

Adoption: 2 December 2022
Publication: 22 March 2023

Public
GrecoRC5(2022)8

FIFTH EVALUATION ROUND

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

SECOND COMPLIANCE REPORT

SLOVENIA



Adopted by GRECO
at its 92nd Plenary Meeting (Strasbourg, 28 November – 2 December 2022)



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

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (top executive functions, PTEF) and law enforcement agencies (LEA)".
2. This Second Compliance Report assesses the measures taken by the authorities of Slovenia to implement the recommendations issued in the Fifth Round Evaluation Report which was adopted at GRECO's 78th Plenary Meeting (8 December 2017) and made public on 8 March 2018, following authorisation by Slovenia ([GrecoEval5Rep\(2017\)2](#)). The corresponding Compliance Report was adopted by GRECO at its 86th Plenary Meeting (29 October 2020) and made public on 5 October 2021, following authorisation by Slovenia ([GrecoRC5\(2020\)1](#)). GRECO noted that considerable progress was necessary to demonstrate an acceptable level of compliance with the recommendations and asked the Head of Delegation of Slovenia to provide a report on the progress in implementing the pending recommendations.
3. As required by GRECO's Rules of Procedure¹, the Slovenian authorities submitted a Situation Report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 19 May 2022 and served as a basis for this Second Compliance Report.
4. GRECO selected Spain (with respect to top executive functions in central governments) and Croatia (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Mercedes SÁNZ, on behalf of Spain, and Mr Krešimir SIKAVICA on behalf of Croatia. They were assisted by GRECO's Secretariat in drawing up this Second Compliance Report.

II. ANALYSIS

5. GRECO, in its Fifth Round Evaluation Report, addressed fifteen recommendations to Slovenia. In the Compliance Report, GRECO concluded that none of the fifteen recommendations had been implemented satisfactorily or dealt with in a satisfactory manner. Only recommendation iv had been partly implemented. Compliance with the outstanding recommendations is dealt with below.

Corruption prevention and promotion of integrity in respect of central governments (top executive functions)

Recommendation i

6. *GRECO recommended that the Commission for the Prevention of Corruption be provided with adequate financial and personnel resources to effectively perform its tasks with*

¹ The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised bis.

respect to persons entrusted with top executive functions, in particular in the areas of asset declarations, conflicts of interest, lobbying and integrity plans.

7. GRECO recalls that this recommendation was considered not implemented in the Compliance Report; the authorities referred to annual budgets allocated to the Commission for the Prevention of Corruption (hereafter “CPC”) and to the number of its staff. GRECO concluded that the human and financial resources continued to be routinely allocated to the CPC in a similar manner to what it was at the time of the adoption of the Evaluation Report and noted support from the Ministry of Justice to increase the resource of the CPC as a positive signal, but it could not consider the recommendation implemented even partly since the financial support had not materialised.
8. The Slovenian authorities now refer to the annual budgets allocated to the CPC for 2022 and 2023, respectively 2,345,480 € and 2,345,382 €, a slight increase compared to previous years (2020: 1,887,070 € and 2021: 2,162,770 €). In addition, the CPC’s budget in the amount of 2,467,605 € for 2023 and 2,524,293 € for 2024 is to be adopted on 1 December 2022. The authorities also point out that Article 60 of the Implementation of the Republic of Slovenia Budget for 2021 and 2022 Act allowed for an increase in the number of CPC employees by five in 2021 and another five in 2022. According to the CPC, the increase of its budget resources is mostly due to the amendments to the Integrity and Prevention of Corruption Act (hereafter “IPCA”) and its additional tasks given to the CPC (e.g. new tasks related to reporting obligations of interest groups on lobbying activities; introduction of gifts regulations, monitoring the implementation of integrity plans, etc.). As per the personnel resources, of the 46 staff members now employed as of 20 October 2022, four are now responsible for overseeing and raising awareness of integrity plans, three are tasked with verifying conflict of interest situations, three are in charge of verifying asset declarations and two are responsible for supervision as regards the rules on lobbying. The CPC also points out that the shortcomings regarding its financial resources are strictly linked to the allocation of funds to two major information systems managed by the CPC, ‘Erar’ and ‘Corruptio’, (one enabling publication of public sector financial transactions and the other used for reporting assets, lobbying contacts, gifts, business restrictions, integrity plans, etc.). To this end, the CPC received additional 60,000 € for upgrading its information systems in 2022 and additional funds in the amount of 300,000 € are foreseen for 2023 and 2024.
9. GRECO takes note of the information provided by the Ministry of Justice and the CPC. GRECO welcomes the further increase in the budget allocated to the CPC (which also appears to be the result of new tasks assigned to the CPC) and in the staff numbers, which have overall increased by 6 from 2013 until 2022, with a total of 46 people employed. GRECO is pleased that the resources to the CPC have increased and will continue to do so in the future. At the same time, GRECO is not well placed to assess the details of the precise need for various resources which obviously rests with the competent authorities to do.
10. GRECO concludes that recommendation i has been dealt with in a satisfactory manner.

Recommendation ii

11. *GRECO recommended that the shortcomings identified in the Integrity and Prevention of Corruption Act as regards the “sui generis” procedure before the Commission for the Prevention of Corruption, post-employment restriction rules, rules on lobbying and the extension of oversight to family members in case of a disproportionate increase of assets be remedied through the adoption of new or amended legislation.*
12. GRECO recalls that this recommendation was not implemented in the Compliance Report as the discussion regarding the draft text amending the Integrity and Prevention of Corruption Act (IPCA) was still pending before Parliament.
13. The Slovenian authorities now report that in October 2020 Parliament adopted amendments to the IPCA, inter alia, that the “sui generis” procedure of the CPC has been subject to an overhaul. These issues concern among other things CPC’s power to initiate the procedure which involves fact-finding, sending the concerned person a draft of the findings, their adoption and their presentation to the public, together with the response of the concerned person, its power to publish non-anonymised findings restricted to public officials as opposed to civil servants and the possibility to propose a revision to the Court of Audit. According to the authorities, the amended text also allows for the CPC to follow, *mutatis mutandis*, general administrative procedures.
14. The authorities also indicate that the IPCA amendments have broaden the post-employment restrictions applicable under the IPCA on lobbying and business operations and introduce reporting to the CPC by interest groups on lobbying contacts. The amended IPCA has also been complemented with a manual providing explanation to IPCA provisions on lobbying which clarifies its definition and distinguishes lobbying from advocacy. Moreover, IPCA, as amended, extends the supervision of high officials’ property to members of their family when a disproportionate increase of wealth has been found.
15. GRECO takes note of the information provided by the authorities and welcomes that the IPCA has been extensively amended in respect of the areas covered by this recommendation. The rules of procedure of the CPC (“sui generis”) have been amended, post-employment restrictions have been widened, lobbying has been more clearly defined and the regulations been widened. It is also to be welcomed that CPC’s oversight in respect of public officials may now be extended to the official’s family members in case a disproportionate increase of assets has been detected. GRECO welcomes the amendments of the IPCA as well as the complementary regulations and practice explained by the authorities which are compliant with the intentions of the recommendation.
16. GRECO concludes that recommendation ii has been dealt with in a satisfactory manner.

Recommendation iii

17. *GRECO recommended that an integrity plan be established in respect of the government, as an overarching structure to the plans existing in each ministry.*

18. GRECO recalls that this recommendation was not implemented in the Compliance Report. The Slovenian authorities expressed that an integrity plan for the government would not be feasible nor desirable as it would not be compatible with the respective integrity plans already in place for each ministry.
19. The authorities now report that safeguards against risks of unethical or corrupt behaviour of the Government as a whole, as well as of its individual members, are provided in the provisions of the IPCA (e.g. on the conduct regarding a potential conflict of interest, restriction of carrying out additional activities, declaring and managing of gifts received in connection with the exercise of official duties, declaration of assets, lobbying etc.). The authorities reiterate that the responsibility of the Government officials is primarily political, and in case of breach of integrity rules, the CPC has the powers to take action. It is the authorities' position that consequences of violations of such rules cannot be defined in the integrity plan, or the code of ethics, but are rather reflected in the political responsibility. The authorities also add that that a Guide to the Obligations of High Officials has been aligned to the content of the amended IPCA (2020) and distributed to the new members of the government.
20. GRECO takes note of the information provided by the Slovenian authorities. While welcoming the distribution of a renewed Guide to the Obligations of High Officials based on the amended IPCA, GRECO regrets that what is requested by the recommendation, i.e. a dedicated overarching integrity plan for the government, in addition to the integrity plans of each ministry, has not been established. Obviously, such a plan would need to build on the IPCA.
21. GRECO concludes that recommendation iii remains not implemented.

Recommendation iv

22. *GRECO recommended developing efficient internal mechanisms to promote and raise awareness of integrity matters in the government, including confidential counselling and training at regular intervals of persons entrusted with top executive functions.*
23. GRECO recalls that this recommendation was partly implemented in the Compliance Report. Several efforts had been made to raise the awareness of integrity matters, including through information sessions, dissemination of materials and making relevant rules and guidelines public via the Internet/Intranet. However, the participation of the PTEFs in information meetings on integrity matters was low and no real measures aiming at developing an efficient internal mechanism to promote and raise awareness of integrity matters in the government had been taken. Also, no training at regular interval had been established and no new measures in respect of promoting confidential counselling had been reported.
24. The Slovenian authorities now report that the Ministry of Public Administration continues to organise events and publications as awareness-raising measures, together with training of high officials and support in the context of ethical dilemmas. In February 2022, the CPC revised a guide for office holders in the Government and ministries which provides information on the code of ethics for members of the Government, rules on conflict of interest, incompatibilities, gifts, lobbying, assets declarations and business

restrictions, including PTEFs. This guide is regularly disseminated among the Government's office holders. The CPC developed an information package on integrity matters that has been shared with the newly elected members of the Government in May 2022. Also, in 2020, 2021 and 2022 a total of 7 trainings on IPCA and rules pertaining to PTEFs have been carried out by the CPC.

25. GRECO takes note of the information provided by the authorities. It would appear that the efforts to promote and raise the awareness of integrity matters, including through information sessions and dissemination of materials have continued and even increased. Moreover, the CPC has launched an on-line information package for PTEFs as a systematic mechanism to promote and raise the awareness on integrity-related matters. That said, nothing new has been reported on confidential counselling available to PTEFs. Therefore, GRECO cannot consider that this recommendation has been implemented more than partly.
26. GRECO concludes that recommendation iv remains partly implemented.

Recommendation v

27. *GRECO recommended ensuring that all contacts of persons entrusted with top executive functions with lobbyists and other third parties who seek to influence government decision-making are duly reported, including those from legal and authorised representatives of companies and interest groups.*
28. GRECO recalls that this recommendation was not implemented in the Compliance Report. GRECO noticed that no information had been provided as to any developments regarding the registration of lobbyists (71 were registered at the time of the on-site visit, while there were between 100 and 300 active lobbyists *de facto* in Slovenia). Apart from the information meetings conducted by the CPC in 2019 (one of which was attended by PTEFs), the authorities reported no significant measures to raise the awareness of the rules on lobbying among the PTEFs. Also, no information had been provided as regards measures to broaden the narrow definition of lobbying, which left third parties to a large extent out of the scope.
29. The Slovenian authorities reiterate that the existing awareness-raising initiatives are aimed at regular and correct reporting of PTEFs on their contacts with lobbyists. They also inform that the efforts to address the reporting of contacts with lobbyists will be reflected in the new Government's programme to raise integrity and transparency which has been drafted by the Ministry and the CPC and is planned for adoption by December 2022.
30. In addition, the CPC reiterates its role in cross-checking all records of contacts with lobbyists made by lobbied persons with reports made by registered lobbyists or interest groups. To the lobbyists and interest groups who failed to report on lobbying activities (481 interest groups and 36 registered lobbyists), the CPC formally requested to provide such reports and solicited 283 interest organisations to fulfil their obligation to provide yearly reports on lobbying activities made in the previous years. Until now, 4 requests for clarifications of lobbying contacts have been sent out to lobbyists and interest organisations as well as lobbied persons because the reported content did not match.

31. The authorities also reiterate that the 2020 Amendments to the IPCA provide a new obligation for legal and authorised representatives of companies and interest groups to report lobbying contacts to the CPC.
32. GRECO takes note of the information provided concerning a variety of measures taken to raise awareness on the obligation to register PTEFs' contacts with lobbyists and to report lobbying. While these measures go in the right direction, some of them still remain to be implemented in practice and GRECO cannot conclude that this recommendation has been dealt with more than partly. The authorities are urged to continue their efforts. GRECO also notes that the narrow definition of lobbying, excluding third parties to a great extent, remains unchanged.
33. GRECO concludes that recommendation v has been partly implemented.

Recommendation vi

34. *GRECO recommended developing within the government an organisational strategy and practices to improve the management of conflicts of interest, including through responsive advisory, monitoring and compliance mechanisms.*
35. GRECO recalls that this recommendation was not implemented in the Compliance Report as the Slovenian authorities did not report any specific measures or developments relevant to the implementation of this recommendation.
36. The Slovenian authorities have not reported any new measure taken with regard to this recommendation. They reiterate that the current mechanisms and practices, where office holders can request advice on integrity issues by contacting the CPC and by making use of the Government's website are effective in managing conflicts of interest.
37. GRECO concludes that recommendation vi remains not implemented.

Recommendation vii

38. *GRECO recommended considering widening the scope of asset declarations to also include information on the spouses and dependent family members of ministers and state secretaries (it being understood that such information would not necessarily need to be made public).*
39. GRECO recalls that this recommendation was not implemented in the Compliance Report. The Ministry of Public Administration reported that the authorities have agreed that the current regulations on mandatory reporting of assets did not need to include information on spouses and dependent family members. On the other hand, the CPC expressed its concerns that no joint consideration had effectively taken place.
40. The Slovenian authorities now inform GRECO that during the drafting of the amended IPCA, the bill was sent for inter-ministerial and expert consultation to more than 20 private and public sector organisations and none of the parties involved suggested

widening the scope of declarations to include information on spouses and dependent family members.

41. GRECO takes note of the information provided. It notes that a broad range of stakeholders have been involved in consultations in the drafting of the amended IPCA, and understands that the issue of the current recommendation has been discussed at governmental level within the framework of amending the law (IPCA). While regretting the outcome, GRECO accepts that this matter has been duly considered as required.
42. GRECO concludes that recommendation vii has been dealt with in a satisfactory manner.

Recommendation viii

43. *GRECO recommended (i) ensuring timely publication of the ministers and state secretaries' asset declarations and (ii) that substantive checking of these asset declarations be carried out by the Commission for the Prevention of Corruption.*
44. GRECO recalls that this recommendation was not implemented in the Compliance Report. While some legislative amendments were planned to enhance the transparency of asset declarations, they did not address the timing of publication of such declarations. As to the second part of the recommendation, no new measures had been reported to ensure substantive checking of asset declarations by the CPC.
45. The Slovenian authorities now report that the amendments to the IPCA include new provisions regulating asset declarations, such as the obligation to publish reported changes in assets, as filed by PTEFs. Previously all data on income and assets was to be publicly available. In this regard, a joint meeting between the Ministry of Justice, the CPC and the Information Commissioner took place in May 2022, yet no tangible progress has been reported concerning timely publication of ministers and state secretaries' asset declarations. As already mentioned in the previous compliance report, according to the amended IPCA, all data on changes in assets declarations should be published within 30 days at the latest from its receipt. Concerning part (ii) of the recommendation, the CPC informs that it verified assets of 4 PTEFs in 2020 and 2021 and that it continued to systematically check timeliness of asset declarations in 2022.
46. GRECO takes note of the information provided by the authorities. As stressed by the CPC, the amended IPCA now only allows publication of changes in assets as opposed to all information on assets reported previously. GRECO regrets that no measures have been reported to ensure substantive checking of asset declarations by the CPC, which are only checked in terms of their timely submission and formal regularity of declarations forms. However, it welcomes the establishment of time limits for publication. It follows that GRECO cannot consider this recommendation fully implemented.
47. GRECO concludes that recommendation viii has been partly implemented.

Recommendation ix

48. *GRECO recommended publishing information about the outcome of violation procedures undertaken under the Integrity and Prevention of Corruption Act in respect of persons entrusted with top executive functions.*
49. GRECO recalls that this recommendation was not implemented in the Compliance Report since the legislative amendments that would allow publishing information about violations of the IPCA had not been adopted.
50. The Slovenian authorities now report that, according to the newly introduced provision of IPCA, the CPC may publish information about the outcome of violation procedures undertaken under IPCA in respect of PTEFs. The publication shall contain the details of the person concerned, the violation and the sanction imposed and should be available on the website for five years.
51. GRECO notes that the amendments to the IPCA allow publishing information about violations of the IPCA in respect of PTEFs. GRECO is satisfied that the amended regulation meets the requirements of the recommendation.
52. GRECO concludes that recommendation ix has been implemented satisfactorily.

Corruption prevention and promotion of integrity in respect of law enforcement agencies

Recommendation x

53. *GRECO recommended (i) enhancing risk management within the police, by further developing an intelligence collection plan to identify corruption problems and emerging trends, coupled with a regular assessment mechanism, which is adequately resourced, and aims at reducing or eliminating the identified risks; (ii) strengthening public reporting tools on integrity and corruption prevention measures in the police.*
54. GRECO recalls that this recommendation was not implemented in the Compliance Report since the drafting of the amendments to the Organisation and Work in the Police Act that would make it possible to develop an intelligence collection plan was at an early stage. GRECO did not receive information as regards the strengthening of public reporting tools on integrity.
55. The Slovenian authorities now report that the amendments to the Organisation and Work in the Police Act were adopted on 29 October 2021 and entered into force on 13 November 2021. With these amendments, the police has acquired a legal basis for managing and maintaining the records including data on gifts, additional work and supplementary activities, conflicts of interest, non-public contacts or lobbying. The amendments, according to the authorities, strengthen the intelligence gathering system to detect corruption risks and emerging trends that affect police's integrity. The activities to establish such records have already started and are included in the work plan 2022. Regarding the second part of the recommendation, the authorities submit that a website will be developed at the same time as the recording mechanism is established.
56. GRECO welcomes the amendments to the Organisation and Work in the Police Act which put in place an intelligence collection plan to identify corruption problems and emerging

trends, coupled with the intention to develop a regular assessment mechanism and, consequently, the development of reporting tools on integrity and corruption prevention measures in the police. However, given that the system is not yet operational, GRECO can only consider this recommendation as partly complied with.

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

Recommendation xi

58. *GRECO recommends strengthening the existing mechanisms for career promotion and dismissal in the police in order to ensure that they are fair, merit-based and transparent, including abandoning the practice where the supervisor decides on this single-handedly. Particular attention should be paid to the recruitment and integration of women at all levels in the police structure.*
59. GRECO recalls that this recommendation was not implemented in the Compliance Report as the reform process with the aim of improving the career system within the police had only been initiated. GRECO noted that some steps had been taken towards promoting the profession of a police officer among women, although these were only at an early stage.
60. The Slovenian authorities reiterate that existing civil service legislation on promotions and dismissal provides mechanisms that ensure fairness, merit and transparency. As regards the reform of the promotion system in the police, the authorities point out that the working group, together with the Government negotiation group, continued to work on the implementation of its proposals and its tasks were extended to 31 December 2021.
61. The authorities also report that a task force for the development of a competency model was established in March 2021, setting up a project called “Development of a Competency Model in the Police” that lasted one year. This included, *inter alia*, organising and delivering training for competency assessors and the production of a handbook titled ‘Competency Model in the Police’. The project conclusions are expected to be presented to the Director General of the Police. The authorities also reiterate that the practice of dismissals of police officers where the supervisor decides single-handedly has been abandoned as the Division of Development and Systemic Tasks and the Division of Internal Investigation and Integrity actively comment on the dismissal procedure.
62. Regarding recruitment and integration of women at all levels in the police structures the authorities report that there have been no legislative changes so far but that the number of women in the police force has increased².
63. GRECO takes note of the information provided. The ‘Competency Model in the Police’ could be a valuable tool to strengthen the mechanisms for career promotion and dismissal and to ensure a fair, merit-based and transparent procedures. However, this

² GRECO notes that according to the data submitted by the authorities only 26.68% of the highest posts by grade (with university education) of the Police force in 2022 is fulfilled by women, as opposed to 99.39% for the employees with no completed primary education. Moreover, 8% is the percentage of women in management positions (2022).

initiative has still to be fully taken on board by the Directorate General of the Police. Moreover, while GRECO welcomes the practice that excludes a single-handed decision on dismissal, it regrets that this is still not the case for promotions. Concerning gender representation, GRECO welcomes an increase in the number of women in the police force. Some progress, however limited, has thus been achieved.

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

Recommendation xii

65. *GRECO recommended developing an organisational strategy and practices to improve the management of conflicts of interest in the police, including through responsive advisory, monitoring and compliance mechanisms.*
66. GRECO recalls that this recommendation was not implemented in the Compliance Report as the draft legislative amendments that would potentially address the recording of conflict of interest were at a very early stage and no steps appeared to have been taken to put in place an organisational strategy for better management of conflicts of interest through advisory, monitoring and compliance mechanisms.
67. The Slovenian authorities now report that the establishment of a register of conflicts of interest will better support the implementation of the provision referring to police officer's duty to act in response to any circumstances which might constitute a conflict of interest. The Internal Investigation and Integrity Division of the Service of Director General of the Police will be informed through a direct notification system of each entry of a new case in the register and of corresponding hierarchical decisions on required actions.
68. GRECO takes note of the intention to establish a register of conflicts of interest that is monitored by the Internal Investigation and Integrity Division with the aim of identifying also potential systemic risks. However, in order to consider this recommendation implemented the register of conflicts of interest needs to be fully operational and consolidated, together with a responsive advisory, monitoring and compliance mechanism. For this reason, GRECO cannot consider this recommendation implemented, even partly.
69. GRECO concludes that recommendation xii remains not implemented.

Recommendation xiii

70. *GRECO recommended (i) clearly defining a reporting obligation for secondary employment that is sufficiently robust to address individual risk and organisational reputation; and (ii) ensuring that all authorisations of secondary employment are registered.*
71. GRECO recalls that this recommendation was not implemented in the Compliance Report as the draft legislative amendments that would potentially address the reporting obligation for secondary employment and the registration of the activities authorised had not been adopted.

72. The Slovenian authorities report that, as of 13 November 2021, the amended Organisation and Work of the Police Act entered into force. This envisages the introduction of mandatory notification to the Director General of the Police of any secondary work or activity, in which a police officer is engaged, or intends taking up. The reporting obligation also applies to scientific or pedagogical work, work in cultural, artistic, sporting, humanitarian and other similar associations and organisations, or work in the field of journalism. A police officer may engage in secondary employment or gainful activity on the basis of a written consent of the Director General of the Police. Such consent shall not be given if the intended secondary employment or gainful activity would hinder the officer in performing his or her police tasks, damage the reputation of the police, or result in a conflict of interests. Also, the amended act provides the obligation for the police to keep a register of secondary employment and activities. This shall contain information concerning the legal act providing a basis for a police officer to engage in secondary employment, as well as information concerning the decision-making process and the authorisation.
73. GRECO takes note of the information provided by the authorities and welcomes the legislative changes that ensure a reporting obligation for secondary employment that addresses risks of conflicting interests and organisational reputation, together with an obligation to maintain a register on secondary employment by the authorities.
74. GRECO concludes that recommendation xiii has been implemented satisfactorily.

Recommendation xiv

75. *GRECO recommended developing specific mechanisms for preventing and managing conflicts of interest after officers leave the police organisation.*
76. GRECO recalls that this recommendation was not implemented in the Compliance Report as no tangible results had been achieved to implement it.
77. The Slovenian authorities now present the findings of their benchmarking process in order to seek advice on good post-employment practices from other EU states. Slovenia's provisions on the temporary prohibition of private detective services (for two years) are similar to those of Belgium, while Denmark and Germany only stress that after leaving their post, police employees have to adhere to general legal principles (e.g. confidentiality).
78. Based on the input from the member states, the authorities report that the Slovenian legislation does not differ from other EU states inasmuch as it focuses on the post-employment duty of confidentiality.
79. GRECO takes note of the information provided by the authorities. While it welcomes the authorities' initiative to seek advice from other EU members, it notes that each country is to be assessed on its own merits. Unless the authorities can show that there is no need for this recommendation in Slovenia, GRECO cannot conclude that the measures taken are sufficient.

80. GRECO concludes that recommendation xiv remains not implemented.

Recommendation xv

81. *GRECO recommended (i) resorting to a more systemic use of the multiple-eye principle, whenever possible, and (ii) strengthening the protection of whistle-blowers and making sure that all officers are well informed of the available channels to report wrongdoing in the workplace.*

82. GRECO recalls that this recommendation was not implemented in the Compliance Report as very little had been done to effectively address the problems underlying it.

83. The Slovenian authorities reiterate that corruption risks in Slovenia have been identified exclusively during road traffic policing procedures and border check procedures. In both cases, the authorities point out that the current system is suitable to mitigate corruption risks and take appropriate measures. In addition, the authorities indicate that new video-surveillance system had been installed in order to better reconstruct border check procedures. Nonetheless, they point out that the procedure is carried out by one police officer, which could entail a higher risk.

84. As to the second part of the recommendation, the authorities indicate that a ‘Systemic Act on Protection of Whistleblowers’ was agreed by the Government on 19 October 2022 and is currently pending before Parliament. The draft act aims at transposing into law the EU Directive 2019/1937 on the protection of persons who report breaches of Union law, also covering reporting wrongdoing in the police. The Act also provides for awareness raising activities regarding the protection of whistleblowers and the reporting channels available.

85. GRECO takes note of the information provided by the authorities. While it welcomes the initiatives to compensate for the scarce use of the “multiple-eye principle”, it cannot conclude that substantial steps have been taken in this regard. Concerning the second part of the recommendation, GRECO welcomes that the ‘Systemic Act on Protection of Whistleblowers’ has been agreed by the government and is currently pending before Parliament. This is a step clear step forward.

86. GRECO concludes that recommendation xv has been partly implemented.

III. CONCLUSIONS

87. **In view of the foregoing, GRECO concludes that Slovenia has implemented satisfactorily or dealt with in a satisfactorily manner five of the fifteen recommendations contained in the Fifth Round Evaluation Report.** Six recommendations have been partly implemented and four have not been implemented. More specifically, recommendations i, ii, vii, ix and xiii have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations iv, v, viii, x, xi and xv have been partly implemented and recommendations iii, vi, xii and xiv have not been implemented.

88. As regards persons entrusted with top executive functions (PTEFs), some progress has been achieved, in particular, as a result of the amendments to the Integrity and Prevention of Corruption Act (IPCA). Further efforts have been made to raise awareness of integrity matters; strengthening rules on post-employment restrictions and lobbying; widening the scope of asset declarations to include spouses and dependent family members when there is a disproportionate increase of assets; publishing declaration of assets and violations. However, considerable efforts are still needed, such as adopting an overarching integrity plan of the Government and an operational system to manage and monitor conflicts of interest.
89. As regards law enforcement agencies (LEAs), some limited efforts have been noticed. Legal amendments have been adopted to the Organisation and Work in the Police Act to improve risk management by further developing intelligence collection to identify corruption-related problems. A system for reporting, registering and monitoring secondary employment has been established. Development of the management of conflicts of interest through advisory, monitoring and compliance mechanisms (during and after employment) is still at an early stage. Progress is also still lacking in de facto ensuring that promotions in the police, including top officials, are fair, merit-based and transparent. New legislation on whistleblowing is underway.
90. In view of the above, GRECO concludes that Slovenia is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report in the meaning of Rule 31 revised bis, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of Slovenia to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations iii, iv, v, vi, viii, x, xi, xii, xiv and xv) as soon as possible, however – at the latest – by 31 December 2023.
91. Finally, GRECO invites the Slovenian authorities to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.