EU Network Against Corruption
2nd Plenary meeting - Concept Note

Introduction

The EU Network Against Corruption was established in May 2023 as part of the European Commission's anti-corruption package. It aims to develop best practices and practical guidance in various areas of common interest by bringing together all stakeholders at EU level, i.e. national authorities, practitioners, civil society, international organisations, researchers, EU agencies etc. The knowledge and good practices shared in the EU Network will support the European Commission's anti-corruption work, such as the identification of areas with high risks of corruption, and a first EU anti-corruption strategy.

At the **first plenary meeting of the EU Network on 20 September 2023**, participants were introduced to the Network and engaged in interactive discussions on good practices and trends identified in the 2023 Rule of Law Report, including the fight against corruption in seaports, the use of technology to prevent and combat corruption, education and awareness raising.

This second plenary meeting of the EU Network Against Corruption will:

1. provide an **update** of the work done by the European Commission on anti-corruption;
2. introduce and present existing **cross-border networks** active in the field of anti-corruption and integrity in the EU, in order to raise awareness and stimulate synergies;
3. offer a discussion on what good **corruption risk assessment systems** look like at national level;
4. present an assessment of which **areas (or sectors) are most at risk of corruption** in the EU;
5. exchange on **fighting high-level corruption** – focusing on success stories and strategies, including the role that civil society play in monitoring high level corruption cases.

1. Updates from the European Commission

The meeting will start with an overview of the work that the European Commission has carried out on the fight and prevention of corruption. On 24 July 2024, the European Commission published its fifth annual Rule of Law Report and the 2024 **Special** and **Flash Eurobarometer survey** on citizens' and businesses' attitudes towards corruption in the EU. The reports show developments in the area of anti-corruption in all 27 Member States and reiterate the concerns of citizens and businesses with corruption in the EU.

Further, as an outcome of the [10th Conference of States Parties to the UN Convention against Corruption](#), the Commission, the UN Office on Drugs and Crime (UNODC), the Group of States against Corruption (GRECO), and other organisations agreed on the need to launch an Anti-Corruption Partnership Forum to better coordinate activities, evaluations and joint efforts. On Wednesday 3 July 2024, the first *jour fixe* of this newly established Forum took place, co-hosted by the EU and the UNODC. The Commission will debrief participants on this meeting.

The European Commission will present and consult members **on draft Rules of Procedure** for the EU Network Against Corruption. In order to ensure that the EU Network Against Corruption meets high standards of transparency, the European Commission reminds participants about the Commission's [EU Network website](#), which serves as repository of relevant documents, such as agendas, presentations and reports of EU Network plenaries and workshops.

2. Cross-border anti-corruption networks

There are different anti-corruption networks active in the EU with the objective to fight and/or prevent corruption or an even more specific topic, such as police oversight or whistleblowing. Representatives from several of these networks will present themselves and their upcoming activities to raise awareness and stimulate synergies. These are:

The [European Partners against Corruption (EPAC) and European contact-point network against corruption (EACN)](#) are independent fora for practitioners, united in the common goal of preventing and combating corruption. EPAC is composed of anti-corruption authorities and police oversight bodies from Council of Europe member states. EACN is a formal network established by Council decision 2008/852/JHA, and brings together anti-corruption authorities from EU Member States.

The [Network of Corruption Prevention Authorities (NCPA)](#) was established in 2018 under the framework of the Council of Europe. Members to date include European and non-European state agencies in charge of corruption. NCPA focuses on systematic collection, management, and exchange of information, and the exchange of good practices. It also advocates international anti-corruption standards and supports its members in capacity building. This is complemented by the network's partnerships with other international stakeholders for the promotion of integrity.

The [European Network for Public Ethics (ENPE)](#) was founded in 2022 by the French High Authority for Transparency in Public Life. The European Network for Public Ethics brings together 12 authorities

from EU Member States active in matters of public integrity. Their missions involve maintaining the rule of law, fighting corruption and promoting good governance, which conditions citizens' trust in their public officials. These authorities ensure, within their States and under conditions of independence guaranteed by domestic law, the prevention of conflicts of interest in the public sphere and the regulation of revolving-door movements between the public and private sectors.

The [Network of European Integrity and Whistleblowing Authorities (NEIWA)](#) was established in May 2019 in The Hague. The members of NEIWA are 'competent authorities' as designated by

Directive 2019/1937 on the protection of persons who report breaches of Union law. It is composed of (currently 13) state authorities that protect and advise whistleblowers to assure the follow-up of the reporting and/or lead investigation on the reports they receive in some cases. NEIWA aims to contribute to national and European debates by using all the options offered by the Directive. Its objective is the establishment or strengthening of an effective regime for the protection of whistleblowers and, where appropriate, for the monitoring of reports, and/or the investigation of the report in particular by implementing the highest standards.

The **Internal Criminal Investigations Network (ICIN)** was established in March 2020. ICIN has its mandate within Europol and the network has currently 26 member organisations. By connecting organisations responsible for criminal investigations regarding an employee within a police organisation, the primary purpose of the network is to share methods for how to detect and investigate corruption within police organisations. ICIN also aims to enhance the public's confidence in the member organisations, the police organisations, and to Europol.

3. Assessing corruption risks at national level

Assessing corruption risks in different sectors constitutes an essential element in any public integrity strategy. The **methodology of corruption risk assessment** (CRA) entails some key elements and its core aim is to identify weaknesses for corruption in the system or processes. After the identification of corruption risks in the system or processes, an analysis of the corruption risk is carried out. The nature of the analysis comprises different tools, including assessing likelihoods, impacts, comparisons, and conducting risk matrices. Finally, the identification and analysis of corruption risks is followed by the creation of mitigation strategies and indicators for evaluating their impact.

This panel will start with an **introduction into the methodology of CRAs** by Viktoriia Poltoratskaia from the Central European University. To delve deeper into **national perspectives on corruption risk assessments**, representatives from authorities in Czech Republic, Italy and Lithuania will share experiences from their countries:

František Kučera Ministry of Justice of Czechia will present the **results and methodology** of the project "Corruption in Selected Sectors of the Czech Republic and possibilities of its Reduction". Giuseppe Busia will focus on **public procurement**, as this has been recognised as one of the areas most affected by corruption in Italy and explain the Italian digitalisation efforts over the entire procurement cycle. Domantas Lukauskas will present the Lithuanian national **corruption risk analysis**, its outcomes and subsequent efforts by the Lithuanian Special Investigation Service to work with stakeholders to foster change.

4. High-risk areas of corruption in the EU

After looking at national risk assessment methods, we will take our discussions to the EU level. Identifying and mapping areas of risk is key to effective anti-corruption action. Corruption activities are

constantly evolving and adapting to new opportunities, and patterns differ across Member States. No sector or area of activity is safe from corruption risks, but common high-risk areas deserve particular attention – usually those involving management of significant public funds or access to permits or to a critical service. Sectors such as **healthcare, construction** or urban planning are therefore vulnerable, and sudden increases in public investment can create new corruption-related risks.

Areas with a risk of high criminality such as ports, which are pressure points for **organised crime groups** trafficking drugs, also need constant monitoring. The Commission is working through the [European Ports Alliance](#) to look into the corruption risks and solutions in ports. **Sport** is another example of an area relatively recently identified as high risk, where organised crime groups seek profit through match fixing through corruption and extortion.

The European Commission committed to identify those areas that are most at risk of corruption in the EU (see the Joint Communication on the Fight against corruption in the EU of May 2023). The Commission will present its findings on high-risk areas in 2025 and the work is intended as a **key building block for a first EU Strategy Against Corruption**.

The Commission has contracted an **external study** to identify and analyse high-risk areas of corruption. As foreseen, **the EU Network Against Corruption will be consulted on this exercise** and in this meeting, you will be consulted in particular on the findings of the study. The EU Network will be interactively involved in commenting on the findings by responding to live polls on the identified high-risk areas and the possibility to (anonymously) ask questions and provide comments.

5. Success stories and strategies on fighting high-level corruption

The objective of the final part of the plenary meeting is to discuss how to pursue efficient investigation, prosecution and adjudication of high-level corruption cases, while fostering the involvement and exposure of civil society organisations (CSOs) in detecting them. Speakers will cover the main obstacles to fighting high-level corruption and share success stories as an inspiration for practitioners.

Andrey Yankulov, Senior Legal Expert at the Anti-Corruption Fund, will present how as a CSO they encourage proactive investigation of corruption practices by state institutions and how research can be carried out on suspected corruption and conflicts of interest. **Martin Ortner**, Chief Public Prosecutor in Austria, and **Macarena Arroyo**, Chief Public Prosecutor in Spain, will present examples of fighting corruption and share reflections on how to ensure an efficient track record of dealing with high-level corruption cases.