularly thereafter. Regarding the 2003 Recommendation, the Council instructed the Public Management Committee (now the PGC) to report back to the Council on progress made in implementing the Recommendation within three years of its adoption. Three reports on the implementation of the 2003 Recommendation have been developed to this day: in 2006 [\[GOV/PGC\(2006\)4\]](#), 2009 [\[GOV/PGC/GF\(2009\)3\]](#) and 2014 [\[C\(2014\)7\]](#). The PGC’s 2017 standard-setting action

plan [[GOV/PGC\(2017\)4/FINAL](#)] envisaged that future reporting on its implementation would be consolidated within the implementation report of the 2017 Recommendation, as has been done in the present Report.

2 Methodology

9. The methodological approach for the development of this Report was discussed by the PIAC at its meeting in November 2024 [[GOV/PGC/INT/M\(2024\)2](#)]. As per these discussions, and to avoid overburdening national administrations with data collection exercises, PIAC agreed that the primary source of information for this Report is the data collected through the OECD Public Integrity Indicators (PIIs) across four datasets (Table 1). Whenever reference is made to ‘PII Respondents’ and unless indicated otherwise, this refers to Adherents that have validated the assessment for the respective PII dataset.

Table 1. PII datasets and Respondents

Dataset	Date	PII Respondents
Quality of anti-corruption and integrity strategic framework	Latest validated data, accessed 10 March 2026	41 countries: Argentina, Australia, Austria, Belgium, Canada, Chile, Colombia, Costa Rica, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Israel, Italy, Kazakhstan, Korea, Latvia, Lithuania, Luxembourg, Mexico, Morocco, Netherlands, New Zealand, Norway, Peru, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye, United Kingdom, United States
Effectiveness of internal control and risk management	Latest validated data, accessed 1 December 2025	31 countries: Argentina, Australia, Austria, Canada, Chile, Costa Rica, Czechia, Denmark, Estonia, Finland, France*, Greece, Ireland, Japan, Korea, Latvia, Lithuania, Luxembourg, Mexico, Netherlands, Norway, Peru, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Switzerland*, Türkiye, United States
Integrity of the justice and disciplinary systems	Latest validated data, accessed 10 March 2026	32 countries: Argentina, Australia, Austria, Belgium, Canada, Chile, Colombia*, Costa Rica, Czechia, Denmark*, Finland, France, Germany, Greece*, Hungary*, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico*, Netherlands, Norway, Peru, Poland*, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Türkiye
Accountability of public policymaking	Latest validated data, accessed 10 March 2026	40 countries: Argentina, Australia, Austria, Belgium, Canada, Chile, Colombia, Costa Rica, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Israel, Italy, Kazakhstan, Korea, Latvia, Lithuania, Luxembourg, Mexico, Morocco, Netherlands, New Zealand, Norway, Peru, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Türkiye, United Kingdom, United States

Source: OECD Public Integrity Indicators Database

Notes: ‘PII Respondents’ refers to the Adherents that have validated the assessment for the respective datasets. Where countries are marked by a “*” the dataset has only been partially validated. Other countries that have validated PII data but are currently not Adherents have not been included.

10. In addition to the data from the PIIs and where data is not available the OECD Secretariat collected country experiences in a consultation on the implementation of pillar II (culture) on 27 March 2025, to which all Adherents were invited. Additionally, the Report builds on the findings presented in the 2024 OECD Anti-Corruption and Integrity Outlook, OECD Integrity Reviews and other country-specific analyses, as well as complementary OECD data and reports on trust in public institutions, public procurement, open government, public service leadership and capability and regulatory policy.

3 Implementation

Pillar I: System

11. Pillar I of the 2017 Recommendation recommends that Adherents build a coherent and comprehensive public integrity system. The pillar is structured around four principles that set out the efforts needed to achieve this goal: commitment (Principle 1), responsibilities (Principle 2), strategy (Principle 3) and standards (Principle 4).

12. Similarly, the 2003 Recommendation emphasises the need to set clear rules on what is expected of public officials in dealing with conflict-of-interest situations, as well as commitment at organisational and managerial levels to implement said rules, supported by organisational strategies and clear institutional responsibilities for implementation and enforcement.

Principle 1: Commitment

13. Principle 1 of the 2017 Recommendation states that Adherents should:

“Demonstrate commitment at the highest political and management levels within the public sector to enhance public integrity and reduce corruption, in particular through:

- a) ensuring that the public integrity system defines, supports, controls and enforces public integrity, and is integrated into the wider public management and governance framework;*
- b) ensuring that the appropriate legislative and institutional frameworks are in place to enable public-sector organisations to take responsibility for effectively managing the integrity of their activities as well as that of the public officials who carry out those activities;*
- c) establishing clear expectations for the highest political and management levels that will support the public integrity system through exemplary personal behaviour, including its demonstration of a high standard of propriety in the discharge of official duties.”*

14. Similarly, the 2003 Recommendation emphasises leadership commitment, including the need for senior officials and managers to “arrange their private-capacity interests in a manner that preserves public confidence in their own integrity and the integrity of their organisation, and sets an example to others” as well as the importance of ensuring that the conflict-of-interest policy remains effective and relevant in a continuously evolving environment.

15. Assessing the level of implementation by Adherents of Principle 1—demonstrating commitment at the highest political and management levels in the public sector—remains challenging, as it overlaps with several other Principles. While most Adherents have technically implemented most elements of this Principle, gaps persist in certain cases regarding its enforcement.

16. As a first step, establishing a **common definition of public integrity** shared by political leaders and senior managers is key for Adherents to demonstrate a sustained effort to strengthen integrity and combat corruption (OECD,

2020_[5]). This is generally articulated in anti-corruption strategies and legislative frameworks, as further discussed under principles 3 (strategy), 4 (standards) and 13 (participation).

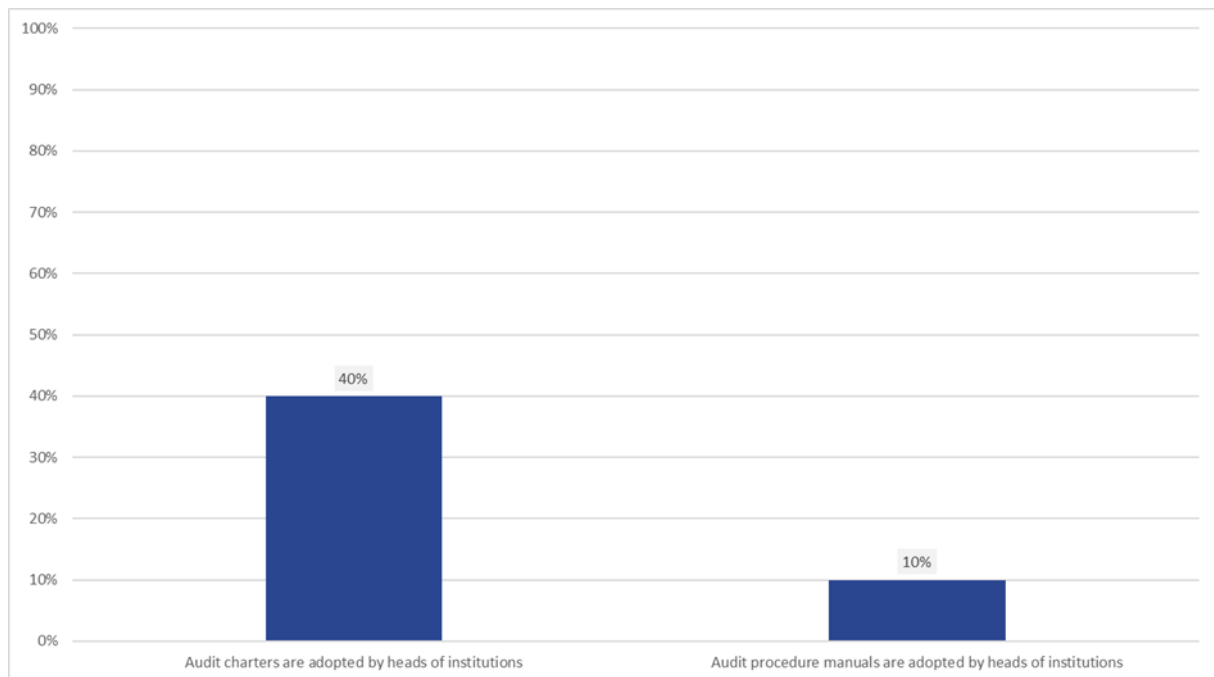
17. Once defined, public integrity requires high-level commitment to **support, control and enforce** it. Core elements that support public integrity aim to ensure that public officials understand their integrity roles and responsibilities and can rely on the financial and human resources and guidance available for maintaining public integrity. These core elements also include a **strategic approach** to anti-corruption and public integrity, which, if adopted by the Government (e.g. Council of Ministers), is considered a key indication of political commitment (OECD, 2024_[11]). As further discussed under Principle 3 (strategy), two-thirds of PII Respondents (68%) have a strategy that focusses on mitigating fraud and other corruption risks that was adopted at the highest political level (OECD, 2025; 2026_[6]). It should be noted, however, that enhancing integrity is not just the responsibility of the Government. A wide range of actors (e.g. finance, legal, internal control, human resource management, procurement) have a role in mainstreaming public integrity into the public management and governance framework, as discussed throughout this Report. Although their primary purpose is not to support, control or enforce public integrity, without them the system could not function (OECD, 2020_[5]).

18. Ensuring commitment to public integrity involves clearly stating within the legislative and/or institutional frameworks the **responsibility of all public organisations** for managing integrity (OECD, 2020_[5]). As further discussed under Principle 2 (responsibilities), many Adherents have established central co-ordination functions for public integrity strategies and defined legislative and institutional mandates in areas such as conflict-of-interest, open data policy, and political finance.

19. Moreover, most Adherents have established **clear expectations for the highest political and management levels**. Most Adherents take a risk-based approach and apply higher standards to the most senior public officials, given their high-level responsibilities for policymaking, which entail greater risks to corruption, as well as the increased expectations by citizens for these officials to prioritise the public interest. Regulations in three quarters (75%) of PII Respondents define incompatibilities between public functions and other public or private activities, and another 73% have established cooling-off periods for public officials. 93% of PII Respondents require members of the Government to provide an interest declaration at a minimum upon entry into office, as well as upon renewal or change in office. 88% require the same of top tier civil servants. In addition, 87% of PII Respondents have adopted and published codes of conduct or ethics for ministers and 73% have such codes in place for political appointees, such as heads of government agencies or political advisors (OECD, 2025; 2026_[6]).

20. When it comes to investing in integrity leadership to demonstrate commitment, Adherents have offered trainings for leaders to hone their judgement in dealing with ethical dilemmas and complex conflict-of-interest situations. As further discussed under Principle 6 (leadership), Adherents are also increasingly embedding integrity leadership into competency frameworks, and some have developed practices specifically designed to ensure that integrity leadership moves beyond formal statements or aspirations and is embedded in practical, day-to-day decision-making.

21. Notwithstanding these strengths, and as further discussed in chapter 4 (standards), Adherents could step up efforts to ensure effective implementation and enforcement of relevant standards. This includes consistently monitoring compliance of public officials with established rules, as well as tracking institutional responses, for example in the form of recommendations for the resolution of conflicts of interest, as well as sanctions. In addition, commitment could be more fully embraced in organisational management and control, as illustrated by the fact that audit charters are adopted by heads of institutions in only 12 PII Respondents (40%), and only three PII Respondents (10%) follow this practice for audit procedure manuals (Figure 2).

Figure 2. Few Adherents demonstrate managerial commitment to internal audit

Note: Percentage of PII Respondents having adopted audit charters and procedure manuals at the level of heads of institutions. How to read: Audit charters have been adopted by heads of institutions in all sample organisations in 40% of PII Respondents. Source: OECD Public Integrity Indicators Database (accessed 1 December 2025)

22. In addition, many people still feel that decision-making favours private interests over the public good. On average across OECD countries, 43% of respondents to the OECD Trust Survey think that it is likely that a national government would accept the demands of a corporation promoting a policy beneficial to their industry but harmful to society. Scepticism about the integrity of high-level political officials is also widespread, with almost half of respondents (49%) predicting that a high-level political official would grant a political favour in exchange for the offer of a well-paid private sector job (OECD, 2024^[7]).

23. Although most Adherents have formally implemented the elements of Principle 1 (commitment) and relevant provisions of the 2003 Recommendation, enforcement gaps persist, particularly when senior political or managerial officials fail to meet integrity standards or properly manage private interests, and distrust in government remains widespread. Adherents should focus on ensuring that high-level commitments are effectively integrated into daily operations and organisational management processes. While risk-based standards such as interest declarations, cooling-off periods, and codes of conduct are widely in place, monitoring and enforcement remain inconsistent, and integrity leadership is not always demonstrated in practice. Oversight mechanisms also require strengthening, as relatively few institutions have established formal audit charters or procedure manuals.

Principle 2: Responsibilities

24. Principle 2 of the 2017 Recommendation recommends that Adherents:

“Clarify institutional responsibilities across the public sector to strengthen the effectiveness of the public integrity system, in particular through:

- a) establishing clear responsibilities at the relevant levels (organisational, sub-national or national) for designing, leading and implementing the elements of the integrity system for the public sector;*

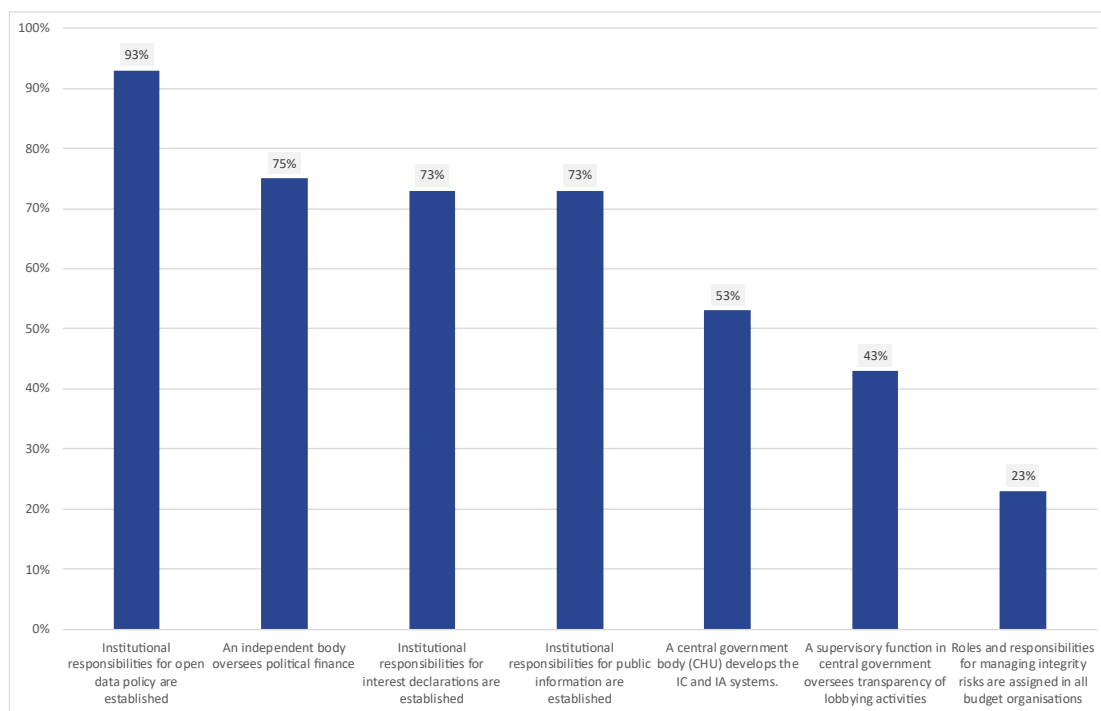
- b) *ensuring that all public officials, units or bodies (including autonomous and/or independent ones) with a central responsibility for the development, implementation, enforcement and/or monitoring of elements of the public integrity system within their jurisdiction have the appropriate mandate and capacity to fulfil their responsibilities;*
- c) *promoting mechanisms for horizontal and vertical co-operation between such public officials, units or bodies and where possible, with and between sub-national levels of government, through formal or informal means to support coherence and avoid overlap and gaps, and to share and build on lessons learned from good practices.”*

25. The 2003 Recommendation emphasises the importance of co-ordinating prevention and enforcement measures and integrating them into a coherent institutional framework. This includes assigning a central function with responsibility for developing and maintaining the conflict-of-interest policy and procedures.

26. Responsibilities for public integrity and anti-corruption are entrusted to one or more authorities within the public sector in all Adherents, ensuring at least a minimum level of implementation of this Principle across the board. However, significant variation remains regarding the mandates, capacities, and co-operation mechanisms of these authorities with other relevant entities, indicating considerable scope for further improvement. For example, PII data show that the public integrity strategies of 61% of PII Respondents are supported by a central function responsible for co-ordinating the implementation, monitoring, reporting and evaluation of the corresponding action plan. More than half of PII Respondents (59%) have action plans in place that identify lead organisations at least for each objective (OECD, 2025; 2026^[6]). Where such responsibilities are not clearly assigned, Adherents risk an uneven and fragmented implementation of their strategies, potentially weakening their effectiveness.

27. **Institutional responsibilities for integrity standards** are in place across most PII Respondents, although their scope and maturity vary by policy area (Figure 3). Almost all PII Respondents (93%) have a central government unit or an independent body overseeing open data policy. Oversight of political party and election campaign financing is ensured by an independent authority in three quarters (75%) of PII Respondents. Almost as many (73%) have clear regulations assigning responsibilities for managing conflict-of-interest or asset declaration systems and have supervisory bodies for public information in place. By contrast, institutional frameworks for lobbying remain less developed: only 43% of PII Respondents have a central government body with responsibility for overseeing the transparency of lobbying activities (OECD, 2025; 2026^[6]).

28. Similarly, while just over half of PII Respondents (53%) have one central government body that develops the internal control and internal audit systems, only seven (23%) have assigned risk management responsibilities across all budget organisations. This reveals a significant gap in the mechanism for ensuring effective risk management at the organisational level. Moreover, in just five PII Respondents (17%) is the body in charge of managing integrity risks separate from internal audit and reports directly to the head of the institution. When these responsibilities are not clearly delineated, there is a risk of blurred mandates, which can undermine the independence of internal audit as the third line of assurance, in contrast to risk management bodies that operate at the second line of assurance in the audit and control system. Without independence, the internal audit activity loses its distinctive status and value, and risks operating as a second line role similar to risk and compliance functions (IIA/INTOSAI, 2022^[8]; OECD, 2020^[5]).

Figure 3. Roles and responsibilities for managing integrity risks

Note: Percentage of PII Respondents fulfilling different criteria on institutional responsibilities regarding integrity risks. How to read: 93% of PII Respondents have a central government unit or body responsible for open data policy.

Source: OECD Public Integrity Indicators Database (accessed 1 December 2025 and 10 March 2026)

29. Nevertheless, in addition to assigning responsibilities, each actor of the integrity system requires sufficient **financial, technical and human resources** that are in line with its mandate, as well as the appropriate capacities to fulfil its responsibilities (OECD, 2020^[5]). Constraints in staffing and budgets remain a persistent challenge for public integrity functions among Adherents. This is the case in particular in the area of internal audit, with only 20% of PII Respondents having staffed internal audit units in line with legal requirements, and an even smaller share (just 10%) are ensuring that these units have at least two auditors (OECD, 2025; 2026^[6]). Similarly, in the area of asset and interest declaration verification, responsible bodies lack the necessary resources and tend to quickly become overburdened by the high volume of submissions (OECD, 2023^[9]; OECD, 2022^[10]).

30. With regards to co-ordination efforts between the different actors, both horizontally across the public sector and vertically between the national, regional and sub-regional levels of governments, many Adherents have established mechanisms to ensure coherence and avoid duplications and overlaps. Some have integrity advisory functions or integrity contact points to facilitate co-ordination of integrity and transparency policies with other organisations and jointly with other integrity actors (OECD, 2020^[5]). Different models exist across Adherents for institutionalising this function in a central government body, through an independent or semi-independent specialised body, or through integrity units or advisors integrated within line ministries (OECD, 2020^[5]). Ideally, an integrity contact point should dispose of its own budget to implement the activities related to its mandate (OECD, 2019^[11]). In some cases, though, the role of integrity contact point is an additional responsibility of an individual rather than a full-time, stand-alone position or dedicated unit, thus limiting capacities in this area. In other cases, integrity contact points and similar functions are duplicated across several bodies, leading to overlapping responsibilities (OECD, 2022^[10]; OECD, 2017^[12]). This duplication can cause confusion among staff seeking guidance, increase costs and reduce effectiveness.

31. Whether through formal or informal mechanisms, a key advantage of bringing relevant integrity actors together and promoting a **co-ordinated approach** is that integrity policies can draw on diverse expertise and foster

broad implementation across the public sector by encouraging ownership and commitment (OECD, 2018^[13]). To overcome silos, and foster co-ordination to ensure coherence in the implementation of the integrity system and promote a culture of integrity, most Adherents have adopted strategic approaches for anti-corruption and integrity. These approaches, which are further discussed under Principle 3 (strategy) can help pinpoint where potential silos exist, while providing incentives for units or organisations to co-operate as they perform activities and formulate common objectives (OECD, 2020^[5]). Some Adherents, such as Colombia, ensure mainstreaming of integrity through the Integrated Planning and Management Model (MIPG). The MIPG is reference framework for directing, planning, executing, monitoring, evaluating and controlling the management of Colombian public entities and bodies, including their implementation of the Integrity Code (Government of Colombia, n.d.^[14]). Other Adherents have established co-ordination mechanisms amongst integrity actors (Box 2).

Box 2. National co-ordination mechanisms

Peru's High-level Commission against Corruption (CAN)

Since 2010, Peru has been promoting inter-institutional co-ordination through the High-level Commission against Corruption (CAN) and, since 2013, through the Regional Anti-corruption Commissions at sub-national level. The CAN is a round table of institutions from the public sector, including autonomous entities, the legislative and the judiciary. Institutions from the private sectors and civil society are not full members; they can participate with voice but without vote. Bringing these actors around the table at regular intervals aims at promoting horizontal co-ordination and the coherence of the anti-corruption policy framework. The institutional presidency of the CAN rotates every two years.

Portugal's National Anti-Corruption Mechanism (MENAC)

Portugal's National Anti-Corruption Mechanism (MENAC) was created by Decree-Law 109-E/2021 with the aim of promoting transparency and integrity in public action and guaranteeing the effectiveness of policies to prevent corruption and related offences. The MENAC has several bodies, including the Advisory Council, the Accompanying and the Sanctions Committee. The Advisory Council brings together representatives from the public sector at the central level and the level of autonomous regions, the judiciary, academia and the business community to advising on the proposal for the three-year strategic plan, the annual activity plan and the annual report of the MENAC and on other matters submitted to it by the MENAC President. Subsets of these actors are represented on the Accompanying Committee, which is responsible for developing MENAC's activities, and the Sanctions Committee, which is responsible for exercising MENAC's powers regarding sanctions.

Source: (Government of Portugal, 2021^[15]; Government of Peru, 2025^[16])

32. Regarding **vertical co-ordination between levels of government**, PIIs show that 21 Respondents (51%) have at least one action plan that includes activities to collaborate with institutions at the sub-national level. This suggests that there is scope for increased synergies and co-ordination amongst integrity actors between levels of government.

33. Overall, there is a fair level of implementation of Principle 2 (responsibilities) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation. However, gaps remain when it comes to assigning responsibilities at the organisational level (e.g. risk management) as well as in specific policy areas (e.g. lobbying). Additionally, limited human and financial resources hamper integrity actors in executing their responsibilities properly, which has the potential to weaken the overall effectiveness of the integrity system. Whilst many Adherents have some mechanisms to co-ordinate integrity actors, there remains significant scope to strengthen synergies and enhance co-ordination, both horizontally and vertically.

Principle 3: Strategy

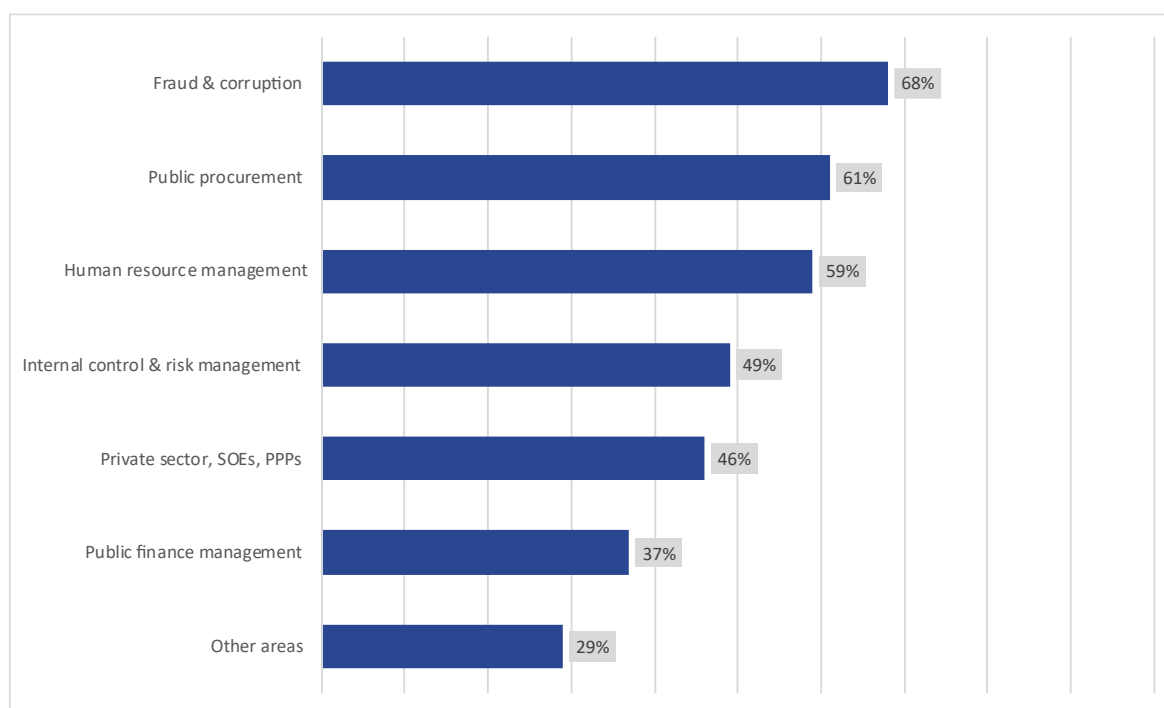
34. Principle 3 of the 2017 Recommendation states that Adherents should

“Develop a strategic approach for the public sector that is based on evidence and aimed at mitigating public integrity risks, in particular through:

- a) setting strategic objectives and priorities for the public integrity system based on a risk-based approach to violations of public integrity standards, and that takes into account factors that contribute to effective public integrity policies;*
- b) developing benchmarks and indicators and gathering credible and relevant data on the level of implementation, performance and overall effectiveness of the public integrity system.”*

35. Since the adoption of the 2017 Recommendation, Adherents have greatly intensified efforts to **develop a strategic approach** for mitigating corruption risks and promoting public integrity in line with the Recommendation. Since then, many Adherents have adopted an anti-corruption or integrity strategy for the first time, such as Costa Rica, Finland, France, Spain, Switzerland and the United States. In total, two-thirds (68%) of PII Respondents have an anti-corruption or integrity strategy focused on mitigating fraud and other corruption risks (OECD, 2025; 2026_[6]). Some Adherents have an anti-corruption and integrity framework at institutional level, developed and adopted by individual ministries and agencies. Other Adherents, such as Chile and Greece, following the good practice provided in the 2017 Recommendation, have upgraded their anti-corruption strategies from an institutional level to a whole-of-government strategic approach by adopting them by their Council of Ministers or equivalent mechanisms. This ensures the government’s buy-in and fosters political support for their implementation (OECD, 2024_[1]). At the same time, gaps between strategic cycles are commonplace, undermining the effectiveness of anti-corruption strategies as a tool for reform (OECD, Forthcoming_[17]).

36. The quality of national anti-corruption and integrity strategies has improved over time and strategies are becoming more comprehensive (OECD, Forthcoming_[17]). Notwithstanding a growing awareness that different types of corruption require tailored responses, strategies continue to focus on areas that have been traditionally prone to corruption and integrity risks, including public procurement (61%) and human resource management (59%). Slightly fewer strategies (46%) target private and public corporations, state-owned enterprises, and public-private partnerships (Figure 4) which are areas equally prone to corruption risks (OECD, 2024_[1]).

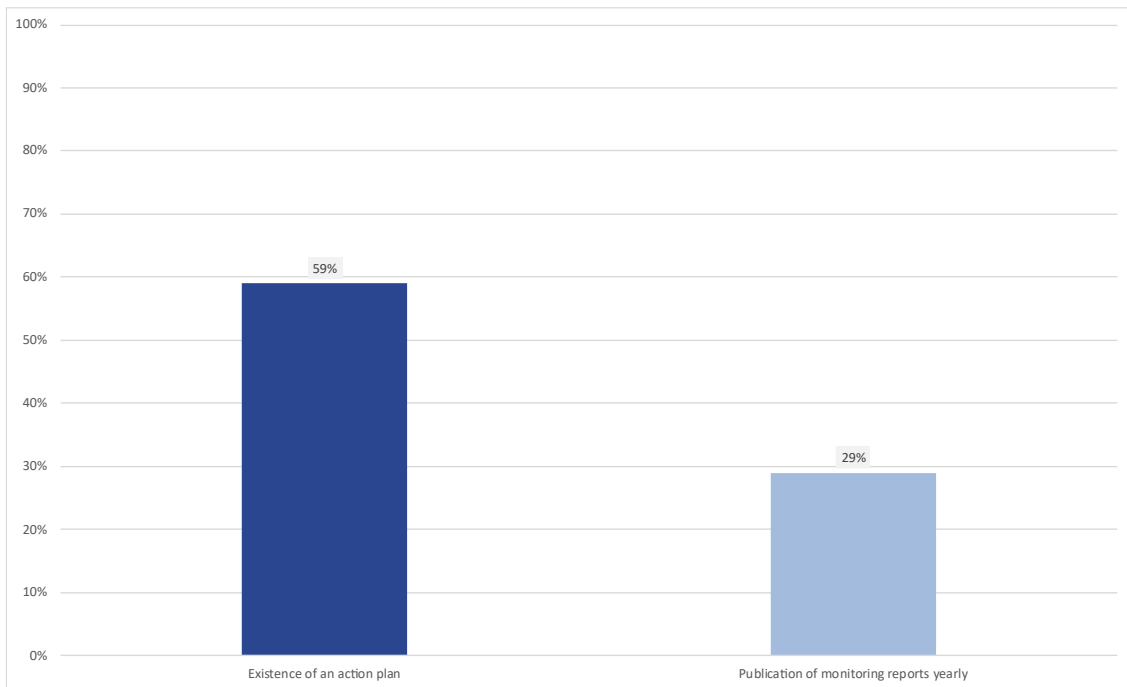
Figure 4. PII Respondents' anti-corruption strategies focus on traditional policy areas

Note: Percentage of PII Respondents having established strategic objectives for tackling different areas. How to read: 68% of Respondents have included strategic objectives on fraud and corruption in their anti-corruption strategies. "Other areas" refers to the country values for the criterion "Strategies for any of the following sectors have at least one first-level objective aimed at mitigating public integrity risks: (a) infrastructure, (b) housing, (c) health, (d) education, (e) taxation, (f) customs."

Source: OECD Public Integrity Indicators Database (accessed 10 March 2026)

37. On the other hand, fewer Adherents have strictly followed the 2017 Recommendation in the way they have developed their strategic approaches. On average, PII Respondents fulfil 29% of criteria related to the **use of evidence-based problem analysis and diagnostics tools** when developing strategic frameworks (OECD, 2025; 2026_[6]). Adherents could also invest more in broader **consultation** on strategies to benefit from insights from civil society and private sector actors (OECD, 2024_[11]). Only one third (32%) of strategies underwent basic public and inter-governmental consultation (OECD, 2025; 2026_[6]). The lack of an evidence-informed and inclusive approach to strategy development can help explain why emerging, high-risk areas are not prioritised and a whole-of-society approach is still not the norm (OECD, 2024_[11]).

38. **Implementation, monitoring and evaluation of strategic frameworks** is another area where Adherents can make improvements. Just under two-thirds (59%) of PII Respondents have an action plan in force to implement their strategic framework. However, only around half of those Respondents with an action plan in force (29% in total) also publish monitoring reports at least once a year (Figure 5). In turn, of those PII Respondents that do collect this data, the implementation rate is at 60% on average (OECD, 2025; 2026_[6]). Finally, 20 PII Respondents have prepared evaluation reports for all previous strategies, whereas only nine have an end-term-evaluation listed as an activity in their action plan to draw lessons learned (OECD, 2025; 2026_[6]). The absence of monitoring and evaluation makes it difficult to gauge levels of implementation, and to be sure that strategies are effectively achieving intended outcomes. Adherents with high-quality strategic frameworks invest not only in the design stage of the strategy cycle but produce solid action plans and ensure effective monitoring and evaluation (OECD, 2024_[11]).

Figure 5. Implementation and monitoring of public integrity strategies could be improved

Note: Percentage of PII Respondents with an action plan in force to implement the public integrity strategies, and of PII Respondents publishing monitoring reports at least once a year. How to read: While 59% of Respondents have an action plan in force to implement their public integrity strategies, only 29% publish monitoring reports on the implementation of the action plans on a yearly basis.

Source: OECD Public Integrity Indicators Database (accessed 10 March 2026)

39. Overall, the implementation of Principle 3 (strategy) is strong regarding the adoption of a strategic approach. This is a positive development since only a decade ago very few Adherents approached integrity and anti-corruption in a coherent and comprehensive manner. However, there is room to strengthen strategy development as few of them are based on detailed evidence or developed through broad consultation, which limits inclusiveness and responsiveness to emerging priorities. Implementation and monitoring practices also vary, with some Adherents lacking consistent action plans or regular reporting. Evaluation processes are still developing, and lessons from past strategies are not always fully incorporated.

Principle 4: Standards

40. Principle 4 of the 2017 Recommendation calls on Adherents to:

“Set high standards of conduct for public officials, in particular through:

- a) going beyond minimum requirements, prioritising the public interest, adherence to public service values, an open culture that facilitates and rewards organisational learning and encourages good governance;*
- b) including integrity standards in the legal system and organisational policies (such as codes of conduct or codes of ethics) to clarify expectations and serve as a basis for disciplinary, administrative, civil and/or criminal investigation and sanctions, as appropriate;*
- c) setting clear and proportionate procedures to help prevent violations of public integrity standards and to manage actual or potential conflicts of interest;*

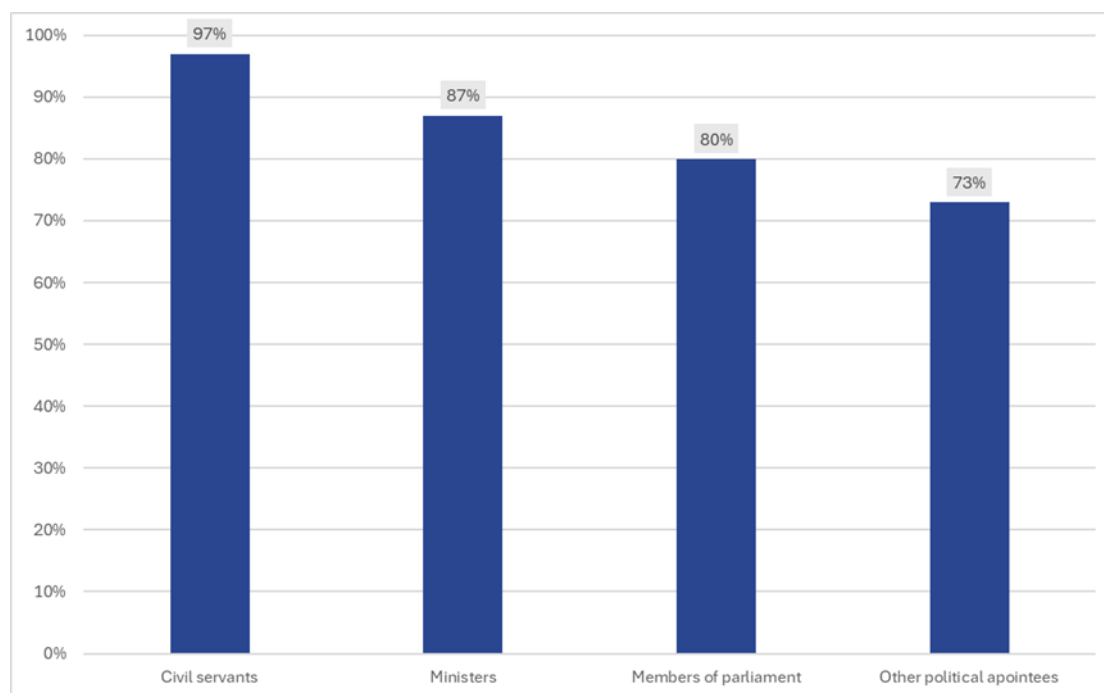
d) communicating public sector values and standards internally in public sector organisations and externally to the private sector, civil society and individuals, and asking these partners to respect those values and standards in their interactions with public officials.”

41. The development and implementation of standards of conduct to prevent and manage conflicts of interest is at the core of the 2003 Recommendation. The Recommendation suggests for Adherents to identify relevant conflict-of-interest situations by providing “a clear and realistic description of what circumstances and relationships can lead to a conflict-of-interest situation” and ensuring that conflict-of-interest policy is supported by organisational strategies and practices to help with identifying, managing and resolving such situations. This includes establishing procedures for public officials to identify, manage and resolve conflict-of-interest situations – real, apparent or potential. Procedures should be clear and practical to facilitate understanding and compliance, and the policy should be widely distributed both internally and externally to the private and non-profit sectors.

42. The 2003 and 2017 Recommendations are well implemented in the area of standards across Adherents. **Standards of conduct in the legal system and organisational policies**, setting out the basic principles and clarifying the boundaries of what is acceptable or what is illegal exist in all Adherents. These standards are enshrined in criminal law (e.g. bribery, fraud, embezzlement), civil law (e.g. liability of public officials, contributory negligence, whistleblower protection), or administrative law (e.g. freedom of information, political financing, lobbying). They usually include codes of conduct or codes of ethics, which bring together and illustrate diverse legal and regulatory frameworks that guide the behaviour of public officials (OECD, 2020_[5]). Through integration into organisational strategies and management frameworks, such codes play a key role in mainstreaming integrity culture across the public service.

43. Regarding **codes of conduct** or **codes of ethics**, most national regulatory frameworks use a combination of both instruments, which combine public service values with guidance on how to apply the expected standards and principles of conduct. This is the case for example with the Australian Public Service Act (1999) or Canada’s Values and Ethics Code for the Public Sector (2011) (Government of Canada, 2011_[18]) (Government of Australia, 1999_[19]). Such combinations find a balance between formulating general core values and offering public officials a framework to support day-to-day decision making (OECD, 2020_[5]).

44. The publication of codes of conduct or ethics is an essential means of **communicating the public sector values and standards** enshrined in them internally to public officials and civil servants, as well as externally - to the private sector, civil society and individuals - for these partners to respect those values and standards in their interactions with public officials. Almost all PII Respondents have adopted and published codes of conduct or ethics for civil servants (97%), as well as ministers (87%). Slightly fewer Respondents provide and publish such codes for political appointees, such as heads of government agencies or political advisors (73%) and Members of parliament (80%) (Figure 6). Many Adherents have also adopted tailored codes of conduct for specific at-risk sectors, for example in public procurement. According to a 2024 survey carried out amongst 40 countries including 36 Adherents, 85% of respondents have provisions that establish integrity principles for the public procurement workforce, for example by including such principles in the code of conduct for public procurement officials (OECD, 2025_[20]).

Figure 6. Most PII Respondents have codes of conduct or ethics for senior officials

Note: Percentage of PII Respondents that are publishing and applying codes of conduct or ethics. How to read: 87% of PII Respondents publish and apply standards of conduct and ethical behaviour for ministers.

Source: OECD Public Integrity Indicators Database (accessed 1 December 2025)

45. According to the PIIs, most Adherents have strong regulations codifying **standards to prevent and manage conflicts of interest** (OECD, 2024^[1]) (Box 3). On average, PII Respondents have adopted 80% of criteria for regulations on conflict of interest (OECD, 2025; 2026^[6]).

Box 3. Examples of regulations on conflict of interest

Argentina

Argentina's Law 25.188 on Ethics in the Exercise of Public Service Act (1999) sets out rules on conflict of interest for public servants at all levels and hierarchies, whether positions are held permanently or temporarily, by popular election, direct appointment, competition, or any other legal means. Decree-Law No. 19.549 on Administrative Procedure (1972), through its Article 6, requires public officials who may face a potential conflict of interest to recuse themselves from any administrative proceeding in which they are involved.

Australia

The Australian Public Service (APS) Code of Conduct—set out in section 13 of the Public Service Act 1999 and section 29 of the Public Governance, Performance and Accountability Act 2013 provide legislative requirements relating to the disclosure of personal interests held by APS employees and public officials. This legislation is supported by guidance that includes information about the circumstances and relationships that can lead to conflict-of-interest situations for public officials and the management of conflicts of interest that arise. Sanctions that may be imposed on an APS employee who is found to have breached the Code include: termination of employment, reduction in classification, reassignment of duties, reduction in salary, deductions from salary (by way of fine), a reprimand.

Japan

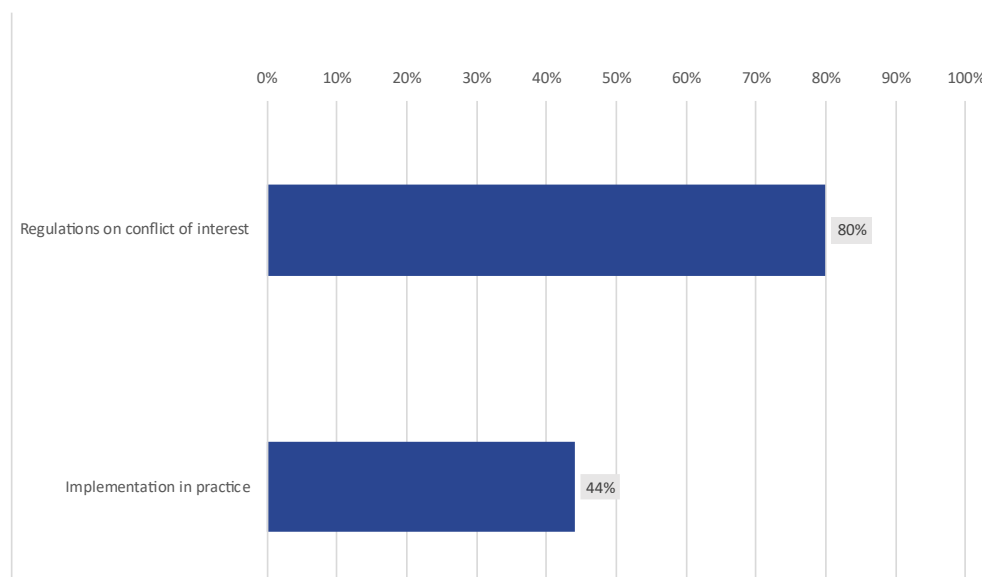
Japan's National Public Service Ethics Act and National Public Service Ethics Code establish a legally binding framework for the prevention of conflict of interest, imposing clear obligations and prohibitions on the national public employees in the regular service.

Source: (Government of Argentina, 1999^[21]; Government of Argentina, 1972^[22]; Government of Australia, 2013^[23]; Government of Australia, 1999^[19]; Government of Japan, 1999^[24]; Government of Japan, 2000^[25]) (Government of Australia, 2025^[26])

46. Many Adherents also have **policies to manage conflicts of interest that arise on an *ad hoc* basis**. This includes an established procedure for resolving conflicts when they occur. To help public officials navigate ethical dilemmas and conflicts of interest as they emerge, many Adherents have established dedicated advisory functions either at central or organisational level, which are further discussed under Principles 2 (responsibilities) and 8 (capacity building). Other Adherents are making use of digital tools to reduce barriers for seeking advice, such as, for example, Argentina with its conflict-of-interest simulator. Through a self-administered questionnaire that anonymises responses, users can determine whether they face incompatibility or conflict situations. The online tool received 4286 visits in the first half of 2025. Building on this success, Argentina launched the "Tina" chatbot in 2025, accessible via the official government website, via an app, as well as WhatsApp, providing 24-hour conversational interaction on incompatibilities and conflicts of interest (Anti-Corruption Office of Argentina, n.d.^[27]).

47. Notwithstanding the availability of conflict-of-interest regulations, the average implementation rate of these regulations among PII Respondents stands at 44% (Figure 7).

Figure 7. Availability of conflict-of-interest regulations and their implementation in practice



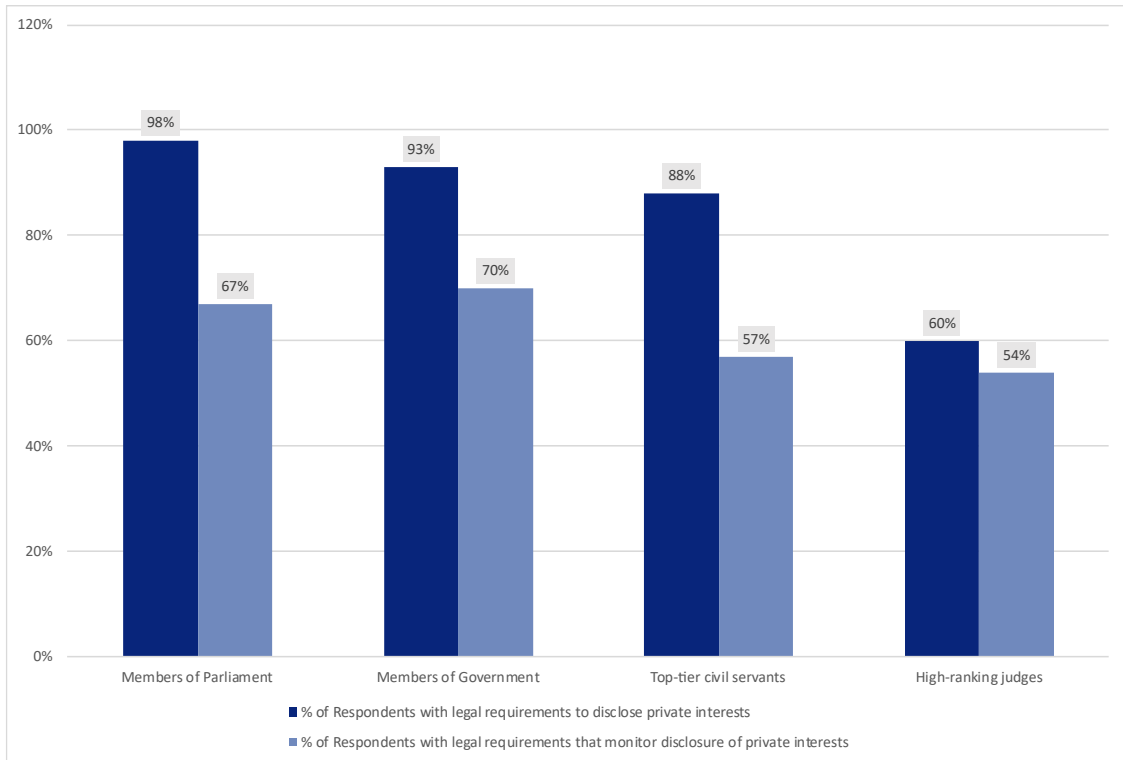
Note: Percentage of PII Respondents having fulfilled the criteria on regulation and practices for conflict of interest. How to read: While 80% of PII Respondents have enacted regulation to mitigate the risk of conflict of interest, only 44% of them have implemented practices to tackle this risk.

Source: OECD Public Integrity Indicators Database (accessed 10 March 2025)

48. Additionally, Adherents do not consistently monitor compliance with the standards. For example, regarding compliance with interest disclosure requirements, among the 37 PII Respondents (93%) that require members of

Government to provide interest declarations, data to monitor compliance with disclosure requirements are available in 27 Respondents (70%). Likewise, members of parliament are legally required to disclose their private interests in 39 PII Respondents (98%), but only 26 of them (70%) collect sufficient data to assess whether all declarations were fully disclosed. High-ranking judges are obliged to disclose their interests in 24 PII Respondents (60%), but full data on disclosure is only available in 13 countries (54%). The largest monitoring gap is for top-tier civil servants, where despite a legal requirement for disclosure in 35 Respondents (88%), only 20 of them (57%) monitor whether interests have been declared (Figure 8).

Figure 8. Interest declarations across public functions: regulations and monitoring



Note: Data for regulations is based on criteria values for “Any member of government / member of parliament / member of the highest bodies of the judiciary must submit an interest declaration, as a minimum upon entry and any renewal or change in public office” and “Any newly appointed or reappointed top-tier civil servant of the executive branch must submit an interest declaration”. Data for monitoring are based on statistics collected to calculate the criteria values for “The submission rate of interest declarations from: members of the Government is 100% for the past six years / members of parliament is at least 90% for the past six years / members of the highest bodies of the judiciary is at least 80% for the past four years / newly appointed or reappointed top-tier civil servants of the executive branch is at least 80% for the past four years.” “How to read: Members of government (Ministers) are legally required to disclose private interests in 93% Respondents. Among these countries, the disclosure of private interests is monitored in 70% of countries.”

Source: OECD Public Integrity Indicators Database (accessed 10 March 2025)

49. In addition to the monitoring of compliance with disclosure requirements, the verification of declarations of assets (e.g. financial holdings and investments, properties, securities and stocks, trusts) and interests (e.g. memberships, positions and outside activities, spouse or partner’s functions) plays a key role in identifying irregularities in a timely manner, helping responsible authorities to ensure that conflicts of interest are managed and violations are sanctioned as appropriate (OECD, 2024_[11]). However, many Adherents do not thoroughly verify declarations. Only 10 PII Respondents have verified at least 60% of asset and interest declarations in the past two years (OECD, 2025; 2026_[6]). This bears the risk that false, misleading or incomplete declarations could be submitted.

50. Similarly, only 12 PII Respondents can demonstrate that responsible authorities have issued recommendations for resolving conflicts of interest detected in the previous three years (OECD, 2025; 2026^[6]). For the remaining PII Respondents, either the responsible authorities have not issued recommendations for resolution or do not have data on whether conflicts have been resolved. This means that countries are unable to verify whether conflicts and the corruption risks they create are being mitigated. This raises questions regarding the effectiveness of the exercised oversight, but also the overall implementation of conflict-of-interest regulations in practice (OECD, 2024^[1]).

51. In terms of **sanctions**, three-quarters (75%) of PII Respondents have defined sanctions for breaches of conflict-of-interest regulations. However, in cases of non-compliance with the regulatory framework in the previous three years, only 15 PII Respondents have applied a sanction, whereas eight PII Respondents do not collect information on imposed sanctions (OECD, 2025; 2026^[6]). If sanctions are not adequately applied, this weakens their deterrent effect.

52. Finally, concerning integrity standards, one area of risk is **pre- and post-public employment**. Movement in and out of the public sector allows governments to benefit from a greater transfer of skills and knowledge, but if left unchecked, this “revolving door” phenomenon can lead to conflicts of interest among public office holders, undue influence over public policymaking, and unfair commercial advantages (OECD, 2014^[28]; OECD, 2021^[29]; OECD, 2017^[30]; Brezis and Cariolle, 2014^[31]; Lee and You, 2023^[32]; Strickland, 2023^[33]). These risks are addressed through varying approaches across Adherents, including rules and procedures such as cooling-off periods, subject-matter limits, time limits, disclosure of post-term engagements by holders of at-risk positions, and prohibiting any use of any “insider” information after they leave the public sector (Box 4).

Box 4. Examples of pre- and post-public employment frameworks

France

France monitors the “revolving door” of certain public officials and civil servants between the public and private sectors, regulating their movements before appointment to specific public positions, during their tenure and after leaving office when transitioning to the private sector.

According to Law no. 83-634 of 13 July 1983, on the rights and obligations of civil servants, the High Authority for Transparency in Public Life (HATVP) is required to conduct oversight on transitions to private sector roles, particularly for positions with prior regulatory or contractual relationships with private entities. For certain civil servants occupying the highest positions in the three civil services (this concerns over 15 000 civil servants), referral to the HATVP is mandatory for a period of three years following the end of public duties/services. Since Law no. 2019-828 of 6 August 2019 on civil service reform, the HATVP’s mandate has been extended to additional categories of civil servants. Referral to the HATVP is optional and subsidiary, and occurs only if the hierarchical authority has serious doubts about a project, even after consulting the ethics officer.

The HATVP may also initiate control *ex officio*, on the initiative of its president, within a certain period of time from either the creation or takeover of a company, or the start of the activity in the private sector, or the day on which the president learns about the failure to refer the matter to the HATVP.

The HATVP can issue binding opinions on compatibility, compatibility with reservations, or incompatibility between planned activities and previously held public duties. The control is double and involves a criminal risk assessment and an ethical risk assessment.

To manage pre-public employment risks, Law no. 2019-828 of 6 August 2019 on civil service reform entrusted the HATVP with overseeing access to certain high-level public positions. When a candidate has engaged in for-profit private activities in the past three years, administrations must consult the HATVP before making appointments to strategic roles, such as collaborators of the President and ministerial cabinet members, directors of central administrations or state public institutions appointed by the Council of Ministers, directors-general of

services in large local authorities (over 40,000 inhabitants), and directors of public hospitals with budgets exceeding EUR 200 million. If the administration fails to seek advice, the candidate may themselves refer the matter to the HATVP, which has 15 days to decide on the compatibility of the proposed appointment.

Since the enactment of Law No. 2024-850 of 25 July 2024, aimed at preventing foreign interference in France, the HATVP monitors the risk of foreign influence for former members of the government, members of autonomous administrative authorities, and heads of certain local executive bodies. When performed in light of this potential risk, the monitoring period is extended to five years.

Italy

Italy's Legislative Decree No. 165/2001 establishes a three-year cooling-off period during which public officials who exercised authoritative or negotiating powers are barred from working for private entities that benefited from their decisions. Article 21 of Legislative Decree No. 39/2013 extends this ban to senior officials and external appointees with significant decision-making influence, such as Secretaries-General or Heads of Department. Contracts or appointments made in violation are void, and offending private entities face a three-year ban on public contracts and must return any fees received. The National Anti-Corruption Authority (ANAC) oversees enforcement and has issued guidelines to ensure compliance.

Türkiye

Türkiye's Law no. 2531 of 1981 imposes a three-year cooling-off period barring former officials from roles or representation in areas where they exercised functions in the previous two years. Tax inspectors face the same restriction regarding taxpayers they audited, with violations punishable by six months to two years' imprisonment. Additional rules under the Capital Market, Banking, and Public Procurement Laws extend cooling-off periods to regulatory staff, Capital Markets Board members, and professional personnel, prohibiting them from joining entities they recently oversaw.

Source: (Government of Türkiye, 1981^[34]; Government of Italy, 2001^[35]; Government of Italy, 2013^[36]; Government of France, 2019^[37]; Government of France, 1983^[38]).

53. 29 PII Respondents have introduced mandatory cooling-off periods for public office holders, but only two PII Respondents have introduced cooling-off periods for lobbyists before they can take public office. Most importantly, most PII Respondents, including many with mandatory cooling-off periods, are not tracking the post-employment activities of public office holders. Only five PII Respondents collect data on the frequency within the past five years with which ministers took up positions in a private sector organisation that operates in their former area of responsibility. Only four collect the same data for the most senior civil servants (OECD, 2025; 2026^[6]). The lack of data makes it difficult for governments to assess whether pre- and post-public employment restrictions are being observed, and therefore whether they are mitigating the risks (OECD, 2024^[1]).

54. Overall, Adherents have established robust standards of conduct for public officials in their legal systems and organisational policies in line with Principle 4 (standards) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation, in particular regarding standards around conflict of interest. Despite the relative strength of regulatory frameworks in this area, Adherents could considerably strengthen efforts to ensure effective implementation of relevant standards. This includes consistently monitoring compliance and whenever relevant applying the necessary sanctions.

Pillar II: Culture

55. Pillar II of the 2017 Recommendation recommends that Adherents cultivate a culture of public integrity. The pillar is structured around five principles that set out the efforts needed to achieve this goal: whole of society

(Principle 5), leadership (Principle 6), merit-based (Principle 7), capacity-building (Principle 8) and openness (Principle 9).

56. The 2003 Recommendation puts a similar focus on the importance of culture. It includes building an organisational culture that is intolerant of conflicts of interest amongst the core principles that public officials are expected to observe. It also emphasises a policy framework for managing conflict of interest should be supported by organisational strategies and practices to help with identifying conflict-of-interest situations. Further, implementing a policy framework requires, amongst other things, demonstrating leadership, developing an open organisational culture in the public sector and initiating a new partnership with the business and non-profit sectors.

Principle 5: Whole of society

57. Principle 5 of the 2017 Recommendation recommends that Adherents:

“Promote a whole-of-society culture of public integrity, partnering with the private sector, civil society and individuals, in particular through:

- a) recognising in the public integrity system the role of the private sector, civil society and individuals in respecting public integrity values in their interactions with the public sector, in particular by encouraging the private sector, civil society and individuals to uphold those values as a shared responsibility;*
- b) engaging relevant stakeholders in the development, regular update and implementation of the public integrity system;*
- c) raising awareness in society of the benefits of public integrity and reducing tolerance of violations of public integrity standards and carrying out, where appropriate, campaigns to promote civic education on public integrity, among individuals and particularly in schools;*
- d) engaging the private sector and civil society on the complementary benefits to public integrity that arise from upholding integrity in business and in non-profit activities, sharing and building on, lessons learned from good practices.”*

58. The 2003 Recommendation also suggests creating “partnerships for integrity with the business and non-profit sectors by involving them in the elaboration and implementation of the Conflict of Interest Policy for public officials”.

59. Promoting a whole-of-society culture of integrity, requiring engagement of the private sector and the population as a whole, remains a challenge for most Adherents. More efforts are needed to implement this Principle. For example, it is telling that the private sector is covered only in two-thirds of anti-corruption and integrity strategies, even if there is widespread agreement that effective responses to future corruption risks will require engagement of actors from the whole society (OECD, 2024_[1]).

60. **Engaging relevant stakeholders in the development, regular update and implementation of the public integrity system** as required by the 2017 Recommendation is still not widespread among Adherents. Out of 27 PII Respondents that have an anti-corruption or public integrity strategy in place, only 13 (32%) have submitted their strategies to a mandatory public consultation. 18 strategies (44%) have been subject to extended consultations such as town hall meetings, and non-state actors were part of a working group to develop the strategy in 18 cases (44%) (OECD, 2025; 2026_[6]). Similarly, the recommendation to engage the business and non-profit sectors in the elaboration and implementation of conflict-of-interest policies for public officials of the 2003 Recommendation remains aspirational, limited mostly to increasing transparency of lobbying practices or including private sector and civil society in the monitoring of cooling-off restrictions, with the private sector also required to respect pre- and post-employment restrictions for public officials.

61. The lack of an inclusive approach to policy development and implementation can help explain why a whole-of-society approach is still not the norm (OECD, 2024^[11]). More broadly, limited inclusion in these processes may indicate to businesses, civil society, and citizens that their perspectives are not adequately considered in the development of integrity policies. This can result in less effective and less representative policy outcomes. Findings from the OECD Trust Survey illustrate the significance of this issue, showing a 47-percentage-point trust gap between individuals who believe they have a say in government decisions and those who do not (OECD, 2024^[7]).

62. On the other hand, several Adherents are engaging **the private sector on the complementary benefits to public integrity**. They have issued guidelines and manuals to companies to help them prevent corruption and foster integrity through risk-based compliance frameworks (Box 5). Additionally, several Adherents have supported companies in integrating the cultural perspective of integrity into their reporting, encouraging them to go beyond traditional compliance requirements. For example, Canada’s Office of the Superintendent of Financial Institutions issued a Regulatory Notice on Culture Risk Management in 2024 and Australia’s Financial Accountability Regime seeks to improve the governance and risk cultures of financial institutions (Government of Canada, 2025^[39]) (Government of Australia, 2025^[40]).

Box 5. Anti-corruption guidelines for the private sector

France

The French Anti-Corruption Agency issues formal Guidelines to Help Public and Private Sector Entities to Prevent and Detect Bribery, Influence Peddling, and Extortion, as part of the anti-corruption framework established under the Law on transparency, the fight against corruption and the modernisation of economic life (“Sapin II Law”) (2016). These guidelines set expectations for anti-corruption programmes, including risk assessments, codes of conduct, internal controls, and reporting mechanisms.

Germany

The Federal Ministry of the Interior provides comprehensive guidance, including directives and codes of conduct for corruption prevention. It also maintains a compliance manual and regularly updates the federal anti-corruption framework.

United Kingdom

The Ministry of Justice publishes official Guidance to Commercial Organisations on implementing “adequate procedures” to prevent bribery under the UK Bribery Act (2010). The guidance is based on six core principles: proportionality, top-level commitment, risk assessment, due diligence, communication, and monitoring/review, which serve as a foundation for effective integrity and anti-corruption programmes.

Sources: (French Anti-Corruption Agency, 2020^[41]; Government of the United Kingdom, 2010^[42]; Government of Germany, 2018^[43]; OECD/UN, 2024^[44])

63. Alongside regulatory compliance frameworks, Adherents increasingly implement a dual approach, combining sanctions and incentives, to promote robust private sector integrity. While stringent penalties, including both criminal and administrative liability for individuals and legal persons, continue to raise the costs and risks of corruption, there is also a growing emphasis on incentives that make ethical behaviour more attractive to companies. Several Adherents blend strict enforcement with public recognition schemes and business advantages for ethical conduct. Examples of incentives offered to companies with robust compliance systems include access to non-trial resolutions, reduced penalties, tax breaks, preferential interest rates, reputational benefits, or preferential access to public procurement (Table 2).

Table 2. Sanctions and incentives to promote a culture of integrity in the private sector

Sanction	Incentive	Purpose
Imprisonment	Exemption from prosecution Penalty mitigation	The incentive seeks to promote cooperation in investigations and provide a form of good behaviour credit to the accused.
Monetary sanctions		As with the above, good behaviour on the part of a company may result in lower monetary penalties or exemption from prosecution.
Suspension and debarment	“Allowlists” and procurement incentives	These aim to protect public markets from unethical suppliers.
Denial of government benefits	Preferential access to government benefits and tax benefits	Ethical suppliers can receive priority access to government services as well as tax benefits, while unethical suppliers will be denied these advantages.
Reputational damage	Reputational benefits	States can promote ethical suppliers or inflict damage on the reputation of unethical suppliers through a variety of means.

Source: (OECD/UN, 2024^[44])

64. Several Adherents have taken steps to harness behavioural insights to build and support integrity culture at organisational level. For instance, the Dutch government has promoted these insights across public institutions through the Behavioural Insights Network Netherlands, creating also an enabling environment for integrating psychological and behavioural expertise into regulatory and supervisory practices (Government of the Netherlands, 2014^[45]). This approach has influenced the financial sector, where supervision includes qualitative assessments of leadership, ethics, and organisational culture. A notable example is *De Nederlandsche Bank* which established a dedicated supervision team comprised of behavioural scientists and psychologists to assess organisational culture in financial institutions. Its assessments focus on observed behaviour, board oversight, and culture -related supervisory interventions beyond traditional financial risk measures (De Nederlandsche Bank, 2015^[46]). However, such behavioural approaches have not yet been widely adopted across all Adherents, remaining limited in both sectoral coverage and overall prevalence.

65. **Civil society organisations (CSOs)** also play a vital role in promoting a whole-of-society culture of public integrity as watchdogs, facilitators, service providers, advocates, and innovators, often filling gaps left by government or business. However, their impact and credibility depend on their adherence to high integrity standards. A lack of transparency in mission, governance, or funding can fuel perceptions of undue influence by private, economic, political or foreign interests. To maintain trust, CSOs are expected to ensure transparent financial reporting, sound governance, and robust accountability mechanisms. Good practices include the Global Standard for CSO Accountability, which outlines twelve commitments to strengthen transparency and integrity in civil society organisations (OECD, 2020^[5]; OECD, 2022^[10]).

66. Recent assessments made by the European Court of Auditors highlight persistent weaknesses in the transparency and accountability of public funding granted to CSOs in the EU. While progress has been made in improving oversight and reporting, authorities often fail to verify key aspects of CSOs governance, independence, and sources of financing. In many cases, checks rely heavily on self-declarations rather than systematic verification of potential conflicts of interest, foreign influence, or compliance with fundamental values such as human rights and the rule of law. Information on advocacy activities funded through public grants also remains incomplete or inconsistently disclosed (ERA, 2025^[47]). At the same time, civil society can contribute to a culture of integrity by exercising their watchdog function, yet this requires the existence of the needed digital tools (Box 6).

Box 6. Promoting integrity through civil society monitoring

In **Colombia**, open contracting measures, vendor engagement and increased civil society monitoring led to a reduction in direct awards between 2019 and 2020. Among procuring entities that use the system, SECOP II, there was a decrease of 6% in direct contracts in favour of competitive awards and a 17% increase in the average number of bidders, exceeding the government’s target of 5%. Particularly successful are open tenders, with purchases

made using this procurement method seeing a 21% increase in the average number of bidders over the previous year.

In **Slovakia**, a law implementing open contracting enabled civil society to monitor and identify cases of corruption exposing hospital scanners bought at double the normal price from a shell company connected to a high-ranking politician and cancelling contracts for expensive seafood, cognac and luxury cars. Almost 8% of the public now checks at least one contract or receipt online every year. The initiative cost less than EUR 850 000 in total to implement.

Source: (OCP, 2025^[48])

67. Finally, **public campaigns and awareness-raising initiatives, including civic education**, are a key tool for promoting a whole-of-society culture of integrity. These efforts aim to engage citizens of all ages, build societal resilience against corruption, and make integrity values part of everyday life. Several Adherents have invested in this area (Box 7).

Box 7. Public awareness campaigns promoting a culture of integrity

In **Greece**, under the National Anti-Corruption Plan 2022-205, the National Transparency Authority has worked with partners in civil society, the private sector and academia to raise awareness for public integrity with a focus on civil servants and young people as the main target groups. This has involved efforts to embed integrity matters in induction training and career development and engaging the private sector and civil society from the earliest stages of policy design. To inspire younger generations, Greece runs a biennial youth integrity competition attracting more than 2 000 participants, with the best entries widely showcased to amplify positive integrity messages.

Portugal has implemented a range of educational and outreach projects in partnership with the Court of Auditors between 2017 and 2022. These include an image contest on corruption for teachers and students, the “Schools Against Corruption Network” spanning 104 schools to foster anti-fraud initiatives, expert webinars for students, and school visits by auditors to explain their role in safeguarding public resources.

In **Latvia**, the Corruption Prevention and Combating Bureau implements the “Corruption Suffocates!” campaign, targeting both youth and the general public, alongside integrity workshops for schools and training for journalists to strengthen investigative capacity.

Slovenia’s Commission for the Prevention of Corruption leads awareness measures such as integrity training via the national administrative academy, partnerships with schools and universities, and career development policies to prevent bias in hiring and promotion.

Source: (KNAB, 2025^[49]; KPK, 2025^[50]) Consultations of PIAC delegates in March 2025, OECD Secretariat’s desk research.

68. In their awareness-raising efforts, Adherents face common challenges in sustaining impact, as highlighted by several PIAC delegates during the consultation meeting in March 2025. Campaigns risk losing momentum if they rely solely on one-off events or short-term projects. Achieving lasting impact requires stable resources, consistent messaging, durable partnerships between government, the private sector, and civil society, and the integration of integrity principles across education, professional development, and community engagement. Without such sustained efforts, awareness-raising can be perceived as symbolic rather than transformative, limiting its ability to drive lasting cultural change. This change remains particularly difficult to achieve contexts where public perceptions are driven by corruption scandals and trust in public institutions is lacking.

69. As recommended in several OECD Integrity Reviews, Adherents could strengthen integrity awareness by institutionalising communications capacity, for example, through dedicated whole-of-society communications units within relevant integrity bodies. These units can develop comprehensive strategies that define target audiences, key messages, channels, and outputs, ensuring alignment with broader integrity objectives. Public trust is reinforced when campaigns showcase positive examples, such as “everyday ethical public officials,” and highlight successful initiatives. Partnerships with ministries in high-risk sectors can further embed integrity awareness into citizen-facing activities, expanding reach and impact (OECD, 2024^[51]) (OECD, 2022^[10]) (OECD, 2022^[52]) (OECD, 2021^[53]) (OECD, 2019^[11]). To be effective, public information campaigns should be sustained, well-resourced, and carefully designed to link awareness-raising with concrete anti-corruption measures. As behavioural insights suggest, campaigns focusing solely on moral messages—such as slogans like “no to corruption” or “corruption is bad”—are unlikely to be effective, as people already know that corruption is wrong (OECD, 2018^[54]). What they need are messages with clear, practical ways to act—such as requesting information or reporting misconduct—combined with visible government and judicial follow-up. Poorly designed campaigns can backfire, normalising corruption, fostering resignation, and undermining trust in reforms.

70. Overall, Adherents have made limited progress in implementing Principle 9 (whole-of-society) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation. Engagement of relevant stakeholders in the development, update and implementation of the public integrity system remains limited, more could be done to encourage the private sector, civil society and individuals to uphold integrity values as a shared responsibility, and awareness raising, including civic education face challenges in achieving lasting impact. Most Adherents will need to implement this Principle more consistently in order to truly promote a whole-of-society culture of public integrity.

Principle 6: Leadership

71. Principle 6 of the 2017 Recommendation calls on Adherents to:

Invest in integrity leadership to demonstrate a public sector organisation’s commitment to integrity, in particular through:

- a) including integrity leadership in the profile for managers at all levels of an organisation, as well as a requirement for selection, appointment or promotion to a management position, and assessing the performance of managers with respect to the public integrity system at all levels of the organisation;*
- b) supporting managers in their role as ethical leaders by establishing clear mandates, providing organisational support (such as internal control, human resources instruments and legal advice) and delivering periodic training and guidance to increase awareness of, and to develop skills concerning the exercise of appropriate judgement in matters where public integrity issues may be involved;*
- c) developing management frameworks that promote managerial responsibilities for identifying and mitigating public integrity risks.”*

72. The 2003 Recommendation highlights the need for managers to be prepared to exercise judgement in dealing with conflict-of-interest situations and thus the need for mechanisms to develop the skills of managers in identifying and resolving or managing conflicts in their day-to-day work.

73. Most Adherents have taken action to implement this Principle. They apply various measures to uphold **integrity in the selection, appointment, and promotion of managers**. In addition to the measures discussed under Principle 7 (merit), these include background checks, pre-screening for high-risk roles, security clearances, and in some cases, situational judgement or integrity tests to assess candidates’ suitability for leadership positions (Box 8).

Box 8. Background and integrity checks for selecting managers

In **Lithuania**, the Special Investigation Service (STT) conducts corruption-prevention vetting for candidates to a wide range of high-level government and public sector positions, as required by the Law on Corruption Prevention. STT provides only legally defined factual information from official sources (e.g., criminal records, administrative or disciplinary violations, corruption-related case status) without giving approvals, recommendations, or personal evaluations, leaving the final appointment decision entirely to the appointing authority.

The **Netherlands** follows a similar approach. While not legally required for every public sector position, background checks, especially for leadership, government, or sensitive roles are a common and recommended practice. Key components include obtaining candidate consent and verifying criminal history through the Certificate of Conduct, as well as reviewing employment and education history. Financial integrity screenings are also used when relevant to the position. Employers must comply with the General Data Protection Regulation, ensuring checks are legitimate, relevant, and transparent. Dutch public administration, particularly for policymaking and leadership roles, has begun integrating self-assessment and risk analysis procedures.

In **Switzerland**, background checks are legally permitted and common for positions of high trust. Employers, including public sector organisations, routinely conduct checks on criminal records, financial integrity, employment history, and academic credentials, always requiring the candidate's explicit consent and adherence to strict data protection laws. These checks are mandated particularly in roles involving sensitive information or financial responsibilities. The Federal Act on Data Protection frames these processes, and further details are outlined in federal anti-corruption strategies and financial centre regulations.

Source: (Government of Switzerland, 2025^[55]; Government of the Netherlands, 2021^[56]; Special Investigation Service, 2020^[57]; Government of Lithuania, 2002^[58])

74. As encouraged by the 2017 Recommendation, **assessing the performance of managers with respect to public integrity** is a key component to strengthen integrity leadership. Many Adherents include integrity objectives into organisational performance assessments and explicitly require managers to demonstrate integrity in decision-making and to proactively manage risks (OECD, 2020^[5]). For example, in Colombia, the Integrated Planning and Management Model (MIPG) requires public managers to periodically report on their actions related to integrity, transparency and other cross-cutting issues (Government of Colombia, n.d.^[14]). In France, senior management are personally responsible and ultimately accountable for the effective implementation and promotion of an organisation's integrity programme (French Anti-Corruption Agency, 2020^[41]).

75. Nevertheless, it is important to ensure that performance systems strike an appropriate balance, so as not to unintentionally encourage excessive risk aversion, which could limit innovation, accountability, and the exercise of sound professional judgement in complex situations. The 2024 Standard EU/OECD Survey of Central Government Public Servants shows that employees are generally positive regarding the values-based and strategic leadership of their senior leaders, yet only 42% agree that they effectively lead change in their organisation (OECD, 2025^[59]).

76. While the **"tone at the top"** remains essential and is generally promoted by Adherents, the 2017 Recommendation also promotes that integrity leadership be reinforced throughout all levels of the public sector. Leadership is increasingly understood not only as a formal or hierarchical role, but also as the ability to inspire, guide, and motivate others toward shared goals—qualities that can be demonstrated by staff at all levels, not only senior officials (OECD, 2020^[5]). Middle and line managers are central to translating this approach into practice. They reinforce integrity-driven behaviours through day-to-day interactions with staff, communicate expectations, provide feedback and recognition, and apply human resource processes such as performance appraisals and disciplinary actions, which in some contexts are exercised with considerable discretion (OECD, 2023^[60]) (OECD, 2025^[61]). Beyond performance management, many managers now play a much broader role in human resource functions —

head-hunting candidates, conducting interviews, designing assessment mechanisms, onboarding new staff, developing job descriptions, providing training, mentoring and managing employees' career development. These activities carry important integrity implications, underscoring the need to embed ethical standards and fairness principles throughout all stages of the employment lifecycle.

77. Leadership approaches that are values-driven, adaptable and reinforced by an organisational culture that enables ethical behaviour and is actively demonstrated by leaders and staff across the public sector, are more likely to sustain integrity leadership. Adherents such as Canada and Spain (Box 9) are reflecting this broader perspective in civil service competency frameworks and, in some contexts, linking it to performance indicators (OECD, 2019^[11]).

Box 9. Integrity in public service leadership competency profile

Canada's Key Leadership Competency profile frames integrity as the foundation of effective public service leadership, defining clear expectations for both exemplary and unacceptable behaviour. Good leaders are expected to act with unwavering ethical standards, provide impartial, evidence-based advice, uphold fairness and transparency, model respect for diversity and inclusion, and foster a safe, harassment-free workplace, while also engaging in self-reflection and holding themselves and others accountable. In contrast, poor leadership is marked by disregarding audit findings, neglecting financial and information integrity, avoiding difficult conversations about performance, failing to address conflict, ignoring diversity, and making opaque or biased decisions. These standards make explicit the leader's dual function: to serve the public interest with professionalism and to cultivate an organisational culture grounded in trust, respect, and accountability.

In **Spain**, Ministerial Order TDF/379/2024 defines a basic competency framework for senior officials. Within this framework, "Commitment to public service and professional ethics" is explicitly defined and broken down into five competencies: i) prioritising the general interest and the public over private agendas; ii) promoting efficiency through lifelong learning; iii) applying civil service values to leadership and institutional action; iv) acting with ethical standards and personal integrity; and v) promoting a culture of public integrity across the organisation.

Source: (Government of Canada, 2025^[62]; Government of Spain, 2024^[63]).

78. Leaders often face the dilemma of balancing ethical decisions against operational pressures, in a context of resistance to change and demands for rapid outcomes. As a response, those who integrate ethical "checkpoints" into decision-making, encourage scenario analysis, and foster open dialogue about trade-offs are better equipped to maintain both effectiveness and integrity (OECD, 2020^[5]). In line with the 2017 Recommendation, several Adherents have adopted measures that include enhanced backing for integrity coordinators, HR professionals, and ethics counsellors, as well as dedicated training programmes, peer mentoring, and networking opportunities. These practices aim to ensure that integrity leadership moves beyond formal statements or aspirations and is embedded in practical, day-to-day decision-making. Adherents yet to implement such measures may consider these approaches as part of a broader trend to strengthen integrity leadership in the public sector.

79. The 2017 Recommendation also promotes periodic training to support managers. While more training is always possible, many Adherents already provide some level of integrity training to managers across the public sector. In several Adherents, training centres or public service academies provide training for senior officials to enhance their skills to identify and address various integrity risks, including the resolution of ethical dilemmas and management of conflicts of interests. For example, the Australian Public Service (APS) Academy delivers integrity training for senior public service officials through programmes, such as Senior Executive Service (SES) Integrity Masterclass. Using scenario-based discussions, case studies, and panel reflections, the programme helps leaders develop the skills to identify and manage ethical dilemmas in both clear and ambiguous situations. The training emphasises the importance of exercising sound judgment, fostering open dialogue, and promoting a culture of

transparency and accountability across the public service. The APS Academy also incorporates integrity training through its other SES and leadership programmes (Australian Public Service Academy, 2025^[64]).

80. Overall, Adherents have made progress in implementing Principle 9 (leadership) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation, yet there remains scope to embed integrity considerations systematically into the selection, appointment, and promotion of managers. Greater attention could be given to equipping leaders at all levels, not only senior officials, with the skills to navigate conflict of interest, manage integrity risks, and effectively lead change in their organisations. Enhancing integrity competencies through leadership development, aligning performance assessments with behavioural outcomes, and providing strategic, continuous training would support leaders in demonstrating integrity and better preparedness to address complex situations.

Principle 7: Merit

81. Principle 7 of the 2017 Recommendation recommends that Adherents:

“Promote a merit-based, professional, public sector dedicated to public service values and good governance, in particular through:

- a) ensuring human resource management that consistently applies basic principles, such as merit and transparency, to support the professionalism of the public service, prevents favouritism and nepotism, protects against undue political interference and mitigates risks for abuse of position and misconduct;*
- b) ensuring a fair and open system for recruitment, selection and promotion, based on objective criteria and a formalised procedure, and an appraisal system that supports accountability and a public service ethos.”*

82. This Principle has been largely addressed by Adherents, although meritocratic safeguards remain vulnerable to loopholes. Similarly, the increasingly blurred line between the political level and the civil service adds pressure on the merit principle. Well-designed merit-based **recruitment, selection, and promotion** processes place the best-skilled candidates in the right roles, emphasising rigour, impartiality, and recognition that talent can come from outside traditional public service career paths. The core components of a merit-based system include: (i) predetermined qualification and performance criteria for each position (ensuring also that qualifications are relevant to the role and do not impose arbitrary barriers to promotion or external recruitment); (ii) objective and transparent recruitment processes that can reliably assess candidates, (iii) open application procedures guaranteeing equal opportunity for all qualified applicants, and (iv) oversight and recourse mechanisms to ensure consistency and fairness (OECD, 2020^[5]). Together, these elements not only safeguard integrity but also foster trust in public institutions by ensuring that opportunities are allocated fairly.

83. Across Adherents, the principle of competitive entry takes different forms, depending on whether their civil service operates under a career-based system, a position-based system, or a hybrid system. Likewise, selection safeguards are essential to ensure fairness, integrity, and professionalism in the civil service. Adherents such as Argentina or Portugal have put in place mechanisms to build consensus into decision-making and protect selection committees from political interference, to strengthen fairness and mitigate risks of favouritism or unconscious bias (Box 10).

84. Across Adherents, the principle that the best-performing candidate should be appointed is widely recognised, though implemented through different models. In France, for example, the highest-ranked candidate is appointed following competitive examinations, while Ireland and Portugal use ranked rosters to fill vacancies. Canada adopts a more flexible approach, granting managers discretion to compare and rank candidates based on merit criteria alongside broader factors such as talent management, employee retention, and team composition. Each model has strengths and trade-offs, and Adherents may seek to balance sectoral knowledge (often prioritised in exams) with practical capability emphasised in job-based systems (OECD, 2025^[65]) (OECD, 2025^[59]).

Box 10. Merit-based recruitment and selection processes

Competitive entry procedures

Türkiye implements central examinations under the General Regulation (Council of Ministers Decision 2002/3975) for those appointed to public duties for the first time. The system operates through central examination within frameworks of merit and equal treatment, with public institutions additionally recruiting through competition examinations for positions requiring special expertise. Article 41 of Law No. 657 specifies that career profession personnel must be admitted through special competition examinations, followed by three-year training periods and subsequent promotion through in-service examinations.

Germany's merit-based recruitment of civil servants is enshrined in article 33(2) of the *Basic Law*, which guarantees that every German is eligible for public office based solely on aptitude, qualifications, and professional achievements. This constitutional principle applies to both civil servants and public employees. Accordingly, when positions are filled through new recruitment rather than promotion, they must be publicly advertised, and selection decisions are made strictly on merit.

Spain's Basic Statute of the Public Employee Article 61.1 establishes that public employment must be accessed through public competition procedures based on principles of merit, capacity, and equality, with competitions being opposition-based, merit-based, or mixed. While this applies to all levels, Royal Decree 364/1995 Articles 40-45 specify that the highest-scoring candidate must be proposed for appointment.

Selection safeguards

Argentina employs an innovative approach through random selection from an accredited selector registry. Article 64 of the General Collective Labour Agreement requires selection bodies of at least five members, with professional or technical personnel serving as accredited selectors or technical assistants randomly selected from a central registry. Members may only be recused or excused with cause, applying Articles 17 and 30 of the National Civil and Commercial Procedural Code.

Portugal's Recruitment and Selection Commission for Public Administration (CRESAP) operates as an independent entity reporting to Parliament, conducting recruitment for top management positions. Selection boards consist of four members including CRESAP's President, one permanent member, one non-permanent member from the relevant Ministry, and one expert, ensuring both independence and sectoral expertise.

Source: (G20, 2025^[66])

85. Although many Adherents have strengthened merit-based recruitment by expanding competitive examinations, enhancing transparency, and clarifying qualification standards, OECD Integrity Reviews also reveal that these systems are sometimes circumvented. Heavy reliance on short-term contracts, temporary appointments, or alternative employment regimes can bypass merit safeguards. While such arrangements may offer flexibility, they risk undermining fairness and integrity if inadequately regulated. (OECD, 2019^[11]). To preserve credibility, it is essential that merit principles applied are appropriate to the employment type, supported by transparent procedures and strong monitoring and accountability mechanisms. To reinforce integrity and strengthen public trust, several Adherents complement merit-based systems with measures that promote openness, cooperation, and public participation (Box 11).

Box 11. Protecting meritocracy and non-partisanship in recruitment

Australia strengthened its Merit Protection Commissioner role in 2025, expanding from reviewing individual promotion decisions to examining whether entire selection processes comply with merit principles. The Commissioner now possesses own motion powers to conduct audits of agencies' hiring practices, providing systematic oversight of merit application across the Australian Public Service.

Canada places strong emphasis on protecting meritocracy and non-partisanship in recruitment. Integrity-focused interview questions and managerial observations are used to evaluate candidates' values alongside technical competencies. Independent integrity officers exist in all departments to provide advisory support, while mandatory Codes of Conduct and integrity training are delivered prior to elections to reinforce neutrality and professionalism.

France maintains one of the most established systems of competitive examinations (*concours*) for civil service entry, which are designed to uphold transparency and impartiality. Recent reforms have sought to modernise these processes to assess not only academic knowledge but also soft skills and ethical judgment to address criticisms of elitism and narrow recruitment pools.

Korea has introduced digital recruitment platforms that not only enhance transparency in hiring but also allow citizens to monitor processes and outcomes, thereby reinforcing both trust and accountability.

Sources: (Government of Australia, 2025^[67]; Government of Canada, 2003^[68]; OECD, 2023^[69]; Government of Korea, 2025^[70]).

86. Effective systems require mechanisms to address underperformance, including clear evaluations and structured exit strategies. Many Adherents can dismiss below-average performing public servants, although this procedure is rarely put into practice (OECD, 2025^[59]). Clear criteria, guidelines, and HR support are critical to ensure transparency, fairness, and bias reduction, while enabling managers to meet operational needs. Such practices maintain professionalism and foster public trust. Adherents generally apply standardised performance assessments, serving as multipurpose tools for promotion, demotion and termination, including not only objective criteria for promotion but also structured processes to manage underperformance. Nevertheless, across eight EU Member States, six of which are Adherents, 33% of respondents believe promotions and career development are based on personal connections rather than skills (OECD, 2025^[59]).

87. Merit-based systems also face structural challenges. They are often criticised as slow and inflexible: recent data gathered by the OECD suggest average time to recruit can range from 86 to 299 calendar days, which may result in the best candidate dropping out or opting for the private sector (OECD, 2025^[65]). These obstacles may encourage managers to resort to temporary hiring practices that undermine meritocratic safeguards as noted above. Traditional assessment methods can also fall short in evaluating emerging skillsets, such as digital competencies or cross-sector collaboration. Senior levels of public service frequently lack diversity, reflecting systemic barriers and unconscious bias in promotion practices. Moreover, the growing reliance on contractors and third-party providers makes it harder to enforce consistent application of merit principles. Addressing these challenges requires continuous modernisation to balance integrity and professionalism with efficiency, agility, and inclusiveness in contemporary public administration (OECD, 2020^[5]), a balance that Adherents could consider further strengthening.

88. During the informal consultation on 27 March 2025, several Adherents noted efforts to strengthen meritocratic recruitment and promotion, while also reporting declining public trust and negative perceptions of civil servants, often fuelled by polarising political rhetoric. Data confirm that trust in the civil service is decreasing on average, even though people still tend to trust the civil service more than national government, noting that this pattern is not uniform across OECD countries. In addition, more than 43% of respondents to the 2023 OECD Trust Survey think that a civil servant would accept a bribe to speed up a service, a perception that can negatively affect trust in the civil service (OECD, 2024^[7]). This underlines that a merit-based civil service is an ongoing endeavour requiring constant vigilance. Countries that sustain it most effectively combine strong legal frameworks with independent oversight, continuous modernisation of human resource management methods, and active communication strategies

to reinforce public confidence. They also integrate inclusiveness and citizen participation (see Principle 13), ensuring that meritocracy evolves alongside societal expectations.

89. Clear criteria and guidelines for managers, covering transparency, fairness, bias mitigation, and job profiling, are necessary. However, hiring managers must also be trained, supported by HR professionals, and granted sufficient flexibility to adapt processes to operational needs, including pay adjustments where justified. Such flexibilities should operate within robust oversight frameworks to uphold merit and prevent abuse. Sweden’s decentralised model illustrates this balance: agencies design transparent selection procedures, and managers assess candidates based on documented criteria such as skills, experience, and suitability for the role.

90. Overall, Adherents have made substantial progress in embedding merit-based principles across their civil services in line with Principle 7 (merit) of the 2017 Recommendation, through competitive recruitment, enhanced transparency, and strengthened safeguards to ensure fairness and integrity. Complementary measures such as protecting selection committees from political influence, refining performance evaluations, and promoting openness and participation further reinforce integrity and public trust. Nonetheless, challenges persist, including lengthy recruitment procedures, uneven application of merit principles, and perceptions of favouritism that can erode confidence in public institutions. Sustaining a credible, meritocratic civil service therefore requires continued modernisation, effective oversight, and strategic empowerment of managers. The forthcoming PII dataset on Principle 7, to be released in 2026, will allow Adherents to gain deeper insight into the strengths and weaknesses of merit-based procedures for recruitment, promotion, demotion and termination of service of civil servants and their implementation in practice.

Principle 8: Capacity-building

91. Principle 8 of the 2017 Recommendation calls on Adherents to:

“Provide sufficient information, training, guidance and timely advice for public officials to apply public integrity standards in the workplace, in particular through:

- a) providing public officials throughout their careers with clear and up-to-date information about the organisation’s policies, rules and administrative procedures relevant to maintaining high standards of public integrity;*
- b) offering induction and on-the-job integrity training to public officials throughout their careers in order to raise awareness and develop essential skills for the analysis of ethical dilemmas, and to make public integrity standards applicable and meaningful in their own personal contexts;*
- c) providing easily accessible formal and informal guidance and consultation mechanisms to help public officials apply public integrity standards in their daily work as well as to manage conflict-of-interest situations.”*

92. The 2003 Recommendation also emphasises awareness-raising and capacity building, recommending for Adherents to publish the conflict-of-interest policy, operationalise the policy at organisational level, for example in a code of conduct, provide up-to-date information about the policy, rules and administrative procedures, as well as additional guidance and assistance to officials on the application of the policy. In addition, the Recommendation suggests for Adherents to provide training to enable employees to apply relevant rules.

93. Adherents have made efforts to implement this Principle. Ethics and integrity are commonly cited as priorities in public service **trainings** across OECD Member countries, for both managerial and non-managerial positions (OECD, 2025^[65]). Adherents have implemented various capacity-building initiatives to enhance public sector integrity, including mandatory training focusing on equipping officials with the knowledge and tools necessary to uphold ethical standards and integrity. These initiatives target different levels of public officials, from new recruits to senior management, and can include specialised training for high-risk groups or functions. Increasingly, governments make such standards, guidance, and training materials publicly available through official websites or

internal staff portals. These are often supplemented with targeted training sessions and advisory support to ensure effective implementation and continuous learning.

94. Training content typically covers areas such as codes of conduct, conflict-of-interest management, protection of whistleblowers, lobbying transparency, and corruption risk assessment. A growing number of Adherents also use interactive e-learning modules that combine theoretical content with videos, quizzes, scenario-based exercises, and reflective tasks, enabling participants to actively engage with the material and apply lessons to real-world situations. In addition, guidelines, toolkits, and handbooks are widely employed to provide structured frameworks for implementing integrity standards—whether general principles, such as rules on conflicts of interest and gifts, or area-specific procedures, including complaint handling, whistleblower management, and pre- or post-public employment processes (OECD, 2025^[71]; Government of Slovakia, 2022^[72]; CBA, 2025^[73]).

95. However, OECD Integrity Reviews show that training is often *ad hoc*, limited to new recruits, or inconsistent across departments and levels, reducing long-term impact (OECD, 2019^[11]). Challenges include sustaining engagement, embedding ethics in daily work, securing leadership participation, and addressing emerging issues and complex dilemmas. Training could incorporate diverse content, formats, and interactive approaches to increase relevance, engagement, and effectiveness, hence further improving the consistency and resilience of integrity frameworks.

96. Several Adherents have also established mechanisms for providing **confidential advice** on ethical dilemmas, supported by trained counsellors or integrity officers (OECD, 2019^[11]; OECD, 2017^[74]). By clearly institutionalising such integrity contact points, allocating them sufficient human and financial resources and ensuring that other staff are aware of their presence, these actors stand to play a key role in fostering a culture of integrity. Good practices from across the OECD show that the mandate of an integrity contact point typically includes both preventative and reactive anti-corruption responsibilities, but no investigative powers. Their responsibilities include activities related to mainstreaming integrity through their organisations, advising on ethics and integrity issues, and helping to manage corruption risks within their organisations. As identified focal points in the workplace, integrity contact points are also able to facilitate co-ordination of integrity and transparency policies with other organisations and jointly with other integrity actors (OECD, 2020^[5]). Many Adherents have developed mechanisms to operationalise their capacity building, including by co-ordinating networks of integrity contact points across public institutions (Box 12).

Box 12. Institutionalising capacity building on integrity matters

Austria's Integrity Network

In Austria, the Federal Bureau to Prevent and Fight corruption (BAK) created the Austrian Integrity Network to strengthen integrity by anchoring integrity as a fundamental element in public sector. To this end, the BAK trains civil servants to become experts in the field of integrity and corruption prevention within the framework of the Integrity Network. The foundational training for integrity officers lasts one week and includes the following training content: the phenomenon of corruption, corruption prevention and risk management, criminal law, public service and organisational law, as well as compliance and integrity management in public administration. Drawing on their training, the integrity officers are then equipped to offer advice and guidance within their entities to reinforce integrity. Moreover, the BAK establishes, operates, and administers an online platform for the network, which provides additional information on topics such as compliance, corruption, ethics, integrity, and organisational culture. BAK also offers regular follow-up meetings for integrity officers on specific topics such as risk management and ethics and values.

Belgium's Federal Network of Integrity Co-ordinators

The Federal Network of Integrity Co-ordinators (FNIC), co-ordinated by the Federal Integrity Bureau, supports implementation of integrity policies and facilitates knowledge-sharing across the federal public service. The FNIC holds four official meetings every year as well as additional unofficial online meetings to allow for the exchange

of information and good practices among the integrity Co-ordinators. Integrity Co-ordinators serve as the focal points for integrity management at organisational level, providing information, guidance and advice on integrity standards to encourage compliance with relevant laws and regulations and foster a culture of integrity in their organisations.

Poland’s Network of Ethics Advisors

The Civil Service Department in the Chancellery of the Prime Minister co-ordinates a network of ethics advisors across 68 civil service institutions. Created in 2017, the network provides a networking opportunity for ethics advisors and a forum for the exchange of information, knowledge, experience and good practices at central level and among regional offices across the country. The network co-operates on a continuous basis through regular semi-annual meetings, *ad hoc* online consultations, and a dedicated digital collaboration platform, as well as capacity building activities such as workshops and meetings with experts in fields such as psychology, mediation, disciplinary proceedings, and soft skills. Members of the network participate in *ad hoc* working groups supporting the Head of the Civil Service in the preparation of soft law instruments to promote and build a culture of integrity in the civil service, or to solve ethical dilemmas.

Source: (Austrian Integrity Officer Network, 2024^[75]; Government of Belgium, 2023^[76]; Government of Poland, 2017^[77]); information provided by the Civil Service Department in the Chancellery of the Prime Minister, Poland.

97. Adherents have made efforts to implement Principle 8 (capacity building) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation, while more could be done to provide sufficient information, training, guidance and timely advice for public officials to apply public integrity standards in the workplace. This includes developing and implementing integrity training for different groups of officials and establishing mechanisms for providing confidential advice on ethical dilemmas, supported by integrity contact points that benefit from capacity-building and knowledge sharing through specialised networks. At the same time, there is room to further improve capacity building, for example, through longer-term and consistent training opportunities for all levels of public officials.

Principle 9: Openness

98. Principle 9 of the 2017 Recommendation calls on Adherents to:

“Support an open organisational culture within the public sector responsive to integrity concerns, in particular through:

- a) encouraging an open culture where ethical dilemmas, public integrity concerns, and errors can be discussed freely, and where appropriate, with employee representatives, and where leadership is responsive and committed to providing timely advice and resolving relevant issues;*
- b) providing clear rules and procedures for reporting suspected violations of integrity standards, and ensure, in accordance with fundamental principles of domestic law, protection in law and practice against all types of unjustified treatments as a result of reporting in good faith and on reasonable grounds;*
- c) providing alternative channels for reporting suspected violations of integrity standards, including when appropriate the possibility of confidentially reporting to a body with the mandate and capacity to conduct an independent investigation.”*

99. Similarly, the 2003 Recommendation suggests for Adherents to develop an open organisational culture where conflicts of interest can be freely raised and discussed, by involving employees in the review of existing

conflict-of-interest policy, consulting them on envisaged prevention measures, providing training to enable employees to apply relevant rules and providing support to managers handling conflicts.

100. Adherents have increasingly adopted both informal and formal mechanisms to foster an open culture and facilitate reporting of integrity concerns. However, intrinsic cultural issues, such as hierarchical and bureaucratic environments, limit the effective implementation of this Principle. Promoting **openness** is particularly challenging in hierarchical sectors, such as defence or law enforcement, where informal networks or a “code of silence” can inhibit speaking up. Establishing a culture where concerns can be raised early, before they escalate into operational failures or criminal conduct, is critical. Law enforcement, which often serves as the primary or ultimate channel for external complaints and whistleblower reports, should also act as a role model by demonstrating how the open culture should be built internally. The Council of Europe’s Group of States against Corruption (GRECO), whose membership includes 28 Adherents, has observed that whistleblower protections are difficult to implement in such institutions, and that overcoming this culture requires not only legislation but observable behavioural change (GRECO, 2025^[78]). On the other hand, there is an emerging trend among Adherents to treat errors and failures as opportunities for organisational learning in public administration in general and more tight-knit communities like law enforcement in particular (Box 13). These practices, however, remain uneven indicating the need for broader and more consistent adoption.

Box 13. From errors to insights: building a culture of integrity through learning

United Kingdom

Since 2020, the Metropolitan Police Service has applied a Reflective Practice approach to address minor conduct or performance issues in relation to the Code of Ethics outside formal disciplinary procedures. The framework allows officers to address “Practice Requiring Improvement” without formal disciplinary action, emphasising learning and development over punishment. According to the Home Office Statutory Guidance on Professional Standards, Performance, and Integrity in Policing, the Reflective Practice Review Process shifts the focus from blame to resolution and learning. It provides officers with opportunities to reflect on their actions, identify areas for improvement, and fosters a culture of openness and continuous professional development.

Norway

The Norwegian Parliament amended the Working Environment Act, effective 1 January 2020, to explicitly promote a workplace culture characterised by openness and free expression, recognising its fundamental importance for the effective reporting and handling of misconduct. The amendment reflects the understanding that the climate for expression within an organisation is often decisive for whether employees choose to report concerns and how such reports are subsequently managed. To support the implementation of these changes and strengthen a culture of openness, the Norwegian Labour Inspection Authority carried out a series of awareness-raising initiatives, including information campaigns, training films, and guidance materials, aimed at ensuring that reports of censurable conditions are made safely, appropriately, and in accordance with the new whistleblowing regulations introduced under the Act.

Poland

As part of the Head of the Civil Service’s Recommendation on promoting a culture of integrity, Directors General and heads of offices are encouraged to conduct regular, fully anonymous self-assessments of their organisation’s integrity culture. The objective is to deepen leadership’s understanding of how ethics are perceived by employees, identify areas for improvement, and adjust integrity strategies accordingly, while tracking the effectiveness of measures over time. A model questionnaire, data analysis template and good practice examples are available on the Civil Service Portal to facilitate implementation. The process emphasises engagement, including sharing results with civil servants and consulting them on follow-up actions.

Sources: (Government of Norway, 2020^[79]; Government of the United Kingdom, 2020^[80]); information provided by the Civil Service Department in the Chancellery of the Prime Minister, Poland

101. Some Adherents have introduced participatory initiatives, including joint storytelling, staff surveys, recognition of innovative practices, and safe spaces for raising concerns, alongside mandatory training for leaders on feedback, conflict management, and difficult conversations. This “open error culture” is increasingly recognised as a resource for learning and improvement rather than a disadvantage (OECD, 2020^[81]; OECD, 2020^[5]). Despite these advances, an open culture in which ethical dilemmas, integrity concerns, and errors can be freely discussed remains the exception rather than the norm. Adherents could therefore focus on establishing a baseline of openness that is sensitive to traditions and national contexts.

102. When openness alone is insufficient, Principle 9 recommends that Adherents provide clear procedures for reporting suspected violations of integrity standards and ensure protection against reprisals. Most Adherents have established multiple reporting mechanisms, internally and externally, involving integrity contact points, dedicated bodies, or independent oversight institutions. Many have also enacted legislative frameworks for whistleblower protection, including 34 with dedicated laws in this area. The introduction of Directive 2019/1937 (EU) on Whistleblower Protection has helped considerably strengthen these frameworks across EU Member States, including 24 Adherents.

103. Nevertheless, OECD Integrity Reviews indicate persistent gaps in whistleblowing systems, including legal clarity, robust safeguards, and cultural acceptance of whistleblowers (OECD, 2021^[82]) (OECD, 2019^[11]; OECD, 2022^[10]). Challenges include clearly distinguishing whistleblowers from witnesses in law, guaranteeing safeguards against retaliation, and expanding secure, anonymous reporting channels, especially in high-risk environments. While some Adherents use encrypted platforms to ensure anonymity, others do not accept anonymous reports. The European Commission’s 2024 report on the implementation of the EU Whistleblowing Directive also highlights persistent challenges across the EU Member States. Many failed to meet the 2021 transposition deadline or implemented the Directive only partially or in a restrictive manner. The Commission identified major shortcomings in the scope, conditions for protection, and safeguards against retaliation (European Commission, 2024^[83]).

104. The primary motivators for individuals to speak up are the assurance that their reports will be acted upon and the understanding that their actions can lead to positive changes (OECD, 2024^[84]). Achieving this requires not only robust legislative and procedural safeguards, but also continuous improvement, where findings and reports inform ongoing updates to policies and processes. For example, in Australia, the Queensland Ombudsman’s Casebook 2025 publishes summaries of complaints and resulting recommendations on safety, administrative fairness, and decision-making, supporting public sector agencies in reforming policies and procedures (Queensland Ombudsman, 2025^[85]).

105. Hence more systematic analysis of whistleblower reports, supported by centralised data collection on cases, trends, and outcomes, could enhance prevention and provide evidence that disclosures lead to meaningful change (OECD, 2022^[10]). Efforts to monitor and evaluate the purpose, implementation, and effectiveness of whistleblower frameworks could further strengthen these systems, as further discussed under Principle 11 (Enforcement).

106. Overall, there is a significant room for improvement in the implementation of Principle 9 (openness) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation. While some efforts have been made by Adherents, many do not yet have a fully open culture where ethical dilemmas, public integrity concerns, and errors can be discussed freely. Adherents could continue strengthening legal clarity, cultural acceptance of whistleblowers and their effective protection against reprisals. Systematic monitoring of reporting mechanisms is also essential to ensure that disclosures lead to meaningful organisational improvements.

Pillar III: Accountability

107. Pillar III of the 2017 Recommendation recommends that Adherents enable effective accountability. The pillar is structured around four principles that set out the efforts needed to achieve this goal: risk management (Principle 10), enforcement (Principle 11), oversight (Principle 12) and participation (Principle 13). In comparison, the 2003 Recommendation adopts a narrower approach to accountability, with a focus on the enforcement of conflict-of-interest policy.

Principle 10: Risk management

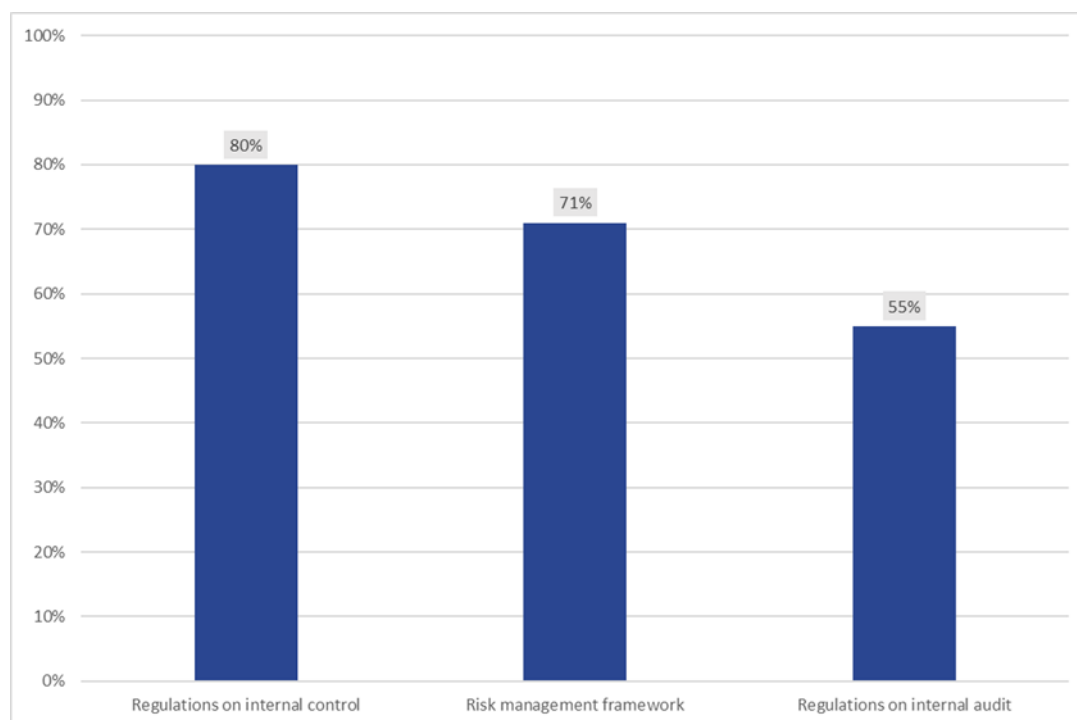
108. Principle 10 of the 2017 Recommendation calls on Adherents to:

“Apply an internal control and risk management framework to safeguard integrity in public sector organisations, in particular through:

- a) ensuring a control environment with clear objectives that demonstrate managers’ commitment to public integrity and public-service values, and that provides a reasonable level of assurance of an organisation’s efficiency, performance and compliance with laws and practices;*
- b) ensuring a strategic approach to risk management that includes assessing risks to public integrity, addressing control weaknesses (including building warning signals into critical processes) as well as establishing an efficient monitoring and quality assurance mechanism for the risk management system;*
- c) ensuring control mechanisms are coherent and include clear procedures for responding to credible suspicions of violations of laws and regulations, and facilitating reporting to the competent authorities without fear of reprisal.”*

109. While the 2003 Recommendation does not consider the role of the broader control and risk management framework, it does emphasise the importance of reviewing at-risk areas for potential conflict-of-interest situations, such as additional employment, contracts or gifts and gratuities, to name just a few.

110. In terms of **ensuring a control environment with clear objectives**, Adherents generally have strong regulatory frameworks on risk management and internal control in place, whereas regulations on internal audit are less developed. According to the PIIs, regulations on risk management and internal control are strong, with PII Respondents on average having 71% and 80% of the elements of standard regulations, respectively (Figure 9). On the other hand, on average PII Respondents only have 55% of standard regulations on internal audit in place, highlighting this as an area for further improvement (OECD, 2025; 2026^[6]) (OECD, 2024^[1]). In addition, regulations address fraud and corruption risks in most cases. 70% of PII Respondents have issued guidelines on fraud and corruption prevention as part of their internal control systems, and 71% of PII Respondents explicitly address these risks in their risk management framework (OECD, 2024^[1]) (OECD, 2025; 2026^[6]).

Figure 9. Regulations on internal audit fall behind internal control and risk management

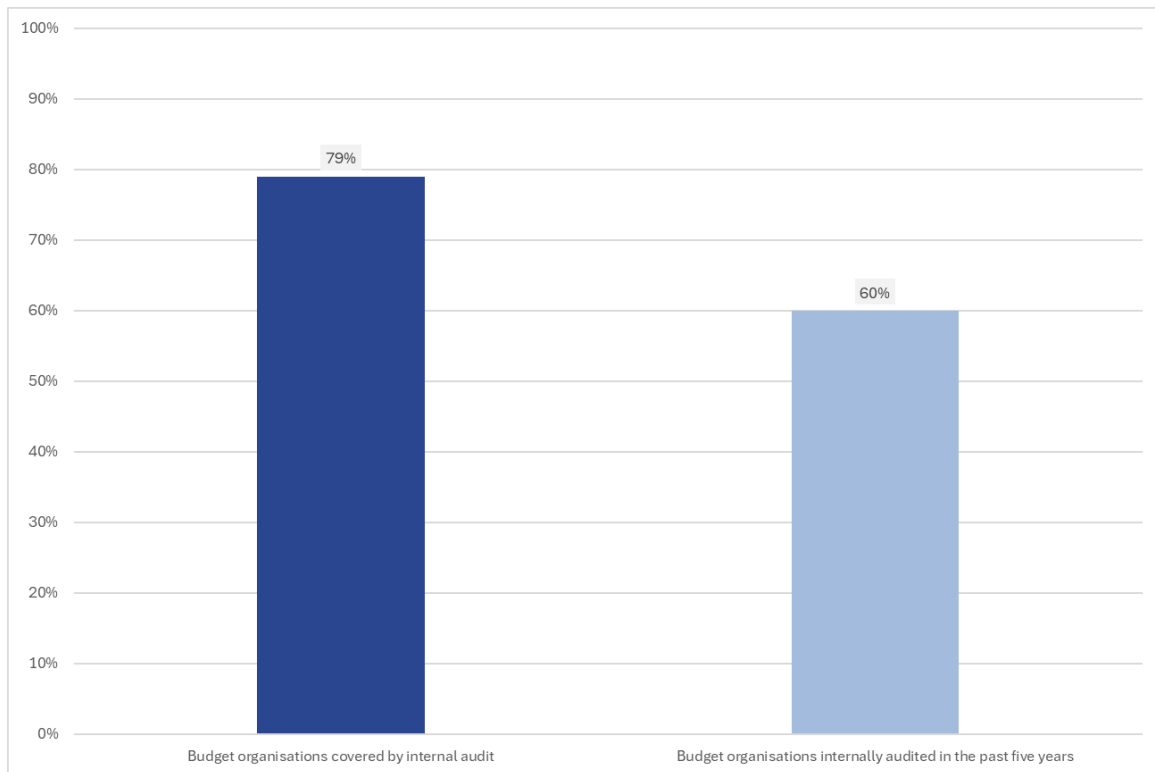
Note: Percentage of Respondents having fulfilled the standard criteria on regulation for internal audit, risk management and internal control. How to read: While 80% of Respondents have enacted regulation regarding internal control, only 55% of them have done so for internal audit.

Source: OECD Public Integrity Indicators Database (accessed 1 December 2025)

111. However, despite strong regulations, the effectiveness of risk management and internal control processes could be improved in practice, benefitting from the evolution of digital transformation and the use of artificial intelligence. Regulations adopted at the central government level are not consistently applied in line ministries and agencies where corruption prevention happens. Only 6 PII Respondents have all line ministries or agencies perform a risk assessment in the past three years. This is perhaps to be expected, since only 7 PII Respondents have roles and responsibilities for risk management established in line ministries or agencies (OECD, 2024_[1]).

112. Other risk management and audit good practices have also not been implemented in all central government bodies in most Adherents. For example, only seven PII Respondents can evidence that at least half of these bodies had planned internal audits related to fraud and corruption. Moreover, while an audit charter forms the foundation of effective internal audit in an organisation, such charter was in place in all ministries or agencies in just 12 PII Respondents. In addition, only 9 Respondents had conducted an external quality assurance of all internal audit units in the past five years (OECD, 2025; 2026_[6]; OECD, 2024_[1]). 79% of Respondents extend the coverage of internal audit to all budget organisations, whereas only 60% audit all these organisations in practice (Figure 10). While there is an implementation gap for those Respondents that collect the necessary data, yet again, many do not effectively monitor implementation. As stated previously, such monitoring is itself an important part of implementation, as it helps ensure that policies and processes - in this case for internal audit - are effective.

Figure 10. Coverage of national budget organisations by internal audit versus implementation



Note: Coverage of national budget organisations by internal audit on average across PII Respondents. How to read: On average, 79% of national budget organisations across Respondents are covered by internal audit. However, only an average of 60% of these organisations have been audited in the past 5 years.

Source: OECD Public Integrity Indicators Database (accessed 1 December 2025)

113. Finally, the value of internal audit units ultimately rests on public sector managers acting upon the auditors' recommendations and implementing suggested changes or considering them and finding a valid reason not to. In PII Respondents where it is monitored centrally, implementation of audit recommendations is relatively high (74%). This is a positive sign, as it suggests that management is willing to act on the recommendations of internal auditors in most cases. However, around half of PII Respondents do not collect central data on implementation of audit recommendations and therefore are unaware of the implementation status. This stands to undermine the impact of internal audit in those countries.

114. Moreover, having a central function for internal control and internal audit is a key element to **ensure control mechanisms are coherent and include clear procedures**. By ensuring consistency, quality, and alignment with international good practices, central harmonisation units or functions strengthen the overall integrity of control systems. They also play a capacity-building role, for example, by issuing methodological guidance, providing training, and supporting risk management and anti-corruption measures (OECD, 2020^[5]). Many Adherents have a central function in place, but institutional set-ups vary, reflecting differences in administrative traditions, governance structures, and levels of centralisation (Box 14). Just over half of PII Respondents (53%) have a central function that develops both the internal control and internal audit systems, while others, such as Switzerland and Türkiye, have dedicated central functions for the internal control and the internal audit systems. Where PII Respondents have a central function in place, these units consistently promote methodologies for internal control and internal audit in line with international standards. However, not all central functions have conducted reviews of internal control and internal audit systems annually (OECD, 2025; 2026^[6]), which is key to ensure their continued efficiency and effectiveness.

Box 14. Different institutional set-ups for Central Harmonisation Units (CHUs) or functions exist across Adherents

Mexico

Mexico's Ministry of Public Administration serves as the central harmonisation unit. It issues regulations, monitors compliance, supports internal control bodies, and coordinates audits, while promoting methodologies aligned with international standards. Recent guidance, including the 2021 Methodology for the Evaluation of Government Administration, ensures integrity and corruption risks are explicitly integrated into risk management practices.

Ireland

The Government Accounting Unit of the Department of Public Expenditure, Delivery and Reform, serves as the central function for internal control publishing guidance such as the Public Financial Procedures, Risk Management Guidance, and Internal Audit Standards for Government Departments and Offices. No equivalent central function exists for internal audit.

Portugal

In Portugal, responsibility for developing and harmonising IC and IA systems is shared among several bodies through the Coordinating Council of the Internal Control System (CC SCI). The CC SCI, composed of inspector generals, the Director-General of the Budget, the head of the Institute of Financial Management of Social Security, and other sectoral control bodies, operates under the Ministry of Finance and is chaired by the Inspector General of Finance. Its tasks include preparing annual internal control plans and reports, issuing opinions on laws and activity plans, and setting norms and methodologies, which extend to internal audit through its oversight of inspectorates general.

Source: OECD Public Integrity Indicators Database (accessed 30 September 2025); (Government of Ireland, 2025^[86]) (Government of Portugal, 1998^[87])

115. To conclude on the implementation of Principle 10 (risk management) of the 2017 Recommendation, risk management and internal control frameworks are well established. However, several challenges remain when it comes to ensuring the effectiveness of these frameworks to safeguard integrity in public sector organisations. Notably, implementation of risk management and internal control is lagging, monitoring and follow-up are often weak and internal audit remains underdeveloped. Without a central function to provide guidance, ensure consistency, and collect data on performance, internal control and audit frameworks will remain unevenly applied. Strengthening oversight and establishing clear responsibility for supporting line ministries and reporting on implementation, is essential to closing the gap between regulations on paper and their effectiveness in practice.

Principle 11: Enforcement

116. Principle 11 of the 2017 Recommendation recommends for Adherents to:

“Ensure that enforcement mechanisms provide appropriate responses to all suspected violations of public integrity standards by public officials and all others involved in the violations, in particular through:

- a) *applying fairness, objectivity and timeliness in the enforcement of public integrity standards (including detecting, investigating, sanctioning and appeal) through the disciplinary, administrative, civil, and/or criminal process;*

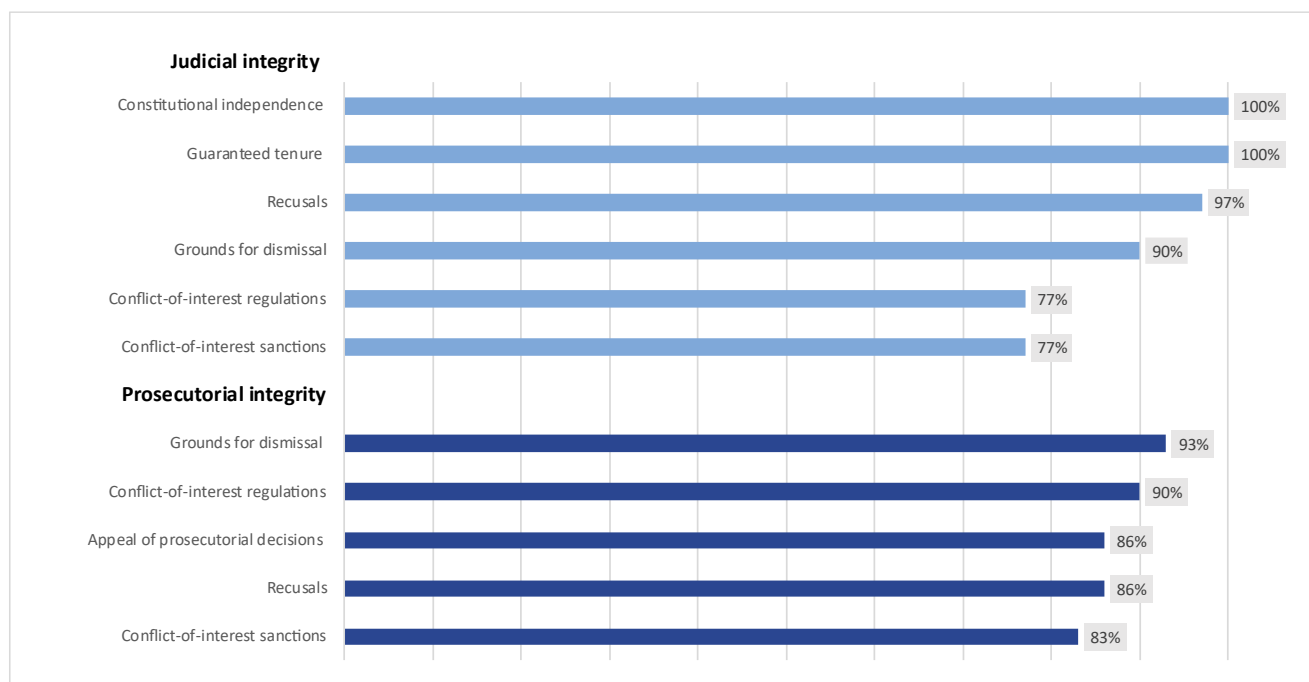
- b) *promoting mechanisms for co-operation and exchange of information between the relevant bodies, units and officials (at the organisational, subnational or national level) to avoid overlap and gaps, and to increase the timeliness and proportionality of enforcement mechanisms;*
- c) *encouraging transparency within public sector organisations and to the public about the effectiveness of the enforcement mechanisms and the outcomes of cases, in particular through developing relevant statistical data on cases, while respecting confidentiality and other relevant legal provisions.”*

117. Similarly, the 2003 Recommendation emphasises the importance of the enforcement of conflict-of-interest policy; through the development of procedures for establishing breaches and proportionate consequences; mechanisms for monitoring compliance; and the integration of prevention and enforcement measures in a coherent institutional framework. As more broadly explained under Principle 4 (standards), Adherents have largely aligned with the 2003 Recommendation by establishing conflict-of-interest legal frameworks and interest disclosure mechanisms. However, implementation and enforcement in practice, such as verifying disclosures and resolving conflicts consistently, remain areas where many Adherents need to strengthen capacity and monitoring to fully meet the Recommendation’s objectives.

118. With regard Principle 11, Adherents have recognised that **fairness, objectivity and timeliness** are at the heart of enforcing public integrity standards. These principles help build confidence in the system, strengthen its legitimacy over time, and encourage integrity to become part of everyday culture . Perceived judicial independence is critical, as it signals whether judicial independence and integrity are effectively upheld in practice and shapes public assessments of the credibility of enforcement outcomes. Fairness and objectivity in judicial decision-making depend on judicial independence and integrity, which sustain trust in the justice system. Across the OECD, 54% of people have high or moderately high trust in the judicial system on average (OECD, 2024^[7]). The average score amongst Adherents for freedom from improper government influence in the criminal system is at 0.69 points on a scale of 0 to 1, with significant variations across countries (World Justice Project, 2025^[88]).

119. Adherents have basic safeguards in place for judicial and prosecutorial integrity, supported through human resource policies for selection, appointment, promotion, and dismissal; defined disciplinary procedures; protection against transfer without consent; and transparent case allocation mechanisms (Figure 1111). On average, PII Respondents fulfil 67% of criteria for regulations on judicial integrity and 66% on prosecutorial integrity (OECD, 2025; 2026^[6]). Typically, PII Respondents have established:

- Constitutional safeguards for the independence of judges
- Objective grounds for the dismissal of judges and prosecutors
- Guaranteed tenure for judges until mandatory retirement age, the expiry of their term of office or dismissal from office
- Circumstances and relationships that can lead to conflict-of-interest situations for judges and prosecutors outside public office, as well as sanctions for breaches of conflict-of-interest obligations depending on the severity of the violation
- Circumstances where judges and prosecutors should recuse themselves, as well as procedures for deciding whether they should continue on the case or how the procedural conflict of interest should be resolved
- Appeals against prosecutorial decisions regarding criminal investigations and against decisions to prosecute or not prosecute.

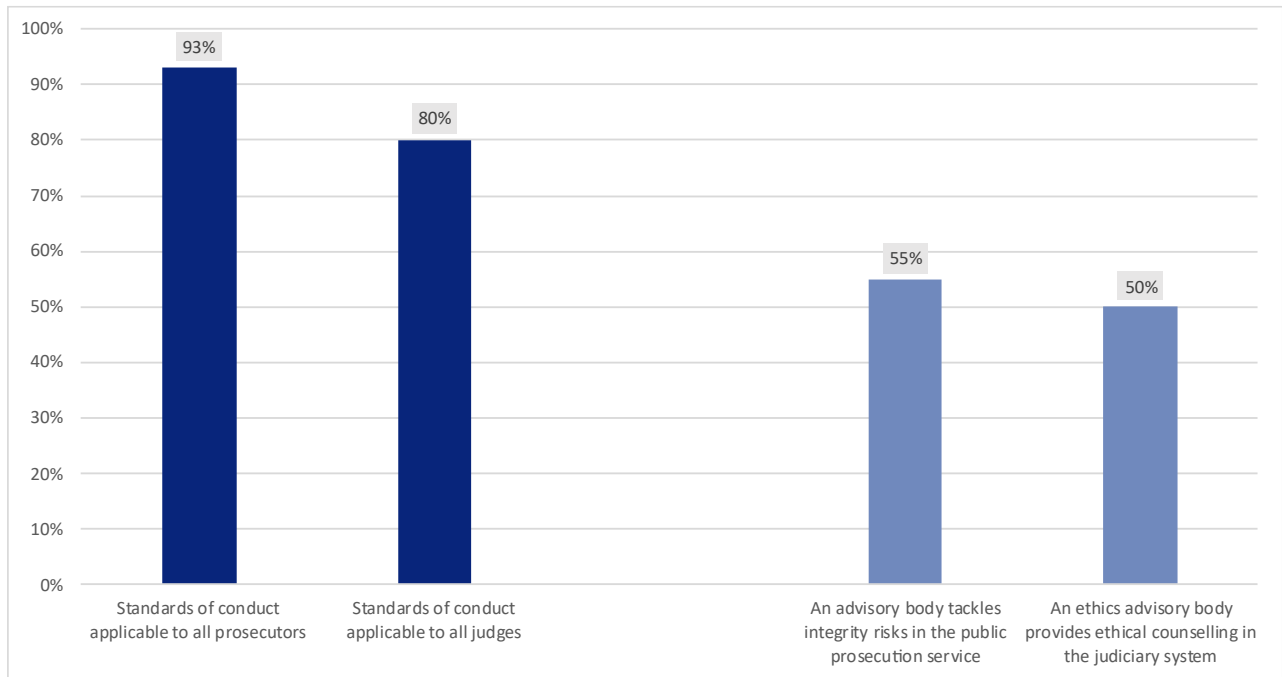
Figure 11. Key strengths in regulations for judicial and prosecutorial integrity

Note: Percentage of PII Respondents fulfilling criteria for regulations on judicial and prosecutorial integrity. How to read: In 100% of PII Respondents, the law establishes guaranteed tenure for judges until mandatory retirement age, the expiry of their term of office or dismissal from office.

Source: OECD Public Integrity Indicators Database (accessed 10 March 2026)

120. Moreover, many Adherents have recognised the importance of merit-based selection, appointment and promotion as a key lever for ensuring judicial and prosecutorial integrity. 70% of PII Respondents have laws establishing objective procedures for the selection and promotion of judges, compared with 48% for prosecutors. To further promote integrity in the judiciary and prosecution, many Adherents have established interest disclosure requirements and standards of conduct and ethical behaviour for judges and prosecutors, but there is significant room to improve support for and monitoring of compliance. A majority of PII Respondents have interest disclosure requirements in place for senior and national judges (60%) and prosecutors (62%). However, compliance with disclosure requirements is low compared to other categories of public officials, especially amongst senior judges (33%). Similarly, only 10% of PII Respondents verify at least 60% of declarations submitted by judges. While 80% of PII Respondents have standards of conduct for judges in place and 93% have such standards for prosecutors, only around half of PII Respondents also have ethics advisory bodies for judges (50%) and prosecutors (55%) to support their application (Figure 12) (OECD, 2025; 2026^[6]; OECD, Forthcoming^[17]).

Figure 12. Ethics advisory bodies to support the application of standards of conduct for judges and prosecutors are lacking



Note: Percentage of PII Respondents that have standards of conduct applicable to all judges and prosecutors and percentage of PII Respondents having an ethics advisory body. How to read: 93% of PII Respondents have standards of conduct applicable to all prosecutors, whereas in only 55% an advisory body is operational within the public prosecution service with the responsibility to prevent and manage integrity risks related to potential conflicts of interest, violations of ethical and moral norms, gift policies and arbitrary decision making.

Source: OECD Public Integrity Indicators Database (accessed 10 March 2026)

121. Many Adherents have established whistleblowing mechanisms for reporting cases of judicial and prosecutorial misconduct. 60% of PII Respondents require the establishment of internal reporting channels in the judiciary and 72% of PII Respondents have such requirements for public prosecutors' offices, noting that the operationalization of reporting channels could be strengthened. There is also room to strengthen awareness of reporting procedures and protections for reporting judicial misconduct, with 40% of PII Respondents on average maintaining government portals providing relevant information. Finally, even though the effectiveness of reporting mechanisms significantly depends on the capacity of staff handling reports, including to ensure confidentiality, training opportunities are close to non-existent. Only 10% percent of staff handling reports in courts and 28% of relevant staff in public prosecutors' offices undergo mandatory training on confidentiality (OECD, 2025; 2026^[6]).

122. With respect to the objectivity and fairness of disciplinary processes, which are key mechanisms through which governments ensure compliance with integrity standards and deter misconduct, 72% of PII Respondents have established a statute of limitations, and in 84% of PII Respondents regulations also establish the right to appeal a disciplinary decision before a judicial body (OECD, 2025; 2026^[6]). Notwithstanding these arrangements, many PII Respondents could strengthen procedural guarantees in disciplinary proceedings, including the presumption of innocence, the right to access and challenge evidence, the right to a hearing prior to a decision, and the right to legal counsel, with 59% providing such guarantees. Half of PII Respondents (50%) do not require that officials or units responsible for disciplinary investigations, decisions, and appeals be distinct from one another. Applying such due process guarantees, which are already commonplace in the criminal system, could help protect the individual and the integrity of the institutions in disciplinary proceedings. Similarly, Adherents could strengthen the disciplinary system by investing in training for staff handling investigations, which is currently offered by only 41% of PII Respondents (OECD, Forthcoming^[17]) (OECD, 2025; 2026^[6]). Standardised training would help ensure consistent application of

disciplinary rules across institutions, addressing challenges posed by largely in-house procedures that currently lack uniformity.

123. Principle 11 of the 2017 Recommendation also recognises that the **oversight, information sharing and co-ordination** among procedures, actors and institutions are essential for effective, timely and proportionate enforcement. They help identify bottlenecks, ensure continuous exchange of experiences, and allow discussion of formal or informal means to improve enforcement as a whole (OECD, 2020^[5]). For disciplinary proceedings, 78% of PII Respondents oblige staff in charge of investigating cases to notify law enforcement if a disciplinary case involves suspected criminality. Some Adherents have disciplinary boards or similar bodies that support information-sharing, co-ordination and practical guidance in handling cases. Other mechanisms, such as inter-agency agreements, memoranda of understanding, joint instructions, networks of co-operation, or secondment programmes are also used to foster co-operation with and among law enforcement authorities (OECD, 2020^[89]). While many Adherents have made progress in strengthening these mechanisms, further action is needed to ensure more consistent co-ordination, standardised information sharing, and effective implementation across institutions.

124. Adherents could further enhance enforcement by expanding the use of electronic case management systems, which provide a shared platform to streamline responsibility assignment, track referrals, coordinate actions across all levels, improve timeliness through automated workflows and alerts, and support monitoring by identifying gaps, overlaps, or bottlenecks to guide improvement. Some Adherents, such as Estonia, have established comprehensive systems that allow for the management of cases across criminal, civil and administrative systems (Box 15). Beyond improving efficiency and facilitating co-operation, the use of electronic case management systems allows Adherents to better leverage the data collected through these systems to gain insights into key risk areas, as well as for monitoring and evaluating the effectiveness of the broader integrity enforcement regime (OECD, 2020^[89]).

Box 15. Estonia's E-File system

The E-File is a central information system that provides an overview of the different phases of criminal, civil, administrative and misdemeanour proceedings, procedural acts and court adjudications to all the parties involved, including the citizen and their representatives. It is an integrated system for proceedings enabling the simultaneous exchange of information between different parties.

The system requires electronic communication between all parties and restricts access to authorised systems and users with sufficient rights. It enables a completely digital workflow for all the parties to the proceeding process and provides precise statistics in the legal protection field.

Source: (Centre for Registers and Information Systems, 2026^[90])

125. Finally, Adherents could make further efforts to foster **transparency** both within public sector organisations and toward the public about the effectiveness of the enforcement mechanisms and the outcomes of cases. Currently, 63% of PII Respondents publish data on all final decisions by administrative courts and 53% do the same for all final decisions of criminal courts. Beyond the final results of enforcement processes, however, the availability of data on different types of cases and sanctions, as well as on the different stages of enforcement processes are not consistently available, thus inhibiting transparency and accountability, as well as a more nuanced understanding of the effectiveness of the enforcement system.

126. The lack of public data is particularly pronounced for disciplinary procedures. None of the PII Respondents make data on the number of initiated, concluded, or appealed disciplinary procedures against civil servants publicly available (OECD, 2025; 2026^[6]), highlighting this as an area for considerable improvement. The lack of public data on disciplinary procedures may in part be explained by the absence of electronic case management systems, as well as the often-decentralised nature of disciplinary enforcement systems, where various institutional actors may be in charge of compiling data and statistics. Better use of digital tools, including electronic case management, as well as

central co-ordination of the disciplinary system can help improve the availability and accessibility of disciplinary data and statistics, in consideration of data protection and investigative confidentiality, allowing for identification of risk areas and irregularities that would require further preventive efforts or investigations (OECD, 2020^[89]).

127. Data and statistics around enforcement can also provide a valuable source in the conduct of broader performance assessments of enforcement systems. Publishing the results of these assessments demonstrates commitment to accountability and instils trust in these systems. Finally, in an effort to enhance transparency, accountability and openness, some Adherents have invested in building relationships between enforcement authorities and the media, designating judicial spokespersons or press judges, or developing communications strategies (OECD, 2020^[5]).

128. Overall, Adherents have made progress in implementing Principle 11 (enforcement) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation, even though scope for improvement remains. They have established frameworks to strengthen the enforcement of public integrity standards, by putting in place legal and institutional frameworks that support fairness, objectivity, and timeliness, notably through basic safeguards for the organisational and individual independence of the judiciary and the integrity of prosecutors. Nonetheless, procedures to ensure merit in the selection, appointment and promotion of prosecutors should be strengthened, the implementation of standards of conduct and verification of interest declarations of judges improved and the implementation of whistleblowing frameworks strengthened. Likewise, there remains scope to strengthen procedural fairness and objectivity guarantees in disciplinary procedures and to ensure their consistent application. Adherents could continue to enhance oversight, information sharing and coordination, notably through greater use of electronic case management systems, to support timely and proportionate enforcement and improved monitoring. Finally, making data on disciplinary procedures publicly available and communicating the results clearly can further strengthen transparency, enhance accountability, and support the ongoing improvement of enforcement systems.

Principle 12: Oversight

129. Principle 12 of the 2017 Recommendation states that Adherents should:

Reinforce the role of external oversight and control within the public integrity system, in particular through:

- a) facilitating organisational learning and demonstrating accountability of public sector organisations by providing adequate responses (including redress, where relevant) to the sanctions, rulings and formal advice by oversight bodies (such as supreme audit institutions, ombudsmen or information commissions), regulatory enforcement agencies and administrative courts;*
- b) ensuring that oversight bodies, regulatory enforcement agencies and administrative courts that reinforce public integrity are responsive to information on suspected wrongdoings or misconduct received from third parties (such as complaints or allegations submitted by businesses, employees and other individuals);*
- c) ensuring the impartial enforcement of laws and regulations (which may apply to public and private organisations, and individuals) by regulatory enforcement agencies.”*

130. The 2003 Recommendation also emphasises the need for external oversight institutions to work together to detect breaches of conflict-of-interest standards, as well as the role that the appropriate reporting and publication of these reports can play in encouraging compliance with policy and discouraging abuse of the integrity-management process.

131. In line with the requirement to reinforce the role of external oversight and control within the public integrity system, Adherents have taken steps to strengthen three core areas of action: (1) fostering adequate responses by public

sector organisations to oversight bodies' advice; (2) strengthening effective complaint and allegation handling; and (3) ensuring impartial enforcement of laws and regulations by regulatory enforcement agencies. These measures aim to promote organisational learning, enhance accountability, and ensure integrity in the exercise of public authority. While progress has been made, challenges remain in ensuring full implementation of oversight recommendations, strengthening responsiveness to citizens' complaints, and maintaining the independence and impartiality of enforcement bodies.

132. With regard to the first line of action, **fostering response to oversight bodies' advice**, Adherents have increasingly recognised the importance of ensuring that oversight bodies' rulings, recommendations and formal advice translate into institutional learning and policy improvement. Supreme Audit Institutions (SAI), ombudsmen, and information commissions play a central role in this process by identifying weaknesses in public governance and providing recommendations for corrective measures. Several Adherents have established structured mechanisms to monitor and follow up on these recommendations (Box 16). In some of them, ministries are required to respond formally to the SAI and outline corrective measures to Parliament within defined deadlines. This systematic response process reinforces accountability and creates a feedback loop between audit findings and administrative action.

Box 16. Monitoring the implementation of external audit recommendations

United Kingdom: Recommendations Tracker of the National Audit Office

The National Audit Office (NAO) in the United Kingdom provides a publicly available recommendations tracker, updated every six months, which has compiled NAO recommendations published in the Office's reports since 1 April 2019. The tracker contains data on recommendations, including whether the government has accepted recommendations, the current state of implementation progress, and the departments or bodies responsible for implementation. Users can explore the data by using various filters, such as the relevant report, departments and bodies involved, the publication date, topic or sub-topic and implementation status, as well as keywords. The aim of the tracker is to increase transparency on the outcomes of recommendations and promote scrutiny and parliamentary accountability for government spending.

Austria: Integrity Audits and Follow-up Assessments

In Austria, the Court of Audit conducts integrity audits that evaluate the adequacy of anti-corruption measures across public bodies and publishes follow-up assessments to monitor progress. These audits have informed national integrity reforms and improved preventive mechanisms against conflicts of interest and procurement risks. Beyond financial compliance, such audits contribute to the design and evaluation of public integrity policies by offering data-driven insights into governance performance.

Source: (NAO, 2025^[91]) (ACA, 2025^[92])

133. The practice of publishing audit reports is well established: 90% of EUROSAI members publish at least 80% of their external audit reports, followed by 87% of members of OLACEFS (INTOSAI Development Initiative, 2024^[93]). In Europe, SAIs generally have systems in place for monitoring implementation and making results publicly available. Many integrate follow-up monitoring into a cycle of reviewing implementation, reporting on progress and programming follow-up audits (Brétéché and Swarbrick, 2017^[94]). However, in other regions, follow-up remains a challenge. Some SAIs can issue binding requests for action by auditees, while others require action plans or progress reports.

134. Despite such practices, limited implementation continues to weaken audit impact in many Adherents. Globally, only 61% of SAIs report that financial audit recommendations are mostly implemented, and just half report the same for compliance and performance audits (INTOSAI Development Initiative, 2024^[93]). Behavioural research offers insights into possible reasons for this implementation gap:

- A large number of audit recommendations or poor presentation can undermine their perceived relevance and cause “decision fatigue” and sometimes produce a negative attitude towards audits in general.
- Perceptions of unfairness in communication between auditors and auditees can lead to reduced willingness to act on findings.
- Heads of services and public managers often show limited ownership of audit results, partly because non-compliance seldom has consequences, and recommendations may appear overly technical or legalistic (OECD, 2022^[95]).

135. To address these challenges, Adherents could strengthen the auditor–auditee relationship, simplify and prioritise audit messages, and institutionalise follow-up processes through integrated tracking systems and defined timelines. Linking oversight recommendations to management control and performance evaluation systems could also promote deeper organisational learning (OECD, 2022^[95]) (INTOSAI Development Initiative, 2024^[93]).

136. Oversight bodies can rely on various mechanisms to ensure their recommendations, opinions, sanctions and rulings are well understood and acted upon by auditees and other stakeholders, including reporting, publication, communication, public debate and systematic follow-up (INTOSAI Development Initiative, 2024^[93]). In many Adherents, legislatures have special committees or subcommittees to monitor implementation of SAI advice (Brétéché and Swarbrick, 2017^[94]) and that of other oversight bodies such as ombudsperson institutions. Many SAIs have taken initiatives to establish good working relationships with their respective parliament, raise awareness about the role of SAIs and assist parliamentarians in understanding audit reports, including through regular meetings, conferences and workshops, as well as induction trainings for new MPs (Brétéché and Swarbrick, 2017^[94]).

137. In times of crises, oversight bodies have further demonstrated their critical role in ensuring transparency and trust. During the COVID-19 pandemic, SAIs provided real-time assurance regarding the use of emergency and recovery funds, thereby supporting accountability under exceptional circumstances (OECD, 2024^[96]) (Box 17).

Box 17. The role of oversight in Response and Recovery Funds

The Board of Audit of Japan (BOA) provided real-time oversight during the COVID-19 crisis, ensuring transparent use of funds and effective risk management. Between FY 2019 and FY 2021, Japan allocated JPY 114,113 billion (USD 785 billion) for pandemic-related measures. The BOA audited budget execution, project implementation, subsidy payments, and efficiency, issuing recommendations for corrective actions. Audits were conducted during the mid-stages of projects, rather than after completion, to identify risks early and support timely improvements in fund management, enhancing accountability in emergency spending.

The Board of Audit and Inspection (BAI) in Korea focuses on post-crisis audits to improve the management of disaster response funds. COVID-19-related spending was excluded from the 2022 audit to avoid overburdening executing agencies. The BAI regularly audits funds managed by local governments, including permanent disaster mitigation funds, to identify misuse, weak prioritisation, or delays in approvals. These audits provide lessons for fund managers and strengthen the effective and timely use of public resources during large-scale crises.

Source: (OECD, 2024^[96])

138. To further strengthen the effectiveness of the response mechanisms, Adherents could further institutionalise follow-up processes through integrated tracking systems, defined timelines for responses, and dedicated units within ministries responsible for implementation. Linking oversight recommendations to performance evaluation systems and management control cycles could also enhance organisational learning and continuous improvement.

139. In response to the second line of action, **strengthening effective complaint and allegation handling** by oversight bodies, most Adherents have ombudsmen and information commissioners that provide accessible and independent channels for citizens, businesses, and civil society to report maladministration, breaches of integrity, or

violations of rights. In some countries, ombudsmen are particularly proactive in dealing with citizens' complaints. These institutions serve as essential safeguards against abuse of power and ensure redress mechanisms for affected individuals. Many have adopted digital case management systems to facilitate complaints and enhance transparency through the publication of annual statistics and performance reports.

140. In some Adherents, for example, in Finland, the Parliamentary Ombudsman holds broad constitutional powers to investigate complaints and initiate inquiries *ex officio* when evidence suggests systemic governance failures. The Ombudsman may conduct unannounced inspections in detention and social service facilities and issue legally binding recommendations (Parliamentary Ombudsman of Finland, n.d.^[97]). Such powers enable them to act preventively and not only reactively, strengthening integrity and accountability in the public sector.

141. Oversight in access to information represents another critical dimension of integrity systems, with 73% of PII Respondents report having established supervisory bodies for this purpose (OECD, 2025; 2026^[6]). Oftentimes, this oversight is ensured by an independent information commission, whereas in other cases this is part of the broader mandate of the ombudsperson institution (OECD, 2022^[98]). Nearly all PII Respondents have statutory deadlines for processing requests (98%), yet only 40% regularly publish aggregate decision data, and 38% impose sanctions for non-compliance. In 2024, only nine oversight bodies among the 19 that conducted inspections issued sanctions for violations of access-to-information laws (OECD, 2025; 2026^[6]). These findings suggest that oversight bodies increasingly have the mandate to act on wrongdoing, but that effective implementation and follow-up require further strengthening.

142. While accessibility and responsiveness have improved, many ombudsman institutions continue to face challenges such as limited enforcement powers, delays in implementation, and political interference. To address these gaps, Adherents could strengthen legal guarantees of institutional independence, introduce statutory timelines for government responses, and require public reporting on implementation of recommendations. Enhancing inter-agency coordination and promoting awareness among citizens about complaint mechanisms would further reinforce public accountability

143. Finally, regarding the third line of action, to ensure the **impartial enforcement of laws and regulations**, many Adherents provide regulatory enforcement agencies with a degree of legal, operational and financial autonomy from both those they regulate and the government. This independence prevents undue influence and ensures decisions are based on objective evidence and public interest rather than political or commercial considerations. Between 2018 and 2023, however, there has been limited progress in strengthening regulators' independence across OECD countries. On a scale of 0 to 6, average independence scores across utility sectors increased only marginally from 4.11 to 4.14 (0.5%). While scores for the e-communications, rail, and air transport sectors improved slightly, from 4.24 to 4.30, 4.05 to 4.10, and 3.67 to 3.70, respectively, those for the energy (4.36) and water (4.39) sectors remained unchanged (OECD, 2025^[61]). These findings suggest that although formal safeguards exist, their practical application may be inconsistent.

144. Accountability mechanisms are equally essential to ensure regulators remain within their mandates and sustain public confidence. Average accountability scores increased by 3% from 4.29 to 4.44 between 2018 and 2023, a more significant improvement than independence (OECD, 2025^[61]). Evidence from the OECD Network of Economic Regulators confirms a positive correlation between independence and accountability: regulators with greater autonomy tend to have clearer objectives, stronger performance reporting, and higher levels of public trust (OECD, 2025^[61]).

145. Nevertheless, governance gaps remain. Only 46% of regulators across sectors involve independent panels in leadership appointments, and in the e-communications sector, 59% of leaders are still appointed directly by government without independent oversight (OECD, 2025^[61]). Given that leadership is ultimately responsible for key regulatory decisions, government-led appointments without transparent procedures can create perceptions of undue proximity between regulators and the executive. Around 48% apply post-employment "cooling-off" periods for senior managers, though this figure drops to 27% for junior staff (OECD, 2022^[99]). Strengthening appointment transparency, clarifying grounds for dismissal, and adopting multi-year or fee-based financing can help safeguard

autonomy. Internal integrity measures, including post-employment “cooling-off” periods, integrity training, and ethical risk management, are applied inconsistently and could be expanded to further prevent regulatory capture.

146. Effectiveness of enforcement could also be improved through broader adoption of risk-based and differentiated approaches to inspections, which remain underutilised across many Adherents. Evidence suggests that 17 OECD Members indicate **allowing** but not mandating their inspection and enforcement authorities to base their activities on risk criteria and only 12 **require** the use of such approaches. Targeted enforcement, informed by data analysis and predictive tools, would allow regulators to focus resources where breaches are most likely and consequential, enhancing both protection for citizens and operational efficiency (OECD, 2025^[100]).

147. Overall, Adherents have made important steps in reinforcing the role of external oversight and control through more systematic audit follow-up, stronger complaint-handling institutions, and more transparent regulatory frameworks in line with Principle 12 (oversight) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation. Yet, implementation gaps, limited enforcement capacity, and vulnerabilities to political influence continue to challenge the effectiveness of oversight institutions. Future efforts should focus on institutionalising feedback loops between oversight findings and policy reform, guaranteeing independence and resources for complaint-handling bodies, and embedding integrity safeguards across all levels of regulatory governance. These steps will be essential to ensure that external oversight mechanisms not only detect integrity breaches, but also drive meaningful organisational and cultural change across the public sector. The forthcoming PII dataset on Principle 12, to be launched in 2026, will allow Adherents to gain deeper insight into their external oversight and control systems to safeguard integrity and hold public sector organisations to account, and compare performance *vis-à-vis* other Adherents and beyond.

Principle 13: Participation

148. Principle 13 of the 2017 Recommendation states that Adherents should:

“Encourage transparency and stakeholders’ engagement at all stages of the political process and policy cycle to promote accountability and the public interest, in particular through:

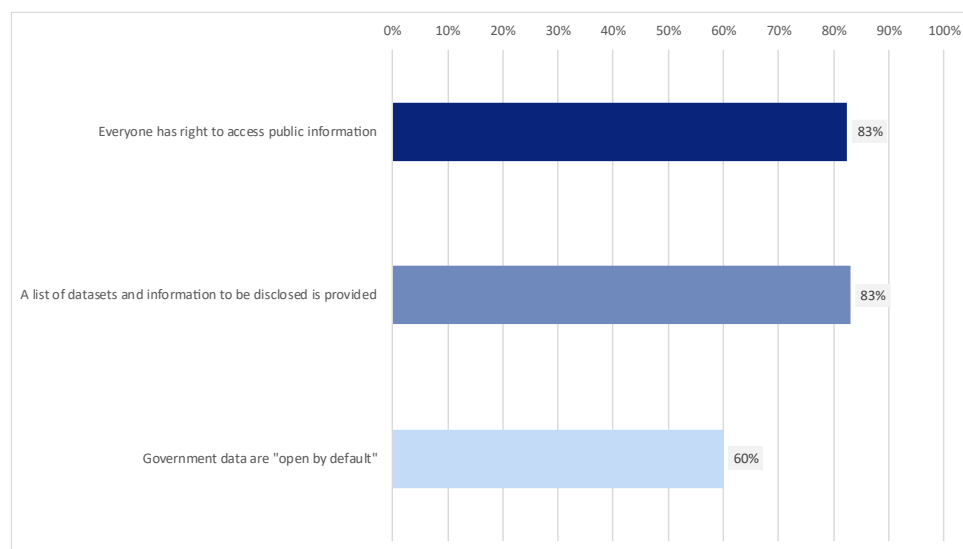
- a) promoting transparency and an open government, including ensuring access to information and open data, along with timely responses to requests for information;*
- b) granting all stakeholders – including the private sector, civil society and individuals – access in the development and implementation of public policies;*
- c) averting the capture of public policies by narrow interest groups through managing conflict-of-interest situations, and instilling transparency in lobbying activities and in the financing of political parties and election campaigns;*
- d) encouraging a society that includes “watchdog” organisations, citizens groups, labour unions and independent media.”*

149. The 2003 Recommendation acknowledges the increasingly close links between public organisations, business and civil society. Considering this, the Recommendation emphasises the need for involving stakeholders in the elaboration and implementation of the conflict-of-interest policy, while putting safeguards in place that prevent conflicts of interest arising from these interactions as well as raising awareness for the policy in these sectors.

150. Adherents have made efforts to implement this Principle. In order to **promote transparency and access to information**, 83% of PII Respondents have established the legal right of citizens to request access to public information and have regulations specifying a list of datasets to be published online (Figure 13). This number has grown following the implementing act (2023/138) of the EU Open Data Directive (2019/1024), which established a

list of datasets⁵ to be proactively published in all EU countries (OECD, 2024_[1]). However, only two thirds of PII Respondents (60%) require government data to be open by default⁶ (Figure 13).

Figure 13. Access to information and open data policies



Note: Percentage of PII Respondents having fulfilled the different criteria on transparency. How to read: 83% of PII Respondents have a regulatory framework that states that everyone has the right to access information in all the forms available.

Source: OECD Public Integrity Indicators Database (accessed 10 March 2026)

151. Information is increasingly made public in line with the 2017 Recommendation. All PII Respondents publish the results of elections, and draft laws sent to parliament. Nearly all PII Respondents publish the state budget for the current year (98%), public tenders (98%), consolidated versions of laws (90%), the company registry (88%) and the land registry (85%).

152. However, other data that is key to promoting transparency and accountability of public policy and decision making is less commonly available. Less than half of PII Respondents proactively publish agendas for Government meetings (48%); asset declarations (35%) and summary reports on access to information requests (40%). Around one-third publish ministers' agendas (38%), interest declarations (28%), and salaries of top civil servants (33%). Only 25% of PII Respondents publish aggregated lobbying data (OECD, 2025; 2026_[6]). According to the 2023 OECD Open, Useful and Re-usable data (OURdata) Index, OECD Member countries' performance is weaker when it comes to the proactive disclosure of data related to government finances and public accountability as compared to other categories, such as statistics and geospatial data, which shows that countries could improve their use of open data to support public integrity and anti-corruption efforts (OECD, 2023_[101]).

153. Principle 13 also recommends that Adherents encourage **stakeholder engagement** to promote accountability and the public interest. According to the OECD Regulatory Performance and Governance indicators (iREG), over 97% of OECD Members require public participation in consultations on some primary laws and subordinate regulations, with 82% systematically requiring public consultation (OECD, 2025_[100]). However, despite

⁵ These datasets grouped into the following categories: geospatial data, earth observation and environment data, meteorological data, statistics on a number of economic and demographic indicators, data on companies and company ownership, and data on mobility.

⁶ This means that government data should be public unless their release comes into conflict with other principles. Data should be published in any pre-existing format or language and, where appropriate, by electronic means in formats that are open, machine readable, accessible, findable and reusable, complete with their metadata.

this track record, only 32% of respondents to the OECD Trust Survey believe that their government would adopt opinions expressed in a public consultation (OECD, 2024_[7]). In the absence of meaningful follow-up, public consultations are at risk of becoming a formalistic exercise rather than an effective tool for stakeholder participation. Conversely, 70% of people across the OECD on average express confidence that they have a say in government decisions (OECD, 2024_[7]). This highlights the value of meaningful follow-up to the inputs received during public consultations, not just to enhance transparency and accountability but also to build citizens' engagement (OECD, 2022_[102]).

154. Some of the challenges that Adherents face regarding meaningful stakeholder engagement are low administrative capacity and an organisational culture that is not supportive of such processes. This often requires a cultural shift and a rethinking of the exercise from punctual participation to continued engagement throughout the policy cycle, as also discussed under principle 9 (openness). A government-wide policy that sets the requirements and objectives of stakeholder engagement can be an effective first step in this direction, supported by senior management commitment. Ensuring that public officials have the capacities in terms of training in effective methods as well as the resources to engage stakeholders is also key (OECD, 2020_[5]).

155. Principle 13 also recommends that Adherents **avert the capture of public policies by narrow interest groups** through managing conflict-of-interest situations, and instilling transparency in lobbying activities and in the financing of political parties and election campaigns. An increasing number of Adherents have established regulatory frameworks to instil transparency to **lobbying activities**, with 41% of PII Respondents having regulations in place (OECD, 2025; 2026_[6]), though lobbying frameworks could be further developed. Less than half of PII Respondents (40%) fulfil at least 60% of criteria on regulation, of which only four fulfil 80% (OECD, 2025; 2026_[6]). Lobbying frameworks are not intended to restrict or discourage lobbying, but rather to establish safeguards and standards that ensure interests are represented fairly in policymaking, and that citizens can understand who is seeking to influence policy decisions.

156. While nearly one third of PII Respondents (60%) define lobbying and lobbyists, including countries such as Canada and Ireland (Box 18), providing effective and up-to-date definitions remains a challenge in many countries. This is often because those who seek to influence the policy-making process may not be considered lobbyists. Today, lobbyists include a wide range of actors, including not only professional lobbyists, but also other businesses, civil society organisations, think tanks, business and trade associations, trade unions, and individuals mandated to represent interests, whether or not they receive compensation for these activities. In addition, social media platforms have profoundly reshaped the exercise of influence, serving increasingly as tools to sway public opinion toward specific policy positions, mobilise public support, amplify advocacy campaigns, and engage directly with policymakers (OECD, 2021_[29]). PII Respondents that do not define lobbying and lobbyists leave scope for lobbying and influence actors to misinterpret their obligations or to exploit loopholes in safeguards (OECD, 2021_[29]).

Box 18. Examples of broad definitions of 'lobbying' amongst Adherents

Canada

Communications considered as lobbying include direct communications with a federal public office holder (i.e., either in writing or orally) and grass-roots communications. The Lobbying Act defines grassroots communications as *“any appeals to members of the public through the mass media or by direct communication that seek to persuade those members of the public to communicate directly with a public office holder in an attempt to place pressure on the public office holder to endorse a particular opinion”*. For consultant lobbyists (those who lobby on behalf of clients), arranging a meeting between a public office holder and any other person is also considered as lobbying.

The means used for the purpose of appealing to the general public may include letter and electronic messaging campaigns, advertisements, websites, social media posts and platforms. Participation in the strategic and operational activities of an appeal to the general public (approving items, providing advice, conducting research

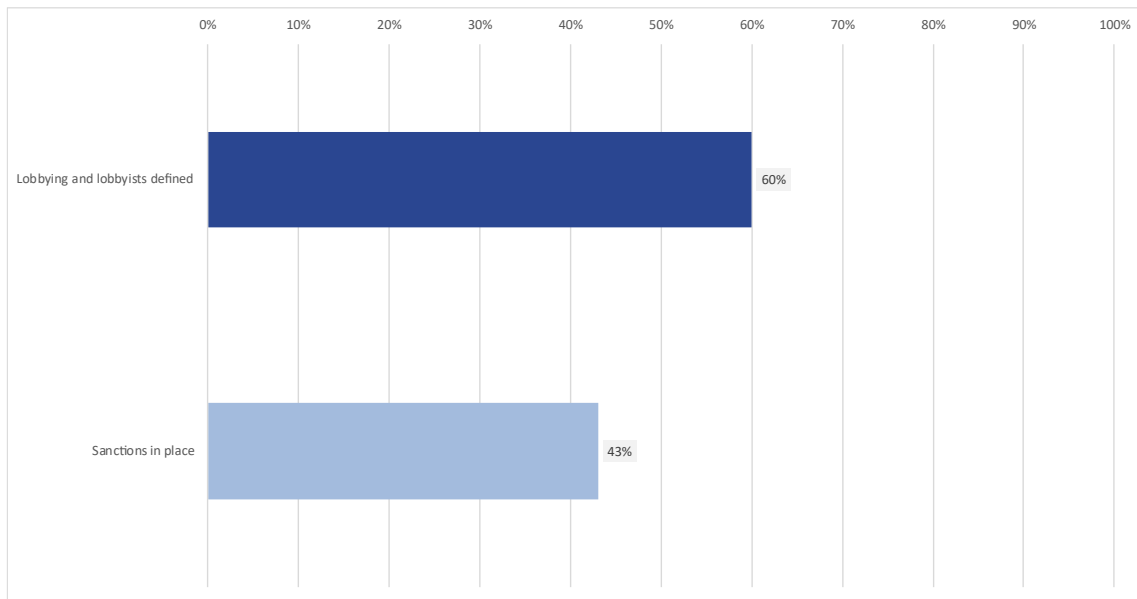
and analysis, writing messages, preparing content, disseminating content, and interacting with members of the public) also requires registration.

Ireland

Relevant communications mean communications (whether oral or written and however made) made personally (directly or indirectly) to a designated public official in relation to a relevant matter. They can also include informal communications such as casual encounters, social gatherings, social media messages directed to public officials, or “grassroots” communication, defined as an activity where an organisation instructs its members or supporters to contact public officials on a particular matter.

Source: (OECD, 2021_[29])

157. Adherents could also do more to ensure that the standards set out in their regulatory frameworks are maintained in practice through effective oversight and enforcement mechanisms. Less than half (43%) of PII Respondents have defined proportionate sanctions for breaches of standards for transparency and integrity in lobbying (Figure 14). And only 17 PII Respondents have established an authority to oversee compliance with lobbying regulations. Of the 17 PII Respondents with sanctions in place, 12 investigated non-compliance with lobbying regulations within the past year. By contrast, only one of the PII Respondents without sanctions in place conducted an investigation, making it difficult to assess compliance with rules and good lobbying practices (OECD, 2025; 2026_[6]) (OECD, 2024_[1]). Even where sanctions are in place, there is evidence that concerned officials lack awareness of their existence, thus undermining their deterrent effect (OECD, 2021_[29]; Šimral, 2020_[103]).

Figure 14. Definitions of lobbying/lobbyists and sanctions regulated

Note: Percentage of Respondents having defined lobbying activities and actors in the regulatory framework, and having sanctions established for breaches in lobbying. How to read: While 60% of Respondents have defined lobbying activities and actors in their regulatory framework, only 43% of them have established sanctions for breaches of this framework.

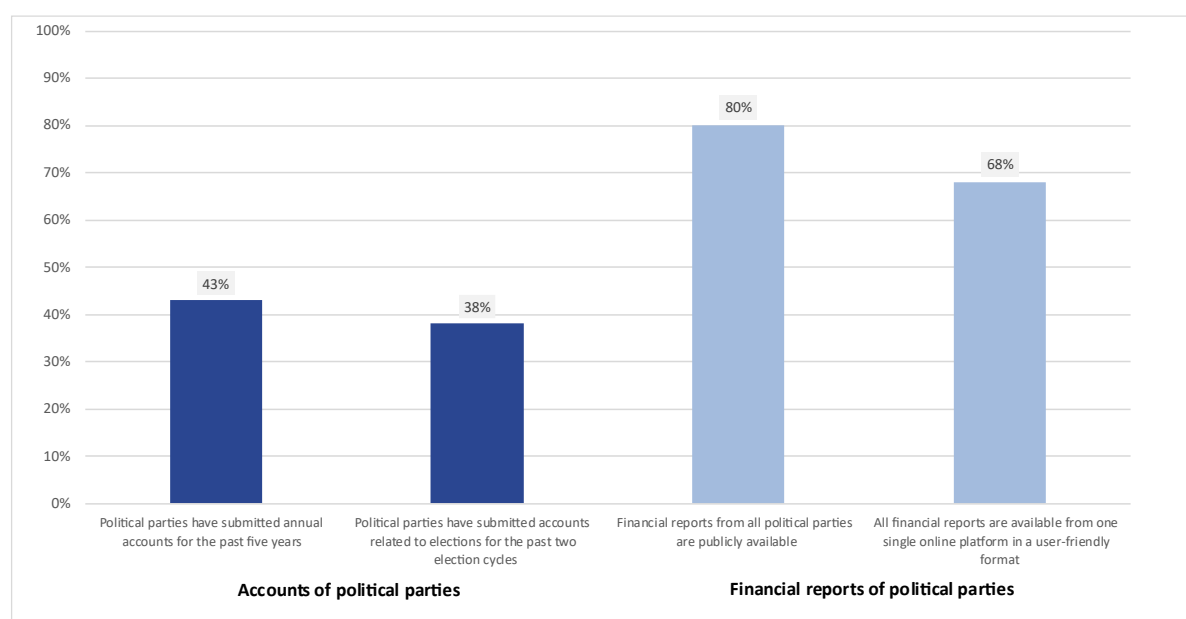
Source: OECD Public Integrity Indicators Database (accessed 10 March 2026)

158. **Transparency measures around lobbying** and influence activities are intended to clarify who is lobbying, who is being lobbied, how they are lobbying, and what they are lobbying about. Among the primary tools for increasing transparency is a public lobbying register. In the past decade, the number of Adherents with lobbying registers has increased, with 24 PII Respondents now having such a register in place. However, many lobbying registers do not provide enough information to mitigate integrity risks. Of the 24 PII Respondents with a publicly available register, all include the name of the lobbyist but only 14 include information about the type of lobbying conducted. Only ten countries include information on the piece of legislation or regulation targeted, and other five countries include information on the budget and expenses for lobbying (OECD, 2025; 2026^[6]). Although public lobbying registers are increasingly common, they may not be meaningfully improving transparency in lobbying if insufficient information is collected or available (OECD, 2024^[1]).

159. While lobbying registers are a key tool to promote transparency, they are most effective when complemented by other measures that strengthen transparency in public decision-making. A broader framework may include open agendas for senior officials as well as information on beneficial ownership. 15 PII Respondents publish open agendas for ministers online that provide information about who ministers are meeting with and the purpose of the meetings. Furthermore, 6 PII Respondents have a publicly available register of beneficial ownership, which helps enable both citizens and policymakers to better understand the actors behind complex and opaque corporate structures, and who is ultimately benefiting from lobbying and influence activities (OECD, 2025; 2026^[6]). It should be noted that there has been a sharp decline in rules requiring the public disclosure of beneficial ownership information amongst Adherents in Europe, reflecting a judgment of the Court of Justice of the European Union annulling the provision of the Fifth Anti-Money Laundering Directive (AMLD5) requiring unrestricted public access to beneficial ownership registers, on the grounds that it did not adequately balance transparency objectives with the protection of fundamental rights to privacy and personal data (OECD, Forthcoming^[17]). Thus, while some progress has been made, the adoption of transparency measures to promote integrity in lobbying and influence activities is still the exception rather than the rule (OECD, 2024^[1]).

160. Regarding **transparency of the financing of political parties and election campaigns**, 32 PII Respondents make financial reports from all political parties publicly available, and 27 PII Respondents do so on one single online platform in a user-friendly format (OECD, 2025; 2026_[6]). This shows relatively strong implementation of disclosure frameworks established by governments. However, compliance by political parties remains uneven. Only 43% of PII Respondents reported that all political parties have submitted annual accounts within the deadlines set by national legislation over the past five years, and just 38% confirmed timely submission of election-related accounts for the past two electoral cycles (Figure 15).

Figure 15. Compliance with financial reporting and transparency requirements by political parties



Note: Percentage of PII Respondents fulfilling different criteria on financial reporting and transparency of financing of political parties. How to read: In 38% of PII Respondents, all political parties have submitted accounts related to elections within the timelines defined by national legislation for the past two election cycles. Source: OECD Public Integrity Indicators Database (accessed 10 March 2026).

161. To prevent policy capture, most Adherents prohibit contributions to political parties from foreign states, enterprises, and state-owned enterprises, with restrictions in place in 83% of PII Respondents. By contrast, 17 PII Respondents (43%) still allow anonymous donations (OECD, 2025; 2026_[6]). Such donations heighten the risk of undue influence, as they obscure funding sources and impede verification of donation legality, enabling potential circumvention of existing bans on foreign or state-linked contributions.

162. Regulations are effective only when supported by oversight institutions with sufficient independence and legal authority to enforce compliance (OECD, 2024_[11]). Three-quarters (75%) of PII Respondents report having an independent body mandated to supervise political financing. Nonetheless, even where oversight mechanisms exist, timely and complete reporting by political parties remains a persistent challenge.

163. Finally, Principle 13 also recommends Adherents to encourage **a society that includes “watchdog” organisations, citizens groups, labour unions and independent media** (OECD, 2020_[5]). This requires as precondition a solid civic space that is defined as the set of legal, policy, institutional and practical conditions that non-governmental actors need to access information, express themselves, and associate, organise and participate in public life (OECD, 2025_[61]). Within this framework, fundamental rights such as freedom of opinion and expression, freedom of association, peaceful assembly, and the right to participate in public affairs are the foundational basis for

civil society to carry out its watchdog role (OECD, 2020^[5]). These principles are enshrined in international human rights law and are well established in Adherents' national legal frameworks (OECD, 2022^[98]).

164. Protecting and promoting civic space is critical to enable “watchdog organisations”. Well-designed transparency and integrity standards for civil society reinforce, rather than undermine, this objective (OECD, 2022^[98]). In some cases, Adherents have referenced existing international standards in developing laws that may inadvertently place additional constraints on civil society and independent media. In some other cases, certain restrictive foreign influence regulations label organisations receiving foreign funding aiming to influence state policy as “foreign agents”, a designation that has led to increased control, surveillance and stigmatisation of foreign-supported civic and media organisations, seeking to limit their activities and ultimately undermining their existence (European Digital Media Observatory, 2024^[104]; Laufer, 2017^[105]). These approaches are fundamentally misaligned with international norms, including the OECD Recommendation on Transparency and Integrity in Lobbying and Influence, and with best practices in this area, including foreign influence regulations currently in place in the United States, the United Kingdom, Australia and France, which emphasise transparency and openness in decision-making (OECD, 2024^[106]).

165. Adherents can foster an enabling environment for civil society through, for example, transparent, accessible and fair registration procedures, as well as predictable, accessible, transparent and sustainable funding for civil society organisations (CSOs). Regarding the latter, in 93% of OECD Members CSOs received some form of central or federal funding in 2019. However, there is a lack of comprehensive and disaggregated data on government funding, which is often only disbursed for short-term projects, posing challenges for CSO sustainability (OECD, 2025^[61]). To further engage civil society actors in policy development, a national CSO strategy can help governments set clear objectives and define outcomes for collaboration with CSOs, both as governance partners and as independent actors. Such strategies are increasingly commonplace, with 21 out of 28 OECD Member countries (75%) with data available having adopted policies or strategies to enhance the enabling environment for CSOs in 2020 (OECD, 2025^[61]).

166. An independent media is also critical to promote accountability and the public interest in line with the 2017 Recommendation. Adherents generally guarantee freedom of the press in law, with some having strengthened rights and protections of journalists and the media in recent years, as is the case for example in Norway (Box 19). At the same time, harassment and threats targeting journalists remain an area of concern, and national security measures have the potential to stifle freedom of the press in some countries. Overall, 63% of Adherents have a good or satisfactory performance in the 2025 World Press Freedom Index, whereas in 37% of Adherents the situation is classified as problematic, difficult, or very serious (Reporters Without Borders, 2025^[107]). This indicates significant room for Adherents to continue improving conditions for an independent media, while recognising that they face an increasing number of challenges posed by digital technology, including the misuse of artificial intelligence, the sharing of illegal content online, as well as online hate speech and harassment (OECD, 2022^[98]).

Box 19. Norway's Media Liability Act

In Norway, since 2020, a new media responsibility law defines journalists' freedoms and responsibilities. The purpose of the act is to facilitate open, informed public discourse by ensuring editorial independence and establishing clear liability regulations for content published in editor-controlled journalistic media.

The duties of media professionals defined in the law include the obligation to have an editor (Section 4 of the law) and for that person to be known (Section 5 of the law). The editor is responsible for the content of the medium but also for the clarity of the rules applying to user-generated content. In cases where a medium hosts editorial content and user-generated content, users should be able to distinguish these (Section 6 of the law). In addition, the law also ensures the editorial independence of the medium, stating that the publisher, the owner or other company management should not interfere with the editor's final decision on content (Section 7 of the law).

Source: (Government of Norway, 2020^[108])

167. Overall, Adherents have taken decisive steps to improve transparency, access to information and stakeholder engagement in line with Principle 13 (participation) of the 2017 Recommendation and relevant provisions of the 2003 Recommendation. Most Adherents provide access to information and have made public consultations a requirement in their legislative process. At the same time, low administrative capacity and organisational cultures continue to pose challenges to making stakeholder engagement more meaningful. To avert policy capture, most Adherents have established rules around political party and election finance and are increasingly regulating lobbying and influence activities, although these areas remain underregulated and implementation often weak. Adherents could do more to strengthen oversight institutions, ensure timely disclosure and support meaningful engagement of all stakeholders throughout the policy cycle. To ensure civil society and independent media can play a watchdog role, Adherents are ensuring independent oversight to safeguard fundamental rights and are supporting CSOs through public funding. At the same time, there is room for Adherents to continue improving conditions for an independent media, while navigating emerging challenges from AI and spread of illegal content and harassment online.

4 Dissemination

168. The dissemination of the 2003 and 2017 Recommendations by Adherents and the Secretariat has significantly contributed to raising awareness and underscoring their relevance in strengthening public integrity and combating corruption. Efforts to disseminate the Recommendations have included their translation, the preparation of practical guidance for their implementation, data collection, policy analysis and advice, capacity building and policy dialogue, as well as communication activities.

169. To facilitate its use by Adherents and beyond, the 2017 Recommendation has been translated into 24 languages⁷. The OECD Public Integrity Handbook, which is available in English, French, Arabic, German, Spanish, Portuguese and Ukrainian, provides guidance to government, business and civil society on implementing the Recommendation (OECD, 2020_[5]). Similarly, the Toolkit for Managing Conflict of Interest and the OECD Public Integrity Maturity Models support Adherents in translating the 2003 and the 2017 Recommendations into practice.

170. By providing an objective assessment of the strengths and weaknesses of countries' anti-corruption and integrity systems, the PIIs help countries identify corruption risks, benchmark good practices and target reforms that are aligned with the principles of the 2003 and 2017 Recommendations. Based on primary data sources and validated by countries, the PIIs help bolster global efforts against corruption by providing actionable data. In addition to OECD Members, 32 OECD partner countries, including non-Member Adherents, are participating in the PIIs, supporting the dissemination of the Recommendations well beyond Adherents.

171. Drawing on the PIIs as its primary data source, the biennial OECD Anti-Corruption and Integrity Outlook tracks the performance of OECD Member and partner countries' integrity frameworks and analyses integrity risks, providing key insights for decision-makers on where to prioritise reforms. Following the first edition released in 2024, which provided a snapshot of current trends and challenges in OECD countries' integrity frameworks (OECD, 2024_[11]), the Outlook's 2026 edition will expand coverage to the partner countries participating in the PIIs, and present integrity trends across countries and regions, thus further consolidating the Recommendations' geographical reach.

172. Complementing the PIIs' benchmarks and the high-level insights presented in the Outlook, the OECD Integrity Reviews provide comprehensive and in-depth analysis of a country's public integrity framework across the three pillars of the 2017 Recommendation and relevant provisions of the 2003 Recommendation. The Integrity Reviews formulate tailored policy recommendations that help policy makers improve policies, adopt good practices and implement established principles and standards, thus supporting both the dissemination and implementation of the Recommendations in recipient countries. Integrity Reviews have been conducted upon the request from Adherents, including Argentina (OECD, 2019_[111]), Quebec (Canada) (OECD, 2020_[109]), Colombia (OECD, 2017_[74]), Costa Rica (OECD, 2022_[110]), the State of Mexico (Mexico) (OECD, 2021_[82]), Peru (OECD, 2024_[111]), Slovakia (OECD, 2022_[10]) and Sweden (OECD, 2025_[112]), as well as OECD accession and partner countries, such as Brazil (OECD, 2025_[113]), Jordan (OECD, 2024_[114]), Kazakhstan (OECD, 2025_[115]), Thailand (OECD, Forthcoming_[116]) and Ukraine (OECD, 2025_[117]).

173. In addition, targeted thematic reviews have been prepared to support interested Adherents and non-Adherents in improving specific aspects of their integrity systems in line with the Recommendations, for example

⁷ Besides the official English and French versions, unofficial translations of the 2017 Recommendation are available in Bulgarian, Chinese, Czech, Finnish, German, Greek, Hungarian, Icelandic, Italian, Japanese, Korean, Latvian, Lithuanian, Polish, Portuguese (Brazilian and European), Romanian, Russian, Slovak, Spanish, Thai and Ukrainian.

their pre- and post-public employment framework, corruption risk management, anti-corruption and integrity strategy, or external audit. These reviews are usually complemented by targeted capacity building activities that are meant to help support the implementation of relevant policy recommendations.

174. Finally, the relevance of the policy issues covered by the Recommendations in relation to broader public governance issues and trends is further reinforced through the inclusion of PII data in OECD flagship publications such as *Government at a Glance* (OECD, 2025^[61]) and the reports on the results of the OECD Trust Survey (OECD, 2024^[7]), further contributing to their dissemination. In addition, the Secretariat contributes to cross-cutting initiatives such as the OECD Reinforcing Democracy Initiative and its Global Forum on Building Trust and Reinforcing Democracy, which seek to address key public governance challenges facing democracies.

175. Regarding policy dialogue, the meetings of the PGC and the PIAC are the primary forums for Adherents and the Secretariat to share good practices and technical expertise, further promoting public integrity practices in line with the Recommendations. Beyond the committee and working party meetings, the annual Global Anti-Corruption and Integrity Forum (GACIF), as the leading multi-stakeholder forum in the field, gathers leaders from government, civil society, and the private sector from across the globe for policy dialogue on key integrity issues and trends that are of relevance to the Recommendations, thus further contributing to their dissemination. The 13th edition of the GACIF, in 2025, focused on the role that today's unprecedented innovations can play in transforming the global fight against corruption and inventing new ways to promote integrity and transparency.

176. Complementing this global dialogue, the Secretariat conducts regional outreach to disseminate the Recommendations through several networks, including the OECD-ADB Anti-Corruption initiative for Asia and the Pacific, the OECD-IDB Public Integrity Network for Latin America and the Caribbean and the MENA-OECD Governance Programme. In support of the whole-of-society approach promoted by the Recommendations, the Galvanizing the Private Sector programme is a public-private co-operation initiative that seeks to mobilise the private sector as key contributors in the fight against corruption and as promoters of a rules-based international business climate.

177. Beyond the OECD, the Secretariat has promoted the Recommendations' principles in relevant national and international forums, including the Conference of the States Parties to the United Nations Convention against Corruption, the G20 Anti-Corruption Working Group or relevant meetings of the Council of Europe's Group of States Against Corruption.

178. Finally, the Secretariat actively promotes the dissemination of the Recommendations through its communications activities. These activities are primarily carried out on digital channels, such as the OECD website⁸, the OECD's social media accounts dedicated to Public Governance⁹, and the OECD Anti-Corruption and Integrity newsletter.

⁸ <https://www.oecd.org/en.html>

⁹ <https://www.linkedin.com/company/oecd-public-governance>; <https://x.com/OECDgov>;
<https://bsky.app/profile/oecdgovernance.bsky.social>

5 Summary and conclusions

Implementation

179. This Report highlights that Adherents have made progress in implementing the Recommendations, though the pace and focus of reforms vary. Adherents have prioritised different provisions, reflecting diverse policy contexts, regulatory and institutional arrangements and capacities. The following are the main findings specific to each element of the Recommendations:

180. **Principle 1 (commitment):** Although most Adherents have formally implemented the elements of this Principle and relevant provisions of the 2003 Recommendation, enforcement gaps persist, particularly when senior political or managerial officials fail to meet integrity standards or properly manage private interests, and scepticism regarding the integrity of high-level officials remains widespread. Adherents could focus on ensuring that high-level commitments are effectively integrated into daily operations and organisational management processes. While risk-based standards such as interest declarations, cooling-off periods, and codes of conduct are widely in place, monitoring and enforcement remain inconsistent, and integrity leadership is not always demonstrated in practice. Commitment could also be more fully embraced in organisational management and control, as relatively few institutions have established formal audit charters or procedure manuals.

181. **Principle 2 (responsibilities):** There is a fair level of implementation of this Principle and relevant provisions of the 2003 Recommendation. However, gaps remain when it comes to assigning responsibilities at the organisational level (e.g. risk management) as well as in specific policy areas (e.g. lobbying). Additionally, limited human and financial resources hamper integrity actors in executing their responsibilities properly, which has the potential to weaken the overall effectiveness of the integrity system. Whilst many Adherents have some mechanisms to co-ordinate integrity actors, there remains significant scope to strengthen synergies and enhance co-ordination, both horizontally and vertically.

182. **Principle 3 (strategy):** The implementation of this Principle and relevant provisions of the 2003 Recommendation is strong regarding the adoption of a strategic approach. This is a positive development since only a decade ago very few Adherents approached integrity and anti-corruption in a coherent and comprehensive manner. However, there is room to strengthen strategy development as few of them are based on detailed evidence or developed through broad consultation, which limits inclusiveness and relevance for emerging priorities. Implementation and monitoring practices also vary, with some Adherents lacking consistent action plans or regular reporting. Evaluation processes are still developing, and lessons from past strategies are not always fully incorporated.

183. **Principle 4 (standards):** Adherents have established robust standards of conduct for public officials in their legal systems and organisational policies in line with this Principle and relevant provisions of the 2003 Recommendation, in particular regarding standards around conflict of interest. Despite the relative strength of regulatory frameworks in this area, Adherents could considerably strengthen efforts to ensure effective implementation of relevant standards. This includes consistently monitoring compliance and whenever relevant applying the necessary sanctions. These shortcomings are particularly pronounced in the area of pre- and post-public employment. Adherents address related risks through varying approaches, but only a few are tracking post-employment activities of public office holders.

184. **Principle 5 (whole of society):** Adherents have made limited progress in implementing this Principle and relevant provisions of the 2003 Recommendation. Engagement of relevant stakeholders in the development, update and implementation of the public integrity system remains limited, more could be done to encourage the private sector, civil society and individuals to uphold integrity values as a shared responsibility, and awareness raising, including civic education face challenges in achieving lasting impact. Most Adherents will need to implement this Principle more consistently in order to truly promote a whole-of-society culture of public integrity.

185. **Principle 6 (leadership):** Adherents have made progress in implementing this Principle and relevant provisions of the 2003 Recommendation, yet there remains scope to embed integrity considerations systematically into the selection, appointment, and promotion of managers. Greater attention could also be given to equipping leaders at all levels, not only senior officials, with the skills to manage conflict of interest and integrity risks, and effectively lead change in their organisations. Enhancing integrity competencies through leadership development, aligning performance assessments with behavioural outcomes, and providing strategic, continuous training would support leaders in demonstrating integrity and better preparedness to address complex situations.

186. **Principle 7 (merit):** Adherents have made substantial progress in embedding merit-based principles across their civil services in line with this Principle, through competitive recruitment, enhanced transparency, and strengthened safeguards to ensure fairness and integrity. Complementary measures such as protecting selection committees from political influence, refining performance evaluations, and promoting openness and participation further reinforce integrity and public trust. Nonetheless, challenges persist, including lengthy recruitment procedures, uneven application of merit principles, and perceptions of favouritism that can erode confidence in public institutions. Sustaining a capable, meritocratic civil service therefore requires continued development of competencies, effective oversight, and strategic empowerment of managers. Fostering integrity, professionalism, efficiency, agility, and inclusiveness in contemporary public administration is a continuous process, but essential to reinforcing confidence in the public workforce. The forthcoming PII dataset on Principle 7, to be released in 2026, will allow Adherents to gain deeper insight into the strengths and weaknesses of merit-based procedures for recruitment, promotion, demotion and termination of service of civil servants and their implementation in practice.

187. **Principle 8 (capacity-building):** Adherents have made efforts to implement this Principle and relevant provisions of the 2003 Recommendation, while more could be done to provide sufficient information, training, guidance and timely advice for public officials to apply public integrity standards in the workplace. This includes developing and implementing integrity training for different groups of officials and establishing mechanisms for providing confidential advice on ethical dilemmas, supported by integrity contact points that benefit from capacity-building and knowledge sharing through specialised networks. At the same time, there is room to further improve capacity building, for example, through longer-term and consistent training opportunities for all levels of public officials.

188. **Principle 9 (openness):** Adherents have increasingly adopted both informal and formal mechanisms to foster an open culture and facilitate reporting of integrity concerns. However, intrinsic cultural issues, such as hierarchical and bureaucratic environments, limit the effective implementation of this Principle and relevant provisions of the 2003 Recommendation. There is therefore a significant room for improving their implementation. While some efforts have been made by Adherents, many do not yet have a fully open culture where ethical dilemmas, public integrity concerns, and errors can be discussed freely. Adherents could continue strengthening legal clarity, cultural acceptance of whistleblowers and their effective protection against reprisals. Systematic monitoring of reporting mechanisms is also essential to ensure that disclosures lead to meaningful organisational improvements.

189. **Principle 10 (risk management):** Risk management and internal control frameworks have been established, in line with this Principle. However, several challenges remain when it comes to ensuring the effectiveness of these frameworks to safeguard integrity in public sector organisations. Notably, implementation of risk management and internal control is lagging, monitoring and follow-up are often weak and internal audit remains underdeveloped. Without a central function to provide guidance, ensure consistency, and collect data on performance, internal control

and audit frameworks will remain unevenly applied. Strengthening oversight and establishing clear responsibility for supporting line ministries and reporting on implementation, is essential to closing the gap between regulations on paper and their effectiveness in practice.

190. **Principle 11 (enforcement):** Overall, Adherents have made progress in implementing this Principle and relevant provisions of the 2003 Recommendation, even though scope for improvement remains. They have established frameworks to strengthen the enforcement of public integrity standards, by putting in place basic legal and institutional frameworks that support fairness, objectivity, and timeliness, notably through safeguards for the organisational and individual independence of the judiciary and the integrity of prosecutors. Nonetheless, procedures to ensure merit in the selection, appointment and promotion of prosecutors should be strengthened, the implementation of standards of conduct and verification of interest declarations of judges improved, and the implementation of whistleblowing frameworks strengthened. Likewise, there remains scope to strengthen procedural fairness and objectivity guarantees in disciplinary procedures and to ensure their consistent application. Adherents could continue to enhance oversight, information sharing and co-ordination, notably through greater use of electronic case management systems, to support timely and proportionate enforcement and improved monitoring. Finally, making data on disciplinary procedures publicly available and communicating the results clearly can further strengthen transparency, enhance accountability, and support the ongoing improvement of enforcement systems.

191. **Principle 12 (oversight):** Adherents have made important steps in reinforcing the role of external oversight and control through more systematic audit follow-up, stronger complaint-handling institutions, and more transparent regulatory frameworks in line with this Principle and relevant provisions of the 2003 Recommendation. Yet, implementation gaps, limited enforcement capacity, and vulnerabilities to political influence continue to challenge the effectiveness of oversight institutions. Future efforts could focus on institutionalising feedback loops between oversight findings and policy reform, guaranteeing independence and resources for complaint-handling bodies, and embedding integrity safeguards across all levels of regulatory governance. These steps will be essential to ensure that external oversight mechanisms not only detect integrity breaches but also drive meaningful organisational and cultural change across the public sector. The forthcoming PII dataset on Principle 12, to be launched in 2026, will allow Adherents to gain deeper insight into their external oversight and control systems to safeguard integrity and hold public sector organisations to account, and compare performance vis-à-vis other Adherents and beyond.

192. **Principle 13 (participation):** Adherents have taken decisive steps to improve transparency, access to information and stakeholder engagement in line with this Principle and relevant provisions of the 2003 Recommendation. Most Adherents provide access to information and have made public consultations a requirement in their legislative process. At the same time, low administrative capacity and organisational cultures continue to pose challenges to making stakeholder engagement more meaningful. To avert policy capture, most Adherents have established rules around political party and election finance and are increasingly regulating lobbying and influence activities, although these areas remain underregulated and implementation often weak. Adherents could do more to strengthen oversight institutions, ensure timely disclosure and support meaningful engagement of all stakeholders throughout the policy cycle. To ensure civil society and independent media can play a watchdog role, Adherents are ensuring independent oversight to safeguard fundamental rights and are supporting CSOs through public funding. At the same time, there is room for Adherents to continue improving conditions for an independent media, while navigating emerging challenges from AI and spread of illegal content and harassment online.

Dissemination

193. The dissemination of the 2003 and 2017 Recommendations by Adherents and the Secretariat has significantly contributed to raising awareness and underscoring their relevance in strengthening public integrity and combating corruption. Efforts to disseminate the Recommendations have included their translation, the preparation of practical guidance for their implementation, data collection, policy analysis and advice, capacity building and policy dialogue, as well as communication activities.

194. Besides the Public Integrity Handbook, the Toolkit for Managing Conflict of Interest and the OECD Public Integrity Maturity Models that provide guidance to Adherents in implementing the 2017 and 2003 Recommendations, the data and analysis provided by the PIIs and the Anti-Corruption and Integrity Outlook have accelerated the dissemination of the Recommendations. They allow Adherents and an increasing number of non-Adherents to identify corruption risks, benchmark best practices and target reforms. Complementing these efforts, the OECD Integrity Reviews provide tailored policy recommendations based on a comprehensive and in-depth analysis of a country's public integrity framework across the provisions of the Recommendations.

195. Beyond the committee and working party meetings, the annual Global Anti-Corruption and Integrity Forum (GACIF) gathers leaders from government, civil society, and the private sector from across the globe for policy discussions on key integrity issues and trends that are of relevance to the Recommendations, thus further contributing to their dissemination. In addition, the Secretariat engages Adherents and non-Adherents through regional networks for Asia and the Pacific, Latin America and the Caribbean, and the Middle East and North Africa, and facilitates public-private partnership through the Galvanising the Private Sector programme.

196. The relevance of the policy issues covered by the Recommendations in relation to broader public governance issues and trends is further reinforced through the widespread dissemination of PII data in OECD flagship publications such as the Anti-Corruption and Integrity Outlook and other Government at a Glance (OECD, 2025^[61]) and the reports on the results of the OECD Trust Survey (OECD, 2024^[7]). The Secretariat also contributes to the OECD Reinforcing Democracy Initiative and its Global Forum on Democracy, which seek to address key public governance challenges facing democracies.

197. Beyond the OECD, the Secretariat has promoted the Recommendations' principles in relevant national and international forums, including the Conference of the States Parties to the United Nations Convention against Corruption, the G20 Anti-Corruption Working Group or relevant meetings of the Council of Europe's Group of States Against Corruption.

Continued relevance

198. Fostering public integrity and fighting corruption are cornerstones of good governance and essential to the economic and social well-being and prosperity of individuals and societies. Against this background, the Report demonstrates that the Recommendations continue to be of high relevance to Adherents, and to the work of the Public Governance Committee and its Working Party on Public Integrity and Anti-Corruption, while acknowledging remaining implementation gaps. This has also been stressed by Adherents during the informal consultation in March 2025, the PIAC Chair's presentation at the October 2025 PGC meeting [[GOV/PGC/A\(2025\)6/REV2](#)] and the discussion of the Report at the PIAC meeting in November 2025 [[GOV/PGC/INT/M\(2025\)2](#)]. No revisions are therefore required in the short-to-medium term.

199. The Report shows that many Adherents have made notable progress in addressing corruption and strengthening public integrity across the pillars of the Recommendations. The increase in the adoption of anti-corruption and integrity strategies in the past decade is particularly noteworthy, reflecting improved understanding, political commitment and ability across Adherents to approach anti-corruption and public integrity in a coherent and comprehensive manner. Adherents have also strengthened standards of conduct for public officials, including on conflict of interest, and notable efforts have been made to improve transparency and stakeholder engagement in policy making. For example, an increasing number of Adherents are establishing regulatory frameworks to enhance transparency and integrity in lobbying and influence activities, enabling them to address the realities of a changing lobbying and influence landscape, mitigate risks of foreign interference and meet citizens' expectations, even though this area remains underregulated.

200. Notwithstanding these advancements, the Report also highlights that room for improvement remains across all principles of the Recommendations. In particular, Adherents grapple with sustaining and ensuring impact of efforts aimed at instilling a culture of integrity and openness in the public sector and across the whole of society, including

by raising awareness, promoting civic education, maintaining partnerships, building capacities, breaking through a culture of silence and protecting whistleblowers. In addition, a lack of monitoring and enforcement hampers the effective implementation of relevant regulatory frameworks and organisational policies across Adherents. Further efforts can be made to strengthen judicial integrity and transparency and integrity in decision-making to improve accountability. Overall, scepticism toward the integrity of high-level officials and perceptions around undue influence in policy making remain widespread and trust in the civil service is decreasing.

201. Strengthening institutional safeguards, enhancing transparency and enforcing ethical standards remain essential to rebuilding public trust and ensuring that both elected officials and civil servants are acting in the public interest. At the same time, Adherents are dealing with growing fiscal pressures and a changing geopolitical landscape. While these circumstances underscore the need for preventing corruption and strengthening public integrity to avoid waste and ensure the adequate use of public resources, they may also lead to shifts in policy focus and place pressures on the resources required to sustain anti-corruption and integrity efforts. It is therefore even more important for Adherents to increase the efficiency and effectiveness of their efforts to implement the Recommendations by moving from a rules-based to a risk-based approach. This can include harnessing the potential of data analytics and digital technologies to combat fraud and corruption, by proactively detecting and flagging emerging integrity risks and conducting oversight, using behavioural insights to inform anti-corruption reforms, building sustainable public private partnerships, strengthening judicial integrity and investing in education and communication, protecting whistleblowers, clarifying the links between integrity and productivity, and exploring the connections between corruption and organised crime.

Next steps

202. Accordingly, work to support Adherents in implementing the Recommendations will continue and the PGC will report back to the Council on their implementation, dissemination and continued relevance in ten years. An earlier report to the Council would be prepared if changes in the field warrant it.

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