**THE SECOND JOINT INTERIM IMPLEMENTATION REPORT ON THE PROGRAMME OF THE GOVERNMENT OF THE REPUBLIC OF SLOVENIA TO ENHANCE INTEGRITY AND TRANSPARENCY IN THE PUBLIC SECTOR FOR 2023–2026 PERIOD**

**(FROM 1 SEPTEMBER 2023 TO 29 FEBRUARY 2024)**

1. **SUMMARY**

By adopting its programme to enhance integrity and transparency in the public sector for the 2023–2026 period (hereinafter: the Programme) on 9 February 2023, the Government of the Republic of Slovenia (hereinafter: the Government) demonstrated its focus on and determination to enhance the integrity and transparency in the public sector. The measures set out in the Programme are to be completed over a four-year period. A shorter deadline may be set for each measure, depending on its purpose and the activities needed therefor, and the implementing authorities are required to report semi-annually on the measures’ implementation. The Ministry of Public Administration was designated as the coordinator of activities related to the above, as well as to produce semi-annual and final reports on the Programme’s implementation. On 9 November 2023, the Government took note of the First Joint Interim Implementation Report on the Programme for the period from 1 March 2023 to 31 August 2023.[[1]](#footnote-2)

For the second joint interim report for the period from 1 September 2023 to 29 February 2024, which is the subject of this document, the ministries identified in the Programme as implementing authorities reported to the Ministry of Public Administration on its implementation. According to their reports, activities supporting the permanent measures included in the Programme are being carried out continuously and actively. These include measures aimed at raising awareness among public employees employed in the judicial system and those employed in other public sector entities, especially in areas considered more risky from the viewpoint of integrity, such as public procurement procedures. A total of 108 participants attended the training courses at the Administrative Academy of the Ministry of Public Administration on Integrity and Ethics and 95 participants attended the training course on Managing Corruption Risks in Public Procurement; the Ministry of the Interior reported a total of 69 participants in training sessions, the Judicial Training Centre reported 74 participants in training sessions, and the Ministry of Finance, Slovenian State Holding reported more than 600 participants in compliance and integrity training sessions.

Some measures were completed in the second reporting period. These are the measures implemented by the Ministry of the Environment, Climate and Energy. Regarding Measure 3a.4a Enabling public oversight over the values of the limiting factors determined by law (values of noise levels, bad odours, the presence of impurities), the Ministry reported that the Environment Agency of the Republic of Slovenia (hereinafter: ARSO) publishes data from strategic noise maps, which show an overview of environmental noise pollution in individual areas, or an assessment of the population's exposure to noise due to the various noise sources. Air quality data as well as water quality data are published on the website (Environmental Atlas). Regarding the other completed measure, 3a.4c Transparent and up-to-date publication of data on the change in the emission limit values and environmental quality standards, the Ministry reported that all draft regulations are published on e-democracy, so that the public is informed at an early stage of the regulations’ formulation and has the opportunity to comment on possible changes to emission limit values and environmental quality standards.

For other measures under the Programme that have not yet been completed, activities have commenced or are continuing, at least to some extent, in the manner foreseen to achieve the intended objective as reflected in the description of each measure. Three ministries propose extending the deadlines for the implementation of the measures, so the deadlines in the Programme in points 3A.2a Establishment of publicly accessible records and publications and identification of supervisions of public-private partnerships, and 3A.2b Measures in healthcare, implemented by the Ministry of Health, are extended until July 2024; while the deadline in point 3Ba Study of the applicable regulation and practice for the performance of permitted activities of officers and the establishment of uniform regulation and implementation, implemented by the Ministry of Public Administration, is extended until the first half of 2025.

The measure included in the Programme as an unfinished measure under the Programme of the Government of the Republic of Slovenia to enhance integrity and transparency 2017–2019 “2.b The systemic regulation of or amendments to the regulation of the operation and funding of disability, humanitarian and sports organisations with a view to eliminating corruption risks and risks of uneconomic use of funds” will continue to be implemented by the Ministry of Economy, Tourism and Sport in cooperation with the Ministry of Finance and the Commission for the Prevention of Corruption (hereinafter: the CPC). Following the change of the implementing authority due to changes in responsibilities between ministries following the amendment of the systemic regulation, activities have not yet started or are not yet continuing. The measure and its implementation are included in Chapter 3. NEW MEASURES, under measure 3Č on the functioning and funding of disability, humanitarian and sports organisations, or 3Č.a on the systemic regulation of or amendments to the regulation of the operation and funding of disability, humanitarian and sports organisations, by setting a new deadline for the implementation of the measure, foreseen for the end of 2024 or early 2025.

1. ***PERMANENT MEASURES IN THE PUBLIC SECTOR:***

***1a***

***Training for public employees and public office holders in state authorities, local community administrations and other bodies governed by public law.***

**Institution responsible:** Ministry of Public Administration

**The purpose and objective of the measure:** Depending on the needs of various ministries and target groups, trainings in the field of integrity and transparency in the public sector will be carried out, with an emphasis on the daily effort to achieve the personal integrity of the individual.

**Objective:** A better knowledge of how to properly respond and behave in the public sector in situations related to conflicts of interest, gifts, lobbying, ancillary activities, and incompatibilities, as well as a high level of awareness of the integrity and responsible management of public funds.

**Indicators:** the number of trainings carried out by individual target groups, number of participants in trainings.

Rapporteur: Ministry of Public Administration – Administration Academy:

**Implementation of the measure:**

The following training sessions were held during the reporting period:

1. Workplace Integrity in the Public Sector – 4 sessions – 71 participants

2. Integrity, Ethics and Anti-Corruption – 1 session – 16 participants

3. Human Rights and Integrity – 1 session – 21 participants.

A total of 6 training sessions on integrity were held, attended by a total of 108 participants.

**Ad1) Workplace integrity in the public sector:**

Target group: public sector employees and members of public sector management and/or supervisory bodies to identify and prevent risks of corruption, conflicts of interest and other unethical behaviour in the performance of public duties.

**Ad2) Integrity, ethics, and anti-corruption (Modern management)**

Target group: managers at all levels (from top management to heads of sectors, departments, offices, and other internal organisational units, as well as project managers) working in state administration bodies, other state bodies and local authorities.

Objectives: organisational culture, ethics and human rights, familiarisation with the Integrity and Prevention of Corruption Act.

**Ad3) Human Rights and Integrity** (Administration Management Training):

Target group: employees working in state and local government.

The training is one of the 10 modules of the compulsory Administration Management Training programme, which is aimed at the most senior public employees.

The objectives of the training module include:

* ethics of leadership and decision-making in public administration;
* organisational culture, ethics and human rights;
* familiarisation with the Integrity and Prevention of Corruption Act.

All three training modules were co-financed by the Republic of Slovenia and the European Union from the European Social Fund, under the Effective Human Resources Management project.

Rapporteur: Ministry of the Interior

**Implementation of the measure:**

The Police held the following two training sessions from 1 September 2023 to 29 February 2024:

* 17 October 2023 – Training of criminal police officers on integrity in sport, attended by 10 police officers and
* 19 October 2023 – Training of criminal police officers specialised in commercial crime in the detection of corruption offences, integrity in law enforcement and the implementation of whistleblower protection procedures, attended by 37 police officers.

As part of their regular training, municipal police officers also receive training in ethics and integrity (2 hours). During this period, 22 municipal police officers attended training.

**ACTIVITIES ARE IN PROGRESS**

***1b***

***Broadly raising the awareness of judicial authorities and within judicial professions in relation to ensuring ethics and integrity***

**Institution responsible:** Ministry of Justice

**The purpose and objective of the measure:** The Centre for Judicial Education (CIP) has already extended training programs for judicial staff in the field of ethics and integrity to training modules for court staff, staff in public prosecutor's offices and public prosecutor's offices, as it is important that all participants in judicial proceedings – regardless of their level of activity – become aware of and become receptive to these contents. It is necessary to be aware of the necessity of constant and timely raising awareness among future judges, public prosecutors, state attorneys, attorneys, attorneys, and other lawyers. Following the example of the "Ethics and Integrity" workshops for judges, which discuss open issues in this area and are well received and well attended, the same model of workshops will be offered to public prosecutors. It will begin with training for judicial assistants, where one of the topics will be professional ethics. The same substantive update of the preparatory seminar for practitioners in insolvency and compulsory arrangement proceedings is also envisaged, as well as the seminar for bailiffs. In addition to the above, individual schools (i.e. broader education dedicated to one legal profession) have individual lectures aimed at a broader reflection on the legal professions, their functioning and responsibility towards society.

**Objective:** to raise awareness of ethics and integrity among all judicial staff and all participants in judicial proceedings, regardless of their level of operation.

**Indicators: -** the number of trainings carried out by individual target groups,

* number of participants in trainings.

Rapporteur: Ministry of Justice

**Implementation of the measure:**

* In September 2023, the Judicial Training Centre held a professional training programme for courts’ presidents and directors, as well as one for the leading position at the Public Prosecutor's Office. The seminar’s aim was to present the content in accordance with the Rules on the curriculum and the duration of the professional training programme for courts’ presidents and directors and the Rules on content and duration of Programme for leading position. The seminar was attended by 15 participants. During the training session, a representative of the CPC gave a lecture on integrity and risk factors in courts and prosecutors' offices; a lecturer – a judge – presented a lecture entitled Personal, ethical and legal assumptions about judges’ independence. Further, a district public prosecutor gave a lecture on personal, ethical and legal assumptions of the independence of a public prosecutor.
* In October 2023, the Judicial Training Centre held a seminar for judicial trainees and candidates who are to sit the legal state examination on the basis of Article 19a of the State Law Examination Act and Article 14 of the Rules on the programme for judicial traineeships and the state law examination. The seminar was attended by 16 participants.
The lecturer – a judge – used real case studies to present the legal basis and the basics of the establishment and work of the Ethics and Integrity Commission, the risk factors in the legal profession in courts, public prosecutors' offices and attorney’s office.
* On 12 October and 9 November 2023, the Judicial Training Centre organised a two-day workshop entitled "Prudent Assertiveness in Interpersonal Conflicts" as part of the advanced training seminars for enforcement officers, which are compulsory forms of training for enforcement officers in accordance with the Rules on educational training and on the programme, conditions and manner of performing exams for enforcement officers. In the workshop, the selected provider discussed with the participants the issues of working with people and, in this context, ways of adapting work to different types of clients or interlocutors: with self-control and prudence, social strength and integrity. The workshop on 12 October 2023 was attended by 22 participants and the workshop on 9 November 2023 by 21 participants.

**ACTIVITIES ARE IN PROGRESS**

***1.c***

***Raising awareness to increase the integrity and the transparency of the actions of representatives of the state in the supervisory bodies of business entities that are majority state-owned or in which the state has a controlling influence.***

**Institution responsible:** Ministry of Finance

**The purpose and objective of the measure:** In cooperation with the SDH and in cooperation with the Ministry of Finance, the Ministry of Finance and the CCP, the Ministry of Agriculture and the Chamber of Commerce has prepared training programs for members of supervisory boards in state-owned companies or under the dominant influence of the state, as well as for members of supervisory bodies in public institutions appointed by the state. The programs shall be designed after coordination among stakeholders, considering any programs of similar training in relation to similar content. Appropriate training on integrity, transparent use of public funds and prevention of corruption risks is important for these persons to transfer knowledge to other members of these bodies, disseminate knowledge and good practices from the point of view of integrity.

**Objectives:** Raising awareness and disseminating knowledge and good practices in terms of integrity and prevention of corruption risks, as well as proactive action regarding transparency also in the business environment to limit integrity violations and corruption in the wider public sector.

**Indicators:**

* training programmes.
* trainings carried out.

Rapporteur:Ministry of Finance

**Implementation of the measure:**

* From 1 September 2023 to 29 February 2024, SSH held training sessions for members of supervisory boards, members of management boards and other decision-makers in companies with state-owned assets. The topics covered were important for companies to perform well, which is a key objective of organising training sessions. Each of them touches on ethics and integrity in its own way, and some of the events organised in cooperation with the CPC have focused on this very topic.
* Training session: Practical challenges in public procurement from a compliance and integrity perspective, 19 October 2023. The aim of the training session, which was put together by SSH in cooperation with the CPC, was to broaden and deepen knowledge and, in particular, experience in this area through concrete practical examples, and to shed light on public procurement, especially from the point of view of integrity, compliance and other related aspects. It brought together experts in the field and representatives of companies with state-owned assets to analyse practical examples and discuss possible solutions. The public procurement process ensures that companies with state-owned assets acquire the goods and services necessary for the effective performance of their strategic tasks in an economic, efficient and transparent manner. More than 120 participants attended the training session live and 72 more of them followed it on Zoom. More information on the event is available on the SSH website.
* Training session: Creating a positive corporate culture: opportunities and challenges in governance, 31 January 2024. In January 2022, SSH published a Handbook on Corporate Culture Governance[[2]](#footnote-3) and last May it also developed general recommendations and expectations in this regard. The recommendations refer to the fact that a company's corporate culture should be managed and developed in a way that promotes the achievement of the company's objectives and supports the company's strategy. Corporate values should be embedded in all functions and processes at all levels of the business and translated into expected employee behaviours, supported by regular and consistent communication, including through a code of ethics/conduct, and embedded in all recruitment processes, incentive, and employee reward mechanisms. The event also provided examples of good practices of companies with state-owned assets in demonstrating selected values in practice. It also demonstrated the use of an ethical navigation wheel, which helps in systematically approaching dilemmas, decision-making and guidance in situations requiring ethical judgement. Training leaders to deal effectively with the ethical and moral challenges of their professional roles is crucial, especially in the management of companies with state-owned assets. Just under 130 participants attended the event live, and another 55 tuned in via Zoom. More information is available on the SSH website.
* Training session: Integrity in Practice, 14 February 2024. SSH organised the training in cooperation with the CPC.
* In December 2023, the SSH adopted a revised Code of Corporate Governance for companies with state-owned assets[[3]](#footnote-4) and upgraded Recommendations and Expectations of the SSH, which were also updated in the part related to strengthening integrity and compliance in companies with state-owned assets. This area is strengthened through a dedicated post or function of compliance and integrity officer appointed by the company's management with the prior approval of the supervisory board. The recommendations also go on to identify areas of risk that should be covered in more detail (risks and measures in the areas of procurement, conflicts of interest, receipt of gifts, insider dealing, lobbying, recruitment, etc.). Strengthening compliance and integrity is also gaining in international importance, most recently through the European directives on sustainable business and ESRS reporting. The training session offered concrete guidance on designing integrity systems in companies and building a culture of integrity through selected tools. It also addressed the specific integrity breaches dealt with by the CPC and the recommended actions to address them. Companies with state-owned assets were also invited to present concrete examples of good practices in the implementation of procedures for the prevention, detection and management of integrity and corruption risks, as well as in the regulation of compliance and integrity. The event was attended live by 110 participants, and another 105 participants via Zoom. More information on the event is available on the SSH website.

**ACTIVITIES ARE IN PROGRESS**

**1.d**

**Enhancing integrity and transparency in public procurement procedures**

**Institution responsible:** Ministry for Public Administration

**The purpose and objective of the measure:** Greater transparency in public procurement redress procedures. The measure is complementary to the action on the training of civil servants working in the field of public procurement.

**Objectives:** To increase the transparency and effectiveness of public procurement and audit procedures and to increase the efficiency and effectiveness of the use of public funds, through joint public procurement and open public data.

**Indicators:**

* training programmes.
* trainings carried out.

Rapporteur:Ministry of Public Administration – Administration Academy

**Implementation of the measure:**

* A total of five training sessions on "Public Procurement and Corruption Risk Management" were held, attended by a total of 95 participants.

Target group: employees working in state and local government.

The training module was aimed at public sector employees involved in public procurement procedures, contract administrators, administrators of integrity plans or administrators of public sector risk registers, especially public officials in public institutions, public agencies and public funds, who are involved in, and make decisions on, public procurement procedures and tenders for public funds; public employees in ministries, bodies within ministries, government offices and administrative units who participate in, and take decisions in, public procurement procedures and public notices involving the use of public funds; public employees in local administration bodies who participate in, and take decisions in, public procurement procedures and public notices involving the use of local administration body funds.

Objective: presentation of the institutes of the ZIntPK, ZJU and ZJN-3: principles of public procurement, conflict of interest, restriction of business, gifts, protection of whistleblowers/ reporting persons, control of assets, anti-corruption clause, revolving doors, lobbying.

The training module was co-financed by the Republic of Slovenia and the European Union from the European Social Fund, under the Effective Human Resources Management project.

**ACTIVITIES ARE IN PROGRESS**

1. **COMPLETED MEASURE SET OUT IN THE GOVERNMENT PROGRAMME 2017–2019:**

**2.a**

**Ensuring the effective management of state-owned real estate** – Ministry of Public Administration (Gospodar)

1. **NEW MEASURES:**

***3A INTEGRITY AND TRANSPARENCY OF PUBLIC ADMINISTRATION***

***3A.1 MEASURES FOR ALL AREAS***

***3A.1a UPGRADING THE CONTENT OF TRAINING FOR PUBLIC EMPLOYEES AND PUBLIC OFFICE HOLDERS IN STATE AUTHORITIES, LOCAL COMMUNITY ADMINISTRATIONS AND OTHER BODIES GOVERNED BY PUBLIC LAW***

**Institution responsible:** Ministry of Public Administration in cooperation with TI and CPC.

**The purpose and objective of the measure:** to supplement the content of the training with examples that non-governmental organisations have noted as regards integrity and prevention of corruption in practice.

**The method of implementation:** upgrading the content of training taking into account the actually identified problems and dilemmas in practice.

**Indicators:** the number of training events with upgraded content, the number of training participants and their assessment of the relevance of the content and added value based on the extent of knowledge about the subject before the training sessions; the baseline is currently 0

**Implementation deadline:** 2024

Rapporteur:Ministry of Public Administration

**Implementation of the measure:**

The Ministry has carried out activities related to obtaining proposals for additional training content from Transparency International Slovenia (TI). A meeting was held with the TI representatives on 7 March 2023, after which they were provided with a list of the content and target groups of the training courses which, regarding the proposed TI contents, are already held regularly by the Administrative Academy of the Ministry of Justice of the Republic of Slovenia (AA). TI was invited to familiarise itself with the content of the AA and to attend selected training sessions in order to facilitate the identification of any gaps or needs for updating the content of the AA, in light of the findings and knowledge of deviant practices as perceived by TI in its work. At the time of writing, we have not yet received a response from TI. In this context, the Ministry has once again asked TI to respond and to submit proposals for additions to existing training courses, or proposals for new training courses, or proposals for further action to implement this measure.

**ACTIVITIES ARE IN PROGRESS**

***3A.1b VERIFICATION OF KNOWLEDGE OF THE INTEGRITY IN STATE AUTHORITIES AND ADMINISTRATIONS OF SELF-GOVERNING LOCAL COMMUNITIES ACT***

**Institution responsible:** Ministry of Public Administration in cooperation with TI and CPC.

**The purpose and objective of the measure:** analysis of the situation and the need for additional employee training based on the established level and extent of knowledge of the applicable legal regulation.

**The method of implementation:** anonymous electronic survey

**Indicators:** thecarried out a survey and analysis of the findings, to change or upgrade the content of training sessions.

**Implementation deadline:** 2024

Rapporteur:Ministry of Public Administration

**Implementation of the measure:**

A survey was drafted to obtain information on the level of public employees’ awareness about integrity, in particular with regard to their knowledge of the legal regulation of the institutes laid down and regulated by the Public Employees Act (ZJU), which is currently in the process of being amended, as well as their knowledge and the way in which the institutes laid down by the ZIntPK, which are also applicable to public employees to a certain extent, are being implemented and enforced. By letter of 24 September 2023, we invited TI and the CPC to cooperate and to propose a date for a meeting, but we have not yet been able to agree on this. In the light of these activities, we decided that instead of the survey being a one-off fact-finding event, we would put more effort into designing a more permanent interactive questionnaire to test knowledge about the above-mentioned institutes, while at the same time providing an opportunity for learning. In addition, the interactive questionnaire would also be useful for new recruits starting their first job in public administration. In cooperation with the Administrative Academy, we plan to start drafting an interactive questionnaire to test knowledge and educate public employees on the above-mentioned institutes and the Public Employee Code in autumn 2024. We will again invite TI and the CPC to contribute to the design of the content and format of the interactive questionnaire.

**ACTIVITIES ARE IN PROGRESS**

***3A.1c TRANSPARENCY – ENCOURAGING THE PUBLICATION OF PUBLIC INFORMATION IN OPEN FORMATS***

**Institution responsible:** Ministry of Public Administration in cooperation with Ministry of Digital Transformation and Information Commissioner.

**The purpose and objective of the measure:** training of public employees and public office holders in the Government and ministries in the significance of data, data management and the value of opening data in terms of transparency and the impact of data on the functioning of society. The ultimate objective is to train public employees and public office holders to consider the importance of data for the wider social benefit when performing their duties.

**The method of implementation:** training as part of a special training project at the Administration Academy at the Ministry of Public Administration.

**Indicators:** the number of public employees and public office holders in the Government and ministries who will undergo annual training.

**Implementation deadline:** Once a year or after entering employment or appointment.

Rapporteur:Ministry of Public Administration

**Implementation of the measure:**

The study of materials and the preparation of the content, target groups and formats for the delivery of the training module on open data are underway, in line with the purpose and objective of the measure.

**ACTIVITIES ARE IN PROGRESS**

***3A.2 MEASURES IN HEALTHCARE***

***3A.2a ESTABLISHMENT OF PUBLICLY ACCESSIBLE RECORDS AND PUBLICATIONS AND IDENTIFICATION OF SUPERVISIONS OF PUBLIC-PRIVATE PARTNERSHIPS***

**Institution responsible:** Ministry of

**The purpose and objective of the measure:** to eliminate the risk of

1. disregard for conflicts of interest.

2. undue influence and ensuring transparency in the conduct of clinical research. ​

3. disregard for conflicts of interest, disregard for the provisions on the performance of other activities and conflict of interests, and to establish transparency and traceability of issued consents or rejected applications for the issuance of consents to work for another healthcare provider.

**The method of implementation:**

* Re point 1: establishing a record of premises and equipment and appointing the administrator of this record, which will contain an indication of the purpose, method, duration and user of the premises or equipment; establishing price lists.
* Re point 2: defining the initiator and the purpose of the clinical research, the source of funding and the implementation of the control over the recipients of the funds, consent to clinical research regarding the scope and method of conducting research, and the same as under Re point 3;
* Re point 3: defining the procedure for procuring protective equipment in a transparent, traceable, objective and impartial manner, such that the powers and responsibilities of the participants are clearly defined, involving the participation of only those public employees who are assigned to public procurement jobs for which they are appointed, concession jobs or other forms of public-private partnerships.

**Indicators:** the number of administrators per institution, the number of notifications to a superior regarding the alleged conflict of interests or actual exclusions from the procedures, the number of inspections performed (regular, extraordinary), the number of institutions with records, and the number of records established. An analysis of the disposal of assets by institutions; how many institutes engage in market activity and private activity during the same periods; an analysis of the organisation of primary and secondary healthcare activity levels.

**Implementation deadline: July 2024**

Rapporteur:Ministry of Health: Body within Ministry, the Office for Control, Quality, and Investments in Healthcare (the Office):

During the period from 1 September 2013 to 29 February 2024, the Office carried out planned and exceptional systemic and administrative controls, some of which are still ongoing.

**Implementation of the measure:**

The Ministry of Health proposes to **extend the deadline** to allow for more specific reporting on the indicators for the implementation of this measure **until July 2024**.

***3A.2b DETERMINING THE REPORTING OBLIGATIONS OF HEALTHCARE INSTITUTIONS AND THEIR EMPLOYEES UPON RECEIVING GIFTS OR OTHER BENEFITS FROM LEGAL AND NATURAL PERSONS WITH WHOM THEY COOPERATE***

**Institution responsible:** Ministry of Health in cooperation with public healthcare institutions (hereinafter: institutions) and the Health Insurance Institute of Slovenia.

**The purpose and objective of the measure:** to eliminate the risk of

1. disregard for conflicts of interest.

2. undue influence and ensuring transparency in the conduct of clinical research. ​

3. disregard for conflicts of interest, disregard for the provisions on the performance of other activities and conflict of interests, and to establish transparency and traceability of issued consents or rejected applications for the issuance of consents to work for another healthcare provider.

**The method of implementation:**

* Re point 1: establishing a record of premises and equipment and appointing the administrator of this record, which will contain an indication of the purpose, method, duration and user of the premises or equipment; establishing price lists.
* Re point 2: defining the initiator and the purpose of the clinical research, the source of funding and the implementation of the control over the recipients of the funds, consent to clinical research regarding the scope and method of conducting research, and the same as under Re point 3.
* Re point 3: defining the procedure for procuring protective equipment in a transparent, traceable, objective, and impartial manner, such that the powers and responsibilities of the participants are clearly defined, involving the participation of only those public employees who are assigned to public procurement jobs for which they are appointed, concession jobs or other forms of public-private partnerships.

**Indicators:** the number of administrators per institution, the number of notifications to a superior regarding the alleged conflict of interests or actual exclusions from the procedures, the number of inspections performed (regular, extraordinary), the number of institutions with records, and the number of records established. An analysis of the disposal of assets by institutions; how many institutes engage in market activity and private activity during the same periods; an analysis of the organisation of primary and secondary healthcare activity levels.

**Implementation deadline: July 2024.**

Rapporteur:Ministry of Health

**Implementation of the measure:**

The Ministry of Health proposes to **extend the deadline** **until July 2024**.

***3A.3 MEASURES IN HIGHER EDUCATION, SCIENCE, INNOVATION, SPORT, AND EDUCATION***

***3A.3a ENSURING THE IMPLEMENTATION OF MANAGEMENT SELECTION PROCEDURES WITHOUT THE PRESENCE OF CANDIDATES***

**Institution responsible:** Ministry of Higher Education, Science and Innovation in cooperation with public institutions under the jurisdiction of the aforementioned line ministries and the CPC.

**The purpose and objective of the measure:** eliminating the risk of conflict of interests, undue influences, including preventing the influence of the ministry and local self-government on appointments, and giving priority to professionalism over the influence of politics.

**The method of implementation:** ensuring that a management member who is again a candidate for a management member and who is present at a meeting one of whose points is to present the candidates for the management position leaves the meeting at the point of such presentation and consideration of the candidates for such management position.

**Indicators:** minutes with a clear provision that the management member who is running again was excluded from the meeting when considering the point where the candidates are voted on, or the point where other candidates for the management are presented.

**Implementation deadline:** at every meeting of the institution's management at which the members of the management are voted on or the candidates for management members are presented.

Rapporteur:Ministry of Higher Education, Science, and Innovation

**Implementation of the measure:**

The Ministry pursues the goal of the measure and acts in accordance with the legislation governing of higher education and scientific research activities. The system of eliminating members of the management from the decision-making process on new members of the management is regulated at the operational level, generally in the operation of management boards. Members of management boards who are the founders’ representatives will point out the need to consistently adhere to the principle of avoiding conflicts of interest in this context at all meetings where this is relevant and propose that the provision be entered in the relevant internal regulations of the public institutions under the Ministry jurisdiction. We would also like to stress that the Ministry is also committed to eliminating the risk of conflicts of interest and undue influence in the appointment of founder (i.e. the Republic of Slovenia) representatives on boards of directors and councils of public research, infrastructure and higher education institutions, as the selection process is based on a public call for tenders, which contains predetermined criteria, conditions and criteria for selection.

On the proposal of the Ministry of Higher Education, Science and Innovation, the Ministry of Education will be added as the implementing authority for this measure, and the title of the measure will be amended accordingly.

**ACTIVITIES ARE IN PROGRESS**

***3A.4 MEASURES ON THE ENVIRONMENT AND SPATIAL PLANNING***

***3A.4a ENABLING PUBLIC OVERSIGHT OVER THE VALUES OF THE LIMITING FACTORS DETERMINED BY LAW (VALUES OF NOISE LEVELS, BAD ODOURS, THE PRESENCE OF IMPURITIES)***

**Institution responsible:** Ministry of the Environment, Climate and Energy.

**The purpose and objective of the measure:** it is in the public interest that the values of noise levels, bad odours, and the presence of impurities are known, and that the public therefore has the opportunity to become familiar with them; therefore, the purpose is to enable making these data public when the indicators of the aforementioned values exceed the limits determined by law; ​

**The method of implementation:** publication of the values of the limiting factors of noise, bad odour, and the presence of impurities when these values exceed the limits determined by law.

**Indicators:** regular publication of data when the limit values determined by law are exceeded.

**Implementation deadline:** 1 year.

Rapporteur: Ministry of the Environment, Climate and Energy

**Implementation of the measure:**

ARSO publishes data from strategic noise maps that show an overview of environmental noise pollution in an individual area, or an assessment of the population's exposure to noise due to the operation of various noise sources, in the Environmental Atlas, which can be accessed at the following link: <https://gis.arso.gov.si/atlasokolja/profile.aspx?id=Atlas_Okolja_AXL@Arso>.
Air quality data are published on the website <http://hmljn.arso.gov.si/zrak/kakovost%20zraka/podatki/>. Water quality data are published on the website http://hmljn.arso.gov.si/vode/podatki/. ARSO does not monitor bad odour data, as there is no legal basis for this.

**THE MEASURE HAS BEEN COMPLETED**

***3A.4b ENSURING TRANSPARENCY IN EMISSIONS DATA ​***

**Institution responsible:** Ministry of the Environment, Climate and Energy or a body within this Ministry.

**The purpose and objective of the measure:** eliminating the risk of undue influence and increasing transparency.

**The method of implementation:** providing publicly available data on issued environmental protection permits and on the results of monitoring specified in environmental protection permits, on state administration's central websites, in accordance with the Environmental Protection Act;

**Indicators:** the publication of data on GOV.si portal.

**Implementation deadline:** already determined by the Environmental Protection Act (ZVO-2, six months after entry into force).

Ministry of the Environment, Climate and Energy

**Implementation of the measure:**

ARSO publishes data on the results of monitoring specified in environmental protection permits on water emissions on the website:

* [http://hmljn.arso.gov.si/varstvo%20okolja/onesna%c5%beevanje%20voda/](http://hmljn.arso.gov.si/varstvo%20okolja/onesna%C5%BEevanje%20voda/); air emission data are published on the website:
* [http://hmljn.arso.gov.si/varstvo%20okolja/onesna%c5%beevanje%20zraka/](http://hmljn.arso.gov.si/varstvo%20okolja/onesna%C5%BEevanje%20zraka/), while noise emission data are not yet published on the website. Activities are underway to make noise emission data publicly available.

**ACTIVITIES ARE IN PROGRESS**

***3A.4c TRANSPARENT AND UP-TO-DATE PUBLICATION OF DATA ON THE CHANGE IN THE EMISSION LIMIT VALUES AND ENVIRONMENTAL QUALITY STANDARDS***

**Institution responsible:** Ministry of the Environment, Climate and Energy or a body within this Ministry.

**The purpose and objective of the measure:** the public is interested in knowing emission limit values and limit, target, warning, alarm, critical, triggering and planning values of environmental quality standards. ​ It is also the public’s wish to be familiar with the reasons for the proposal or amendment to the regulation, which is the basis for the implemented changes, and with information on when the changes are applied.

**The method of implementation:** publishing the planned and accepted changes to emission limit values and limit, target, warning, alarm, critical, trigger and planning values of environmental quality standards publicly online, including an explanation of the proposal or change in a regulation, an indication of when the changes apply, and an indication of the legal act that is the basis for implemented changes.

**Indicators:** regular online publication of planned and accepted changes to emission limit values and limit, target, warning, alarm, critical, triggering and planning values of environmental quality standards.

**Implementation deadline:** on each planned and accepted change.

Rapporteur:Ministry of the Environment, Climate and Energy

**Implementation of the measure:**

All draft regulations are published on e-democracy, so that the public is informed at an early stage of the regulations’ formulation and has the opportunity to comment on possible changes to emission limit values and environmental quality standards.

Examples of published draft acts on e-democracy:

* Order on the classification of the Municipality of Celje in environmental burden levels due to the soil’s pollution with dangerous substances (published on 10 October 2023);
* Legal Act on the emergency plan for natural gas supply (published on 6 November 2023);
* Decree amending the Decree on the environmental tax on air pollution caused by carbon dioxide emissions (published on 13 December 2023);
* Decree amending the Decree on the self-supply of electricity from renewable energy sources (published on 28 December 2023).

**THE MEASURE HAS BEEN COMPLETED**

***3B INTEGRITY AND TRANSPARENCY OF FUNCTIONS IN THE GOVERNMENT AND MINISTRIES AND DEPUTY FUNCTION***

***3Ba STUDY OF THE APPLICABLE REGULATION AND PRACTICE FOR THE PERFORMANCE OF PERMITTED ACTIVITIES OF OFFICERS AND THE ESTABLISHMENT OF UNIFORM REGULATION AND IMPLEMENTATION***

**Institution responsible:** Ministry of Public Administration

**The purpose and objective of the measure:** eliminating the risk of conflict of interest and non-transparent conduct; ensuring transparency, uniformity, and the same practice in issuing permits for the performance of authorised activities by officials.

**The method of implementation:** determining the sole method of authorising permitted activities and determining the scope and method of control over compliance in the authorisation’s content and the performance of activities.

**Indicators:** the single authorisations issued.

**Implementation deadline: the first half of 2025**

Rapporteur:Ministry of Public Administration

**Implementation of the measure:**

The applicable regulation of activities permitted for officers has been analysed, concluding that the regulation of officers varies considerably with regard to the types and scope of permitted activities that they are allowed to carry out in addition to the performance of their duties. On 5 March 2024, representatives of the Ministry of Public Administration attended an expert consultation on "The public sector and the pursuit of additional gainful activities: between law, practice and societal expectations”, held by the Commission for the Prevention of Corruption, which was aimed at discussing the reasonableness and acceptability of the current regime and possible legislative changes in this area. The debate shed light on the question of the advisability of differentiating between types of additional activities according to functions (and types of employment), and on possible arrangements that would eliminate unjustified distinctions and standardisation to the greatest extent possible, taking into account some of the specificities of individual functions. There is also considerable confusion about the types and forms of activities that are permitted as additional activities for most officers, such as teaching, which should be clearly defined in terms of what it entails and what should be done in the case where it is carried out for remuneration as an additional activity. In view of the above and the outstanding issues, in line with the objective of the measure, which is "to eliminate the risk of conflicts of interest and non-transparent conduct", the current objective of the measure should be extended in this respect and implemented before the implementation of the current objective of the measure – "to determine the uniform content of the authorisation for the exercise of the authorised activities and to determine the scope of and the manner of control over the compliance of the content of the authorisation with the exercise of the activity", which is why the Ministry proposes to **extend the deadline for the implementation of this measure until the first half of 2025**.

**ACTIVITIES ARE IN PROGRESS**

***3B.b EXAMINING THE CLARITY AND THE INTEGRITY OF THE PROCEDURE’S REGULATION IN RELATION TO DEALING WITH INCOMPATIBILITY WITH THE EXERCISE OF AN AMBASSADOR'S FUNCTION AND THE PROHIBITION OF ACTIVITIES OR MEMBERSHIP***

**Institution responsible:** Ministry of Public Administration in cooperation with Ministry of Justice, the National Assembly of the Republic of Slovenia and CPC.

**The purpose and objective of the measure:** determining the suitability of the current regulation and proposing any necessary legislative changes or amendments, thereby eliminating the risks of inconsistent and deficient performance of a deputy’s tasks for conflict of interests; regulating the incompatibility of parliamentary function; ensuring a clear and uniform regulation and application in practice.

**The method of implementation:** the amended Deputies Act.

**Indicators**: entry into force of a law amendment that will regulate the subject area.

**Implementation deadline:** 2 years,

Rapporteur: Ministry of Public Administration

**Implementation of the measure:**

After examining the current legal regulation of the incompatibility of a Member of the Parliament performing their duties and the prohibition on the performance of activities or membership in the performance of such duties, a working meeting will be held in May 2024 with representatives of the competent department of the National Assembly in order to exchange opinions and experiences in practice, possible problems in the application of the legal regulation and proposals for a clearer regulation. A working meeting with representatives of the Ministry of Justice and the CPC will be held with the same purpose and on the same subject.

**ACTIVITIES ARE IN PROGRESS**

***3C MEASURES FOR INSPECTION BODIES***

***3C.a ELIMINATION OF THE RISKS OF INEFFECTIVE PERFORMANCE OF SUPERVISORY TASKS***

**Institution responsible:** Inspection Board in cooperation with inspection bodies and CPC.

**The purpose and objective of the measure:** establishing appropriate solutions for greater efficiency of inspections, with due regard to the risks such as the insufficient number of inspectors, the lack of criteria and criteria for introducing supervision, unresponsiveness to applications for supervision.

**The method of implementation:** definition of ineffectiveness of inspection bodies and proposals for eliminating such risks.

**Indicators:** the identified risks of ineffectiveness and proposed solutions.

**Implementation deadline:** 1 year.

Rapporteur:Inspection Board

**Implementation of the measure:**

The Working Group on the implementation of activities related to the common information system of inspection bodies has carried out some activities towards the common information system, such as an inquiry with inspection bodies as to which information systems they are using, which information systems they are developing with their own resources or with the resources of the Recovery and Resilience Plan, whether they are interested in the development of a common (uniform) information system, and what specific conditions or requirements they need for their work. A solution is still being sought, as there are significant differences between inspection bodies in the way they organise their work, the rules under which they carry out inspections and their competences.

At its meeting on 24 January 2024, the Inspection Council considered the question of whether an inspector may act as a court expert or certified appraiser in inspections (Article 15 of the Inspection Act), either on the basis of a court order or on the basis of a legal transaction concluded with a private party. On 9 April 2024, the issue was further discussed by the Legal Committee of the Inspection Council, in particular Article 15 of the Inspection Act and the performance of the duties of a court-appointed expert or court appraiser. In this respect, the Inspection Council has obtained the CPC’s opinion on the risks to the objective and impartial performance of the inspector's duties. At its meeting on 6 March 2024, the Inspection Council again discussed staffing issues in the inspection bodies and inspectors' salaries, but certain issues are still pending, as the draft Public Employees Act (draft ZJU-1) is still in the process of inter-ministerial coordination, and salary negotiations are still ongoing.

**ACTIVITIES ARE IN PROGRESS**

***3Č MEASURE ON THE FUNCTIONING AND FUNDING OF DISABILITY, HUMANITARIAN AND SPORTS ORGANISATIONS***

**Institution responsible:** Ministry of Economy, Tourism and Sport (MGTŠ)

**The purpose and objective of the measure:** Analysis of the current legal regulation with a view to identifying any shortcomings and ambiguities due to the lack of mechanisms for the prevention of corruption risks and risks of integrity and ethics violations; drafting the appropriate legal basis and specifying criteria for earmarking funds for disability, humanitarian and sports organizations; **The method of implementation:** establishing a mechanism, procedure and authority for carrying out the external and independent supervision of the work of such organizations. The Foundation for Financing Sports Organizations in the Republic of Slovenia and Foundation for Financing Disability and Humanitarian Organizations in the Republic of Slovenia Act is in preparation.

To draw up and implement regulatory acts to ensure, in terms of regulation and implementation, transparency in procedures and the use of funds within humanitarian, disability and sports organizations.

**Indicators:** – making the analysis, showing the shortcomings of the current regulation – making appropriate, content-relevant proposals for the regulatory framework that will include regulation in the terms of integrity and transparency of operations (the Act regulating the founding of the Sport, Disability and Humanitarian Organizations in the Republic of Slovenia)

**Deadline for implementation:** - December 2024 or at the beginning of 2025

Rapporteur:Ministry of the Economy, Tourism and Sport

**Implementation of the measure:**

The Ministry of Economy, Tourism and Sport (MGTŠ) is still planning the systemic regulation of the Foundation for Sport (FŠO), while the Foundation for the Financing of Disability and Humanitarian Organisations (FIHO) falls under the remit of another ministry. After the transfer of the remit of sport from the Ministry of Education, Science and Sport to the MGTŠ, it was unfortunately not yet possible to start drafting the changes to the regulation due to staffing and organisational challenges, inter alia related to the priority preparation of strategic documents on sport.

The Ministry will start to regulate the area after the adoption of the National Sport Programme 2024–2033 or after the adoption of the Implementation Plan of the National Sport Programme, which is expected to take place at the end of 2024 or at the beginning of 2025.

**ACTIVITIES FOR CONTINUING THE IMPLEMENTATION OF THE MEASURE HAVE NOT YET STARTED**

**3D RECOMMENDATIONS FOR MUNICIPALITIES**

**3D.a RAISE AWARENESS OF THE RISKS OF CONFLICTS OF INTEREST IN CASES OF MEMBERSHIP OF MUNICIPAL OFFICIALS IN THE GENERAL ASSEMBLIES OF PUBLIC COMPANIES SET UP BY THE MUNICIPALITY IN WHICH THE OFFICIALS CARRY OUT ACTIVITIES**

**Responsible institution:** ministry responsible for public administration in cooperation with representative associations of municipalities and the Commission for the Prevention of Corruption.

**Purpose and objective of the measure**: reducing risks for conflict of interest and prohibition of membership and performing profitable activities in accordance with Article 27 of the Integrity and Prevention of Corruption Act (ZIntPK);

**Method of implementation:** training municipal officials to raise awareness of circumstances and conditions giving rise to risks of conflicts of interest by virtue of their office, and membership of the general assemblies of public companies set up by the municipality.

**Indicators:** number of training courses delivered, including content; published lists of municipal officials' memberships in the general assemblies of public undertakings of which the municipality in which the official holds office is a founder.

**Implementation deadline:** after every regular local election.

**3D.b RAISE AWARENESS OF THE OBLIGATION TO KEEP UP-TO-DATE REPORTING OF LOBBYING CONTACTS, TO DECLARE ASSETS, TO RESTRICT BUSINESS AND TO STRICTLY AVOID CONFLICT OF INTEREST SITUATIONS**

**Responsible institution:** ministry responsible for public administration in cooperation with representative associations of municipalities and the Commission for the Prevention of Corruption.

**Purpose and objective of the measure:** raising awareness and knowledge of the correct way to deal with situations and circumstances that could pose a risk of conflicts of interest, the obligation to report lobbying contacts, declaration of assets and restrictions on business.

**Method of implementation:** regular training, publication of the link to the official website of the Commission for the Prevention of Corruption on the websites of local communities.

**Indicators:** the amount of implemented annual training; publication of the link to the official website of the Commission for the Prevention of Corruption on websites of local communities.

**Implementation deadline:** after every regular local election.

1. [Prvo-vmesno-porocilo-2023-2026.docx (live.com)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.gov.si%2Fassets%2Fministrstva%2FMJU%2FSTIPS%2FIntegriteta%2FPreimenovanje-porocil-2023-2026%2FPrvo-vmesno-porocilo-2023-2026.docx&wdOrigin=BROWSELINK) [↑](#footnote-ref-2)
2. <https://www.sdh.si/Data/Documents/pravni-akti/Upravljanje%20korporativne%20kulture%20-%20priro%C4%8Dnik%20za%20%C4%8Dlane%20nadzornih%20svetov.pdf> [↑](#footnote-ref-3)
3. [https://www.sdh.si/Data/Documents/pravni- akti/Kodeks%20korporativnega%20upravljanja\_november\_2019.pdf](https://www.sdh.si/Data/Documents/pravni-%20akti/Kodeks%20korporativnega%20upravljanja_november_2019.pdf) [↑](#footnote-ref-4)