

Good progress can be reported in the area of **anti-corruption policy**.

The Electoral Code was amended to clarify the rules on financing election campaigns, the transparency of election funds, including for election advertising, and registration of donations. The Law on Managing Confiscated Property and Items Seized in Criminal and Misdemeanour Proceedings entered into force.

The amendments to the Law on Financing of Political Parties were adopted in July. They enhance the transparency of donations, strengthen the provisions against illegal donations, tighten reporting obligations of the political parties and introduce more dissuasive sanctions.

Amendments to the Criminal Code including new provisions on extended confiscation of proceeds of crime, illicit enrichment and criminal liability of legal persons for trading influence were enacted.

Amendments to the law on conflict of interest were enacted. The amendments introduce a new definition of the scope of the law, expressly including civil servants; strengthen the powers of the SCPC for control and prevention of conflict of interest; introduce the obligation of the officials to submit a conflict of interest declaration and provide for misdemeanour sanctions for non-observance of the law.

The supervisory authorities, the Public Revenue Office and the State Audit Office, have an important role to play in ensuring full implementation.

The unit specialising in cases of organised crime and corruption within the General Public Prosecutor's Office became a Basic Prosecutor's Office.

There were further indictments and convictions in high-profile cases. The reforms in the healthcare system started to produce results in addressing small-scale corruption and steps were taken to tackle larger-scale corruption in hospitals.

The databases of the State Commission for Prevention of Corruption (SCPC) and the Public Revenue Office (PRO) were interconnected. This allows more accurate records of asset declarations to be compiled. In 2008 the SCPC initiated 45 misdemeanour procedures for failure to submit asset declarations. In one of these cases a fine was imposed, in two others the charges were dismissed and the rest are pending. The PRO started 48 procedures in 2008 to check the origin of assets declared. In nine cases a decision was given. Four of these cases were concluded by taxing the unjustified income at 70% and in two cases criminal charges were brought. The customs administration took over responsibility for registering and keeping records of asset declarations by customs officers. Cases that raise reasonable doubts about the origin of the assets are referred to the PRO.

Interception of communications, an effective tool for detection and investigation of corruption cases, was introduced in 2009 and is starting to be used.

The SCPC began to implement the action plan on conflict of interest. Guidelines were developed to help officials and the general public identify potential conflicts of interest. Training was organised for judges and prosecutors on the content of the guidelines. Since 2008, 73 cases on conflict of interest were initiated and 43 were completed. In 11 of them a

conflict of interest was found. Training also started on freezing and confiscation of proceeds of crime and on the criminal liability of legal persons.

The SCPC adopted a strategic plan on public relations which outlined action to be taken to improve communication with the public and the media, including appointment of a spokesperson. The SCPC took steps to enhance cooperation with other bodies.

Cooperation between law enforcement agencies was further strengthened. Three more institutions (the State Electoral Commission, the Council of Public Prosecutors and the State Appeals Commission for Public Procurement) signed the anti-corruption cooperation protocol, bringing the total number of signatories to 15. The signatories analysed the results of the first year of implementation of the protocol and decided on improvements. Further progress was made towards setting up a national intelligence database.

The police and customs hotlines are fully operational. Disciplinary measures continued to be applied to a steady number of customs and police officers for corrupt behaviour. The customs administration implemented measures to prevent and suppress corruption among customs officers. In 2008 the sector for internal control in the Ministry of the Interior brought 67 criminal charges against 75 police officers for a total of 70 criminal acts, of which 61 showed elements of corrupt behaviour. Training on the police code of ethics continued.

The State Appeals Commission for Public Procurement is operational (*See also Chapter 5*), thus providing a channel for addressing allegations of corruption in this field. The Agency for Managing Confiscation of Assets was set up. Public awareness of the right to access to public information has increased.

However, widespread corruption remains a cause for concern. Further efforts are needed to streamline the legal framework. The Law on Conflicts of Interest still has some loopholes, especially as regards its scope and the effectiveness of the control mechanism. The OECD Convention on Combating Bribery of Foreign Public Officials has not been signed. A regulatory framework laying down the status and ethical principles applicable to public officials other than civil servants is not in place. No reports on suspicions of corruption were filed by civil servants.

The legislation on financing of political parties and election campaigns remains to be effectively implemented. In particular, the reports and recommendations from the State Audit Office and the SCPC have not been followed up. So far, no sanctions have been reported for political parties which breached the rules on financing, notably as regards submission of financial reports, the threshold for election campaign expenditure and registration of donations. Since 2005 the SCPC has referred ten notifications to the public prosecutor concerning expenditure in electoral campaigns. To date there have been no prosecutions. The GRECO recommendations regarding guidelines for MPs when deciding on requests for lifting immunity have not yet been implemented.

A consistent track record on checking asset declarations has not yet been established. The anti-corruption structures, notably the Basic Prosecutor's Office for combating organised crime and corruption, the Higher Prosecutor's Offices and the anti-corruption unit within the Ministry of the Interior, need to be reinforced. Joint training of prosecutors and judges, including judges of the Supreme Court, on investigative measures and administration of evidence for cases of corruption and organised crime needs to be intensified.

The SCPC needs to make further efforts to ensure its visibility and raise the level of public trust in its independence and impartiality. It still has fully to address its remaining backlog and to reduce the duration of internal procedures.

An exercise should be conducted to identify the extent and nature of corruption in the public sector to help define practical measures to combat corruption in specific sectors. Statistics relevant to anti-corruption policy need to be further developed.

Overall, good progress was made on implementing anti-corruption policy. The electoral code, the law on financing of political parties and the law on conflict of interest were amended to strengthen transparency and new provisions on illicit enrichment were introduced. There were further indictments and convictions in high level cases and cooperation between law enforcement agencies improved. Nevertheless, corruption remains prevalent and continues to be a serious problem in many areas. Continued efforts are needed, in particular as regards implementation of the legal framework.