

(Cabinet Order No. 199 of
11 April 2023)

THE CORRUPTION PREVENTION AND COMBATING
ACTION PLAN
2023– 2025

Corruption Prevention and Combating Bureau
Riga, 2023

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Abbreviations Used

MoD	Ministry of Defence
MoFA	Ministry of Foreign Affairs
Altum	Joint-Stock Company “Attīstības finanšu institūcija Altum”
SCCB	State Construction Control Bureau
CEC	Central Election Commission
DSI	Data State Inspectorate
EDIS	Electronic Data Input System
EDS	Electronic Declaration System
EPS	Electronic Procurement System
EC	European Commission
MoE	Ministry of the Economics
EU	European Union
ESF	European Social Fund
EP	European Parliament
FIU	Financial Intelligence Unit
FCMC	Financial and Capital Market Commission
MoF	Ministry of Finance
GRECO	Group of States against Corruption of the Council of Europe
PGO	The Prosecutor General's Office
ISB	Internal Security Bureau
MoI	Ministry of the Interior
MoI IC	Ministry of the Interior Information Centre
LPA	Prison Administration
PCIL	Law On Prevention of Conflict of Interest in Activities of Public Officials
ICS	Internal control system
PMB	Procurement Monitoring Bureau
MoES	Ministry of Education and Science
CL	The Criminal Law
MoC	Ministry of Culture
KNAB	Corruption Prevention and Combating Bureau
CC	Competition Council
CPL	Criminal Procedure Law
CPI	Corruption Perceptions Index
CM	Cabinet of Ministers
Regulation No. 630	Cabinet Regulation No. 630 of 17 October 2017 “Regulations Regarding the Basic Requirements for an Internal Control System for the Prevention of the Risk of Corruption and Conflict of Interest in an Institution of a Public Person”
MP	Military Police
NDP2027	National Development Plan 2021-2027
NEPLP	National Electronic Mass Media Council
ML	Laundering of the Proceeds of Crime
AML/CFTP	Prevention of money laundering and terrorism and proliferation financing
NCIM	National Criminal Intelligence Model
CPC	Crime Prevention Council
NHS	National Health Service
NGOs	Non-governmental organisations
OECD	Organisation for Economic Co-operation and Development

OECD Convention	OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
OECD WGB	OECD Working Group on Bribery in International Business Transactions
OCMA	Office of Citizenship and Migration Affairs
AA	Audit Authority for the European Union Funds (Audit Department for the European Union Funds, Ministry of Finance)
CA	Courts Administration
LEAs	Law enforcement authorities
TAP portal	Single Portal for Development and Harmonisation of Draft Legal Acts
JIS	Judicial Information System
MoJ	Ministry of Justice
RE	The Register of Enterprises of the Republic of Latvia
MoEPRD	Ministry of Environmental Protection and Regional Development
LSPA	Latvian School of Public Administration
SSS	State Security Service
SRS	State Revenue Service
NCE	National Centre for Education
SAO	State Audit Office
SC	State Chancellery
MoH	Ministry of Health
SP	State Police
SRDA	State Regional Development Agency
SBG	State Border Guard

I. Summary of the Plan

The Corruption Prevention and Combating Action Plan 2023-2025 (hereinafter referred to as the 'Anti-Corruption Action Plan') has been developed on the basis of Sub-paragraph 13.2 of Cabinet Regulation No. 737 of 2 December 2014 "Regulations on Elaboration and Impact Assessment of Development Planning Documents", which stipulates that the plan shall be developed for the short or medium term instead of guidelines, unless new development directions in sectoral policies are set in the medium term. Accordingly, the new Anti-Corruption Action Plan is a continuation of the Guidelines for Preventing and Combating Corruption 2015-2020 (approved by Cabinet Order No. 393 of 16 July 2015 "On Guidelines for Preventing and Combating Corruption 2015-2020") (hereinafter referred to as the 'Guidelines').

The Anti-Corruption Action Plan maintains the corruption preventing and combating course previously defined in the Guidelines, i.e., the main objectives and lines of action, but at the same time it includes a new set of tasks for public institutions to respond flexibly and adapt to current developments and problematic situations in society and the problems of applying legal provisions. This Anti-Corruption Action Plan does not duplicate measures and tasks in the area of preventing and combating corruption that are included in policy planning documents developed by other institutions.

The development of the Anti-Corruption Action Plan has taken into account not only 20 years of professional experience of KNAB¹ and continuous analysis of its performance in preventing and combating corruption in Latvia, but also the recommendations provided by international organisations (e.g., GRECO², OECD³, Moneyval⁴) and experts, proposals made at various working meetings, as well as recommendations made at events (conferences, seminars), surveys, studies and reports related to the prevention and combating of corruption on the desired and necessary improvements for more effective implementation of anti-corruption policy in Latvia.

The development of this Anti-Corruption Action Plan has involved the direct public administration institutions, their subordinate or supervisory institutions, the judiciary, the SAO, the Ombudsman and Latvian non-governmental organisations, providing in writing proposals and recommendations based on their competences and professional experience on improvements to be introduced to successfully prevent and combat corruption in Latvia in the coming years. During the period between 30 March and 23 April 2021, KNAB has ensured public participation in the development of the Anti-Corruption Action Plan. Proposals have been submitted by three non-governmental organisations and one political party. On

¹ 10 October 2002 marks the beginning of KNAB's activities, when the Saeima appointed the first Director of KNAB, Guntis Rutkis

² The EP's Anti-Corruption Intergroup, set up by the EP in 1999. GRECO's work aims to improve the capacity of its Member States (currently 49 European countries and the United States) to prevent corruption and to monitor the implementation of undertaken commitments through a dynamic peer review process. Latvia acceded to the EP Treaty establishing GRECO on 15 June 2000.

³ The Organisation for Economic Co-operation and Development or OECD is an intergovernmental organisation founded in 1961, bringing together 38 of the world's most developed countries, including 22 EU Member States. Latvia officially became the 35th member state of the OECD on 1 July 2016. The OECD is a forum and a globally recognised centre of expertise that enables Member States to effectively address their concerns in a wide range of sectors. The mission of the organisation is to build and promote reforms that improve people's standards of living, socio-economic conditions and economic competitiveness. To achieve this, the OECD develops international guidelines and standards to promote sustainable development and respond to topical global challenges.

⁴ Moneyval, the EP Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism, set up in 1997. Currently, it consists of 27 Member States, it is a subordinate body of the EP Committee of Ministers. Moneyval's role is to assess compliance with the key international standards in the area of combating money laundering, terrorism and proliferation financing, and effectiveness of implementation thereof, as well as to make recommendations for improvements.

15 April 2021, the content of the Anti-Corruption Action Plan was discussed at a meeting of the KNAB Public Advisory Board. On 14 and 17 May 2021, KNAB organised a meeting on the proposals made within the framework of the public participation procedure (29 proposals were discussed⁵). Inter-institutional harmonisation of the draft plan started in July 2021⁶.

The Anti-Corruption Action Plan contains the main objectives of Latvia's corruption prevention and combating policy, the lines of action, as well as specific measures and tasks to achieve them.

Similarly as in the previous planning period, the **central principle of the corruption prevention and combating policy, i.e., credibility of public and private sector administration**, will be maintained in the upcoming years observing the following:

1) the principle of good governance of institutions and organisations, which includes the principle of the rule of law, openness, equality, impartiality, proportionality, legal certainty, legitimate expectations, compliance with reasonable term, participation, transparency and efficiency;

2) the principle of effective human resources management, which includes the principle of the fair evaluation of merits, ethics, openness, accountability, equality, respect of the public interests, non-arbitrariness and legitimate expectations.

By improving the regulatory framework, developing internal anti-corruption control systems, as well as ensuring continuous staff education, the implementation of the Anti-Corruption Action Plan will directly or indirectly affect all the public person's institutions, including the public person's capital companies, thus achieving the **overarching objective of the corruption prevention and combating policy — to ensure reliable functioning of any institution or organisation by complying with the principle of good governance and effective management of human resources**.

The tasks to be carried out and included in the Anti-Corruption Action Plan for the period 2023-2025 have been purposefully planned according to the priorities of the corruption prevention and combating policy already set out in the Guidelines, namely:

- 1) to reorient the anti-corruption and fraud combating policy from external control implemented by control institutions towards internal control by departments and institutions;
- 2) to ensure openness in the selection of public administration human resources and the provision of ethical, motivated, competent staff throughout the public administration and the judiciary;
- 3) to promote the reduction of public tolerance towards corruption and public participation in the policy-making process;
- 4) to implement measures for restricting corruption and fraud in the private sector.

The tasks to be implemented, included in the Anti-Corruption Action Plan 2023-2025, have been organised by dividing them according to five main sub-objectives, as well as 13 lines of action to achieve them:

⁵ KNAB website. Public objections and proposals on the Anti-Corruption Action Plan 2021-2024, see: <https://www.knab.gov.lv/lv/media/1869/download>

⁶ The draft plan was announced at the meeting of the State Secretaries on 01.07.2021. During the course of the harmonisation procedure, the policy planning period was changed, comprising 2021-2025. The draft plan "Corruption Prevention and Combating Action Plan 2021-2025" of 30.12.2022 was submitted to the Meeting of State Secretaries for consideration (19.01.2023, 22-TA-3541). In March 2023, when presenting the draft plan for consideration at the Cabinet meeting, KNAB, taking into account the delay in the progress of the draft plan, updated the deadlines for the implementation of the measures envisaged in the plan and accordingly set the planning period as 2023-2025. The technical adjustments in the draft plan did not affect the continuity of the implementation of the anti-corruption policy in Latvia in 2021 and 2022.

Sub-objective 1: To ensure such public administration human resources management policy that excludes motivation for corrupt behaviour

- 1 Line of action: Improvement, explanation, application of the PCIL provisions and review of the circle of persons subject to preventive anti-corruption measures;
- 2 Line of action: Improvement of human resource management in public administration, promoting ethics and reducing the risks of corruption and conflict of interest.

Sub-objective 2: To establish and improve an autonomously and continuously operating internal control system that limits to the maximum extent the possibilities of emergence of corruption and defrauding of funds, including the EU and other foreign funds in the state, local government or private sector

- 3 Line of action: Perfection, maintenance and monitoring of the internal control system in the state and local government institutions and capital companies;
- 4 Line of action: Ensuring the lawfulness of the use of public property and financial resources, including EU funds and other foreign financial aid instruments;
- 5 Line of action: Strengthening of integrity and prevention of corruption risks among the judiciary and its related officials;
- 6 Line of action: Implementing anti-corruption measures in the private sector;

Sub-objective 3: To reduce public tolerance towards corruption

- 7 Line of action: Involvement of individuals and groups outside the public sector in prevention of corruption and promotion of public intolerance towards corruption and its threats;
- 8 Line of action: Improvement of protection of whistleblowers and informing the public about reporting possibilities in cases of detected offences;

Sub-objective 4: To ensure inevitability of punishment for offences related to abuse of office and misuse of entrusted power

- 9 Line of action: Imposition of effective, proportional and dissuasive administrative or criminal penalties for violations;
- 10 Line of action: Holding the persons liable for embezzlement, misappropriation or other similar unlawful use of property by a public official;
- 11 Line of action: Strengthening of effective, knowledge-based actions of law enforcement authorities to fight economic crimes;

Sub-objective 5: To limit the power of money in politics

- 12 Line of action: Ensuring transparency in the financing of political organisations and reducing the role of money in politics;
- 13 Line of action: Promotion of public participation in the policy-making process.

The outcome of the tasks included in the Anti-Corruption Action Plan is focused on the entire society of Latvia — its benefits related to the effective prevention and combating of corruption, control over the implementation of the rules regarding the financing of political organisations (parties) and their unions, as well as control of pre-election campaigns.

In order to establish an indicative level of progress in the implementation of the area of the set anti-corruption objectives in Latvia during the implementation period of the Anti-Corruption Action Plan, the desired performance indicators have been set. The Anti-Corruption Action Plan sets out the timetable for completing the tasks and the reporting and evaluation procedures.

II. Description of the Current Situation

During the previous planning period, the Guidelines have been the main development planning document in the area of preventing and combating corruption in Latvia. According to Cabinet Order No. 393 of 16 July 2015 “On the Guidelines for Preventing and Combating Corruption 2015-2020”, KNAB has been the institution responsible for implementation of the aforementioned Guidelines and coordination of implementation of the tasks and measures envisaged in the Guidelines. During the previous reporting period, KNAB has monitored the

progress of implementation of the planned tasks and measures. An informational report “On the Interim Evaluation of the Implementation of the Guidelines on Preventing and Combating Corruption 2015-2020 in 2015-2018”⁷ has been prepared and submitted to the Cabinet of Ministers, summarising information on the progress of the implementation of the Guidelines' tasks during the period from 2015 through 2017. According to the above mentioned Cabinet Order No. 393 of 16 July 2015, an informational report “On the Final Assessment of the Impact of Implementation of the Guidelines on Preventing and Combating Corruption 2015-2020” has also been prepared⁸. The aforementioned informative reports have been prepared in cooperation with the institutions involved in the implementation of the Guidelines, summarising the information they provided on the implementation of the tasks and measures included in the Guidelines, as well as the results achieved during the period of the Guidelines' operation.

Since the effectiveness of measures to prevent and combat corruption depends to a large extent on the actual situation in the country's political, economic, social and technological environment, these aspects have been identified and taken into account in the development of the Anti-Corruption Action Plan. The analysis of the existing environment for preventing and combating of corruption in Latvia is included in the information report “On the Final Evaluation of the Implementation of the Guidelines on Preventing and Combating Corruption 2015-2020”. The Anti-Corruption Action Plan has been developed on the basis of the final impact evaluation of the implementation of the Guidelines and its conclusions, as well as taking into account the content of other related policy planning and international organisation documents that include or support current policy initiatives to prevent and combat corruption.

1 Linking the Anti-Corruption Plan to Other Policy Planning and International Organisation Documents

The Anti-Corruption Action Plan is the main development planning document in the field of preventing and combating corruption in Latvia, yet at the same time it should be considered in conjunction with a number of other policy planning documents that directly or indirectly provide for public institutions tasks whose implementation is related to the overarching objective of this plan: to ensure reliable functioning of any institution or organisation complying with the principle of good governance of institutions and of effective management of human resources. The most relevant policy planning documents related to the Anti-Corruption Action Plan are:

1) **National Development Plan of Latvia for 2021-2027**⁹, which is the *main medium-term national development planning document* (approved by the Saeima on 2 July 2020). Its vision for the future of Latvia in 2027, within the context of equal rights, aims to move towards a policy of increasing transparency, reducing the risks of corruption in both state and local government institutions. One of the six priorities defined in the plan is “A United & Open, Safe and Secure Society”. The line of action “Rule of Law and Governance” set therein provides for as one of its objectives “ensuring that the judicial and law enforcement system becomes more efficient, convenient, easy to access and understand; strengthening capacity, improving cooperation, simplifying legal processes (through cooperation between institutions — digitally, in coordination platforms, exchange of best practice, joint training, research and expertise); introducing innovative, results-oriented and cost-effective solutions in all pre-trial investigation

⁷ KNAB website, Informational Report “On the Interim Evaluation of the Implementation of the Guidelines on Preventing and Combating Corruption 2015-2020 in 2015-2018” (adopted without consideration at the Cabinet meeting); see: <https://www.knab.gov.lv/lv/legislations/strategy/policy/>

⁸ Information Report “On the Final Assessment of the Impact of Implementation of the Guidelines on Preventing and Combating Corruption 2015-2020” (22-TA-1210) adopted by the Cabinet of Ministers on 21 July 2022, see: https://tapportals.mk.gov.lv/legal_acts/7be93c45-5944-4c1e-98a5-4ad19db6ac16

⁹ National Development Plan of Latvia for 2021–2027, see: <https://likumi.lv/ta/id/315879-par-latvijas-nacionalo-attistibas-planu-20212027-gadam-nap2027>
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institutions, courts and out-of-court dispute resolution institutions; improving support and protection systems for vulnerable persons and victims” (task No. 429 of the line of action).

2) The **National Security Concept**¹⁰ (approved by the Saeima on 26 September 2019), which, with regard to the prevention of threats to the internal security and constitutional order of the country, emphasises that “the high level of corruption, the abuse of insolvency proceedings, and the cases where involvement of the State and local government officials or officials of their undertakings in criminal offences related to corruption is suspected leaves a negative impression on the society as to the provision of the rule of law in the State. The functioning of the judicial system is still negatively characterised by the long period of hearing cases in courts.” One of the priorities within the context of addressing threats to national security is the prevention of the threat to the economy of Latvia. The aforementioned concept states that “corruption, deficiencies in public procurement procedures, in the judicial and insolvency system are factors that hinder the development of the entrepreneurial environment, and measures for ensuring transparency of the efficiency and operation of the State administration should be continued in order to reduce these factors, concurrently strengthening the openness of the State administration and the integrity of public officials”. To ensure a stable economic environment, the National Security Concept provides for that “reforms in the public sector, management of State and local government undertakings should be performed in order to improve the transparency of their activities and the decisions taken, to eliminate the risks of corruption and the situations of a conflict of interests.[...]Concurrently adequate abilities of the law enforcement authorities and authorities responsible for corruption in discovering and investigation of economic and financial crimes should be ensured, as well as efficiency of the operation of the judicial system in trying such crimes should be improved”.

3) **Sustainable Development Strategy of Latvia until 2030**¹¹ (approved by the Saeima on 10 June 2010) — the document highlights possible causal links between the decline in public trust in public administration institutions, political organisations (political parties) and the emergence of corruption risks, thus pointing at the need to significantly raise the level of public trust in public administration, in order to further promote policy implementation in every area.

4) **“Plan of Measures for the Prevention of Money Laundering, Terrorism and Proliferation Financing for 2022”**¹² (adopted by the CM on 22 February 2022) — the plan was developed by updating the “Plan of Measures for the Prevention of Money Laundering, Terrorism and Proliferation Financing for the Period from 2020 until 2022”, approved by Cabinet Order No. 576 of 29 September 2020. It defines a number of tasks aimed at strengthening the capacity of Latvia to combat money laundering, terrorism and proliferation financing and to monitor the implementation of the requirements of the AML/CFTP regime, reduce the overall risks of money laundering and terrorism and proliferation financing, thus ensuring compliance with international obligations and standards in the area of AML/CFTP and promoting public security, competitiveness of the economic environment and confidence in the jurisdiction of Latvia. Consequently, the “Plan of Measures for the Prevention of Money Laundering, Terrorism and Proliferation Financing for 2023-2025” was adopted by Cabinet Order No. 940 of 13 December 2022¹³.

¹⁰ National Security Concept, see: <https://likumi.lv/ta/id/309647-par-nacionalas-drosibas-koncepcijas-apstiprinasanu>

¹¹ Sustainable Development Strategy of Latvia until 2030, see: <http://polsis.mk.gov.lv/documents/3323>

¹² Cabinet Order No. 122 of 22 February 2022 “On the Plan of Measures for the Prevention of Money Laundering, Terrorism and Proliferation Financing for 2022”, see: <https://likumi.lv/ta/id/330241-par-pasakumu-planu-noziedzigi-iegutu-lidzeklu-legalizacijas-terorisma-un-proliferacijas-finansesanas-noversanai-2022-gadam>

¹³ Cabinet Order No. 940 of 13 December 2022 “On the Plan of Measures for the Prevention of Money Laundering, Terrorism and Proliferation Financing for 2023-2025”, see: https://tapportals.mk.gov.lv/legal_acts/6019baba-edc7-4dd9-a72e-49ee3b9027d8

5) Cabinet **Order No. 49** of 11 February 2020 “On the Plan of Measures for Improving the Public Procurement System”¹⁴, which includes a set of measures to improve the public procurement process, inter alia, to reduce corruption risks.

6) **“Action and Task Plan for the Implementation of the Phase 3 Recommendations of the Working Group on Bribery in International Business Transactions of the Organisation for Economic Co-operation and Development”**¹⁵ (adopted by the CM on 28 April 2020) — developed to ensure the implementation of the WGB Phase 3 recommendations. The Plan includes a set of actions and tasks based on the recommendations made by the OECD WGB in its Phase 3 Evaluation Report. The aim of the Plan is to develop the capacity of Latvia to detect and investigate cross-border corruption and related crimes (money laundering, financial crimes, including accounting-related offences) in a coordinated manner, as well as to strengthen the rule of law, promote economic growth, ensure a transparent decision-making process and a stable legal environment.

7) **Crime Prevention Council Action Plan**¹⁶ (CPC approved on 3 June 2021) — sets out tasks in three lines of action: (1) “Risk Management and Prioritisation” with the aim to identify crime risks, priority measures dedicating appropriate resources thereto, as well as to strengthen public trust in the court, public prosecutor’s office and law enforcement authorities; (2) “Institutional Quality, Efficiency and Cooperation” with the aim to improve and develop the performance of law enforcement authorities and the education and training of law enforcement officials, promoting cooperation between law enforcement authorities, and enhancing their technological capacity and performance; (3) “Accountability for Results” with the aim to ensure monitoring over the implementation of the set objectives and recommendations made by other institutions, as well as to continuously identify current developments in the field of crime prevention and combating, and to reassess risks accordingly. This Plan is important within the context of preventing and combating corruption, as it provides for the identification of the most significant corruption risks in Latvia and the development of a common corruption prevention methodology. Likewise, it is planned within the framework of the Plan to develop the conceptual report on the modernisation of the regulatory enactments governing the prevention of conflict of interest and mitigation of corruption risks in the activities of public officials and the development of a single corruption risk analysis tool to make full use of the databases at the disposal of public administration institutions.

8) **The implementation plan for the proposals included in the performance audit of the State Audit Office “Effectiveness of Investigations and Trials of the Criminal Offences in the Economic and Financial Area”**¹⁷ (approved by the CPC on 15 April 2021) — includes 20 proposals for measures to be taken to eliminate the factors negatively affecting the efficiency of investigation and adjudication of criminal offences in the area of economics and finance. This Plan focuses on (1) developing a common understanding of the application of legal provisions, eliminating confusion about the most important circumstances to be proven and the totality of evidence required to prove guilt in criminal proceedings, (2) studying and improving the legal framework of the CL and the CPL, or introducing action mechanisms to identify legal provisions that have problems in practical application and, accordingly, to eliminate them, (3) reducing the overall workload of the system and concentrating the most qualified resources on investigating the most complex criminal proceedings and those having

¹⁴ Cabinet Order No. 49 of 11 February 2020 “On the Plan of Measures for Improving the Public Procurement System”, see: <https://likumi.lv/ta/id/312539-par-ricibas-planu-publisko-iepirkumu-sistemas-uzlabosana>

¹⁵ Information Report “On the Evaluation Report of the Working Group on Bribery in International Business Transactions, Phase 3, Latvia, its Recommendations and Provision of Their Implementation”, see: <http://tap.mk.gov.lv/lv/mk/tap/?pid=40485584&mode=mk&date=2020-04-28>

¹⁶ Crime Prevention Council Action Plan 2021-2026, see: <https://www.tm.gov.lv/lv/media/7695/download>

¹⁷ **Implementation plan for the proposals contained in the SAO performance audit “Effectiveness of Investigations and Trials of the Criminal Offences in the Economic and Financial Area”**, see: <https://www.tm.gov.lv/lv/media/7328/download>

the greatest impact on the national interests, as well as on (4) measures to ensure that the persons directing the proceedings can receive qualified ‘technical’ and advisory support at various stages of the criminal proceedings, (5) measures to improve the regulation of the operation of the public prosecutor’s office, and (6) measures to digitise criminal proceedings and improve the management of the E-case programme.

In general, this Plan contains a number of important tasks, the implementation of which will contribute to the effectiveness of anti-corruption efforts and, in line with the results, improve public trust in the Latvian judicial system and law enforcement authorities in general.

9) **“Learning and Development Plan for the Employees of the Public Administration for 2021-2027”**¹⁸ includes strategic priorities for the professional development and learning of the public administration for the period from 2021 to 2027. One of the strategic priorities of this Plan is to ensure integrity in public administration, which is also in line with the individual lines of action of the Anti-Corruption Action Plan, namely, improving human resource management in public administration, promoting ethics and reducing the risks of corruption and conflict of interest, as well as improving, maintaining and monitoring the internal control system in state and local government institutions, as well as capital companies. The Learning and Development Plan for the Employees of the Public Administration provides for a systemic, coherent and unified planning and implementation of learning and development programmes and activities for public administration, covering a broad audience: new employees, all employees of state and local government authorities, human resource management and development specialists, law enforcement officers, EU fund management specialists, middle- and lower-level managers, senior managers, as well as political officials. Specific benefits are expected from the implementation of the planned training, namely, the introduction of a values-based culture in public administration, the development of high integrity in public administration, the development of understanding of the values and ethical principles of public administration at the highest political and managerial levels, and the strengthening of the capacity of law enforcement authorities and the professional development of staff.

10) **Latvia's National Recovery and Resilience Plan** (adopted by the CM on 28 April 2021)¹⁹ — Component 6 *Rule of Law* of the Plan includes the following objectives: 1) to promote the rule of law and strengthening of the identification/detection of money laundering, fraud, financial and economic crime, and effectiveness of the courts, to strengthen additionally the involvement and professionalism of judges, public prosecutors and specialised investigators (in interdisciplinary matters) working in Latvian regions in the investigation and adjudication of economic crimes by increasing the rate of the criminal proceedings solved and transferred for criminal prosecution by at least 40%; 2) to promote the implementation of the public administration modernisation reform by strengthening public administration values, basic principles of ethics, integrity and professionalisation through the implementation of a set of systemic development measures that would facilitate the transformation of public administration towards a supportive and people-centred efficient, smart governance and the capacity of employees to effectively manage and prevent risks of conflict of interest and procurement errors, reduce corruption and the shadow economy; 3) to strengthen civil dialogue and the representation of non-governmental organisations in the field of social security by supporting the establishment, growth and development of organisations or networks of organisations to effectively represent the interests of the most vulnerable groups in public administration decision-making, as well as to promote more active non-governmental organisations in the field of public interest monitoring; 4) to increase openness and competition

¹⁸ Cabinet Order No. 562 of 13 August 2021 “On the Learning and Development Plan for the Employees of the Public Administration for 2021-2027”, see: <https://likumi.lv/ta/id/325395-par-publiskaja-parvalde-nodarbinto-macisanas-un-attistibas-planu-20212027-gadam>

¹⁹ Cabinet Order No. 292 of 28 April 2021 “On the Latvia's National Recovery and Resilience Plan”, see: <https://likumi.lv/ta/id/322858-par-latvijas-atveselosanas-un-noturibas-mehanismu-planu>
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in public procurement and reduce corruption risks by implementing a professionalisation strategy for contracting authorities and public service providers, as well as by implementing risk-based control measures. In line with these objectives, the reform and investment axes for the period 2021-2026 have been subordinated and defined.

11) **Plan of Measures for Strengthening the Proportionate Approach Complying with the Requirements on the Prevention of Money Laundering and the Terrorism and Proliferation Financing**²⁰ (approved at the meeting of the Financial Sector Development Council on 27 November 2020) — aims at promoting a single and consistent approach to cooperation between public authorities and financial institutions, to the supervision of financial transactions, and raising awareness of the shared responsibility to prevent money laundering and the financing of terrorism and proliferation while ensuring compliance with the highest international compliance standards. Action 18 of the Plan aims at ensuring adequate and active operation, actual use and culture of the mechanisms put in place by the Cooperation Coordination Group by the public authorities, law enforcement authorities and the private sector. The aim is to promote private-public cooperation in the prevention and investigation of financial, economic and corruption-related crime.

12) **Fourth National Open Government Partnership Action Plan of Latvia 2020-2021**.²¹ (adopted by the CM on 11 February 2020) — the Action Plan aims at promoting the introduction of the values of open governance, namely, openness, accountability and public participation, including through the digitisation and innovation, in Latvia. The Action Plan contains six commitments or lines of action to achieve the objectives of the plan, which Latvia commits to work on in order to promote open governance in Latvia: 1) Transparency of public procurements and contracts; 2) Opening of data sets relevant important to the freedom of information; 3) Transparency of interest representation and lobbying; 4) Open government in local governments; 5) Efficient public participation in reform processes and addressing of topical societal issues; 6) Actions for corruption prevention.

13) **Fifth National Open Government Partnership Action Plan of Latvia 2022-2025**²² (adopted by the CM on 10 February 2022) — the Action Plan aims at promoting meaningful and effective public participation in the development of balanced and quality decisions and openness and transparency in the work of public institutions in the public interest. The Plan's actions promote compliance with the internationally defined open governance values and factors that promote trust in public governance. The tasks are structured around 3 lines of action: 1) Meaningful and effective public participation in informed and quality decision-making; 2) Openness and transparency in the work of state authorities in the public interest; 3) Openness of local governments and opportunities of the public to participate in the work of their local governments.

14) **Operational Programme “Growth and Employment” of the European Union Structural Funds and Cohesion Fund for the planning period 2014-2020** (adopted by the CM on 4 February 2015). Objective 3.4.2 of the Specific Support Objective 3.4.2.1. “Professional development of public administration, development of public services and social dialogue to support small and medium-sized enterprises, prevention of corruption and reduction of shadow economy” of the Priority Axis “Competitiveness of Small and Medium-Sized Enterprises” of the Operational Programme “Growth and Employment” provides for a systemic

²⁰ MoF website, Plan of Measures for Strengthening the Proportionate Approach Complying with the Requirements on the Prevention of Money Laundering and Terrorism and Proliferation Financing, see: <https://www.fm.gov.lv/lv/pasakumu-plans-samerigas-pieejas-nostiprinasanai-izpildot-noziedzigi-iegutu-lidzeklu-legalizacijas-un-terorisma-un-proliferacijas-finansesanas-noversanas-prasibas>

²¹ Cabinet Order No. 54 of 11 February 2020 “On the Fourth National Open Government Partnership Action Plan of Latvia 2020-2021”, see: <https://likumi.lv/ta/id/312544-par-latvijas-ceturto-nacionalo-atvertas-parvaldibas-ricibas-planu-20202021-gadam>

²² Cabinet Order No. 78 “On the Fifth National Open Government Partnership Action Plan of Latvia 2022-2025”, see: <https://likumi.lv/ta/id/329905-par-latvijas-piekto-nacionalo-atvertas-parvaldibas-ricibas-planu-2022-2025-gadam>

and targeted approach to planning and organising of training, with a particular focus on strengthening the administrative capacity of public administration institutions directly responsible for improving the business environment and contributing to reducing corruption and the shadow economy. Section III of the Anti-Corruption Action Plan includes measures implemented within the framework of the European Social Fund project No. 3.4.2.0/15/I/002 “Professional Development of Public Administration Human Resources in the Field of Prevention of Corruption and Reduction of the Shadow Economy”.

15) The **United Nations 2030 Agenda for Sustainable Development** sets as Goal 16 “**to promote peaceful and inclusive societies for sustainable development, ensure access to justice for all and build effective, accountable and inclusive institutions at all levels**”. This includes a sub-goal to significantly reduce all forms of corruption and bribery (sub-goal 16.5) and develop effective, accountable and transparent institutions at all levels (sub-goal 16.6)²³.

The development of the Anti-Corruption Action Plan takes into account proposals made by the direct public administration institutions, their subordinate or supervisory bodies, as well as Latvian non-governmental organisations. Furthermore, the requirements and recommendations of international organisations included in various documents have been complied with:

1) Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law²⁴;

2) European Parliament resolution of 24 October 2017 on legitimate measures to protect whistleblowers acting in the public interest when disclosing the confidential information of companies and public bodies (2016/2224(INI))²⁵;

3) GRECO's Fourth Evaluation Round Report “Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors” (adopted on 7 December 2012)²⁶;

4) GRECO's Fifth Evaluation Round Report “Preventing Corruption and Promoting Integrity in Central Governments (Top Executive Functions) and Law Enforcement Agencies”²⁷ (adopted on 22 June 2018).

The content of the Plan is also based on the laws adopted by the Saeima on accession of the Republic of Latvia to international treaties (conventions) that provide for certain obligations of the State in the fight against corruption. Conventions binding on Latvia:

1) The United Nations Convention against Corruption of 31 October 2003 (entered into force in the Republic of Latvia on 3 February 2006);

2) Convention drawn up on the basis of Article K.3(2)(c) of the Treaty on European Union on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union (entered into force in the Republic of Latvia on 1 May 2004);

²³ The United Nations, 2030 Agenda for Sustainable Development, Goal 16 (sub-goals 16.5, 16.6), see: <https://sustainabledevelopment.un.org/post2015/transformingourworld>

²⁴ Official Journal of the EU, Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, see: <https://eur-lex.europa.eu/legal-content/LV/TXT/PDF/?uri=CELEX:32019L1937&from=LV>

²⁵ European Parliament resolution of 24 October 2017 on legitimate measures to protect whistleblowers acting in the public interest when disclosing the confidential information of companies and public bodies (2016/2224(INI)), see: <https://op.europa.eu/lv/publication-detail/-/publication/5c4565d3-c1ea-11e8-8bb4-01aa75ed71a1/language-lv/format-PDF/source-122358772>

²⁶ GRECO's Fourth Evaluation Round Report. Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors (2012), see: <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806c6d36>

²⁷ GRECO's Fifth Evaluation Round Report. Preventing Corruption and Promoting Integrity in Central Governments (Top Executive Functions) and Law Enforcement Agencies (2018), see: <https://rm.coe.int/piekta-novertesanas-karta-korupcijas-noversana-un-integritates-veicina/16808d5a3a>
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- 3) Council of Europe Criminal Law Convention on Corruption (entered into force in the Republic of Latvia on 20 December 2000);
- 4) Additional Protocol to the Criminal Law Convention on Corruption (entered into force in the Republic of Latvia on 30 June 2006);
- 5) Council of Europe's Civil Law Convention on Corruption of 4 November 1999 (entered into force in the Republic of Latvia on 9 March 2005);
- 6) Council of Europe's Agreement establishing the Group of States against Corruption (GRECO) (entered into force in the Republic of Latvia on 30 June 2000);
- 7) OECD Convention (entered into force in the Republic of Latvia on 21 March 2014).

III Objectives and Lines of Action of the Plan

Objective of the Plan	To ensure credible functioning of any institution or organisation in line with the principle of good institutional governance and effective management of human resources.				
Policy outcome and performance indicators	Developed inter-institutional cooperation, increasing the effectiveness of preventing and combating corruption.				
	Progress performance indicator	Unit	Year	Projected performance indicator	Planning document
	Corruption Perceptions Index	points	2024	64	NDP
	Citizens' political trust index (Saeima/law enforcement system/police/political parties/European Parliament/UN)	Scale 0-10	2024	3.5	NDP
	Political trust index 1) The Saeima; 2) CM; 3) local government of a county/city; 4) political parties	%	2024	1) 23.1 2) 25.5 3) 59.6 4) 13.8	NDP
	Trust in the law enforcement system 1) courts; 2) the prosecution office; 3) police	%	2024	1) 45.5 2) 45.8 3) 62.0	NDP
	Public administration performance index	%	2030	>95	Latvia 2030

Sub-objective 1: To ensure such public administration human resources management policy that excludes motivation for corrupt behaviour

This sub-objective of the Anti-Corruption Action Plan contains two main lines of action:

- 1 Line of action: Review of the circle of persons subject to preventive anti-corruption measures;
- 2 Line of action: Improvement of human resource management in public administration, promoting ethics and reducing the risks of corruption and conflict of interest.

Public administration has undergone significant changes and development over the past policy planning period 2015-2020. There has been a growth in public officials' understanding of their legal status, rights, duties and liability. This has been facilitated by targeted and

intensive awareness-raising activities for the staff of state and local government institutions²⁸ on anti-corruption, conflict of interest prevention, public administration ethics, internal control and corruption risk prevention, as well as on the implementation of the OECD Convention and other topics, including lobbying, corruption risks in medicine, in part of the training events successfully using the support and funding opportunities of the European Social Fund project No. 3.4.2.0/15/I/002 “Professional development of public administration human resources in the field of prevention of corruption and reduction of the shadow economy”, implemented by the LSPA, where KNAB acted as a strategic cooperation partner and content supervisor.

Within the framework of the implementation of the educational function, KNAB increasingly uses and will continue to develop interactive online learning methods.

By focusing on measures to strengthen the internal control of institutions in anti-corruption matters, Latvia is gradually moving towards the goal of reducing the need for the external control of institutions. For example, a programme for the training of further educators on anti-corruption issues in public institutions has been introduced in Latvia since 2015 in and methodological support for further educators is provided. however, the work is to be continued also in the coming years.

By adopting Cabinet Recommendation No. 1 of 21 November 2018 “Values and Ethical Principles of the Public Administration”²⁹, a common understanding of the values of the public administration and the ethical principles based thereon, as well as the appropriate action to be taken has been strengthened. In order to increase public trust in state and local government institutions in general and to promote good governance, it is essential both to strengthen the internal anti-corruption control system and integrate the values of the public administration and ethical principles in the daily work of staff of state and local government institutions in the coming years. At the end of 2020, a Eurobarometer survey carried out³⁰ showed that most people (38%) distrust the Saeima and its members, believing that most or even all people in that institution are corrupt. Equally high levels of distrust were expressed towards Latvian government officials (30%) and local government representatives (including mayors) (30%). Regaining public trust in these authorities will therefore be a difficult challenge in the coming years. This could be facilitated by greater involvement and support of the legislator (the Saeima), first, in implementing international recommendations binding on Latvia, second, in promoting internal anti-corruption initiatives, and third, in implementing the Saeima self-regulation, addressing actual and potential conflicts of interest and punishing those who do not comply with the ethical standards of conduct.

Over the past six years, KNAB has constantly monitored the practice of application of the PCIL, as well as the problematic issues to which KNAB has responded both by providing explanations to public officials on the application of specific legal provisions and by amendments to the PCIL that have been proposed in the Saeima. At the same time, the SRS has improved the methodology for verifying declarations of public officials, as well as carried out informational work to facilitate the correct completion of declarations of public officials in the EDS. According to the information available to the SRS, 57,684 persons were public officials in Latvia in 2020³¹.

²⁸ During the period between 2015 and 2020, KNAB conducted 624 educational events, educating 33,442 people, including public officials and employees, among them civil servants, heads and deputy heads of institutions, chairpersons and deputy chairpersons of local government councils, executive directors, heads of municipal parish administrations, members of parliament, members of procurement commissions, foreign students and business people.

²⁹ Cabinet Recommendation No. 1 of 21 November 2018 “Values and Ethical Principles of the Public Administration”, see <https://likumi.lv/ta/id/303328-valsts-parvaldes-vertibas-un-etikas-pamatprincipi>

³⁰ *Transparency International* website, Global Corruption Barometer — EU 2021. European citizens' views and experiences of corruption, see: <https://www.transparency.org/en/news/gcb-eu-2021-survey-people-worry-corruption-unchecked-impunity-business-politics>

³¹ Information of the State Revenue Service
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The new policy planning period will be important for an in-depth analysis and reassessment of the PCIL. Within the framework of the Technical Assistance Facility of the European Commission's Directorate General for Structural Reform Support, in the project "Strengthening the Anti-Corruption Framework in Latvia", OECD experts will conduct an in-depth analysis of the compliance of the PCIL with international standards and good practices in 2023. The tasks included in this section of the Anti-Corruption Action Plan are purposefully planned to strengthen a common practice with regard to the application of the status of public official to employees of public person's institutions in the coming years by clarifying the characteristics by which the employee should be assigned the status of public official in a public person's institution. At the same time, implementation of the tasks contained in the Plan will contribute to the proportionality and validity of the restrictions imposed by the PCIL on public officials.

Significant impact on the social and economic environment in the long term is expected from government decisions, orders, regulations and other laws related to the containment of the Covid-19 pandemic and the establishment of nationwide epidemiological safety measures from March 2020 onwards. This emergency situation, which has led to an economic downturn in Latvia and a significant increase in the number of unemployed people³², may create tensions in the labour market, as well as encourage the use of acquaintances and connections to obtain paid employment in highly competitive conditions, including in state and local government institutions. Similarly, the unusual and at the same time difficult conditions caused by the global Covid-19 pandemic, as companies struggle to find markets for their goods and services, may be the basis for increased corruption risks in public procurements of the state and local government institutions.

The authorities involved in the implementation of the Anti-Corruption Action Plan are committed to continue their work on improving staff management, promoting high ethical values and principles and reducing the motivation of individuals to engage in fraudulent or illegal activities to satisfy their personal interests.

Based on proposals from public authorities and non-governmental organisations to improve the management of human resources in public administration, to put ethical conduct into practice, and to address the risks of corruption and conflict of interest, the Anti-Corruption Action Plan sets out the following tasks:

- To raise awareness among young public officials and to maintain the knowledge of experienced public officials on measures for the prevention of corruption and conflict of interest implemented by their employers and standards of ethical behaviour;
- To develop cooperation with educational institutions for the early transfer of anti-corruption policy ideas to society;
- To implement new approaches to embed the values and ethical principles of public administration;
- To continue the training of public institutions' anti-corruption trainers and competence development.

³² Data collected by the State Employment Agency shows that, at the end of February 2020, a total of 58,247 unemployed people were registered in Latvia, while at the end of June 2020 the number of registered unemployed had increased by 20,019 to a total of 78,266, see: https://www.nva.gov.lv/sites/nva/files/content/270720/parskats-par-bezdarba-situaciju_junijs_2020.pdf
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Measures to be implemented within the framework of Sub-objective 1

1 Line of action		Perfection, explanation, application of the PCIL provisions and review of the circle of persons subject to preventive anti-corruption measures;				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
1.1.	Provision of a data-driven basis for further development of the Law on Prevention of Conflict of Interest in Activities of Public Officials by conducting assessment thereof and responding to developments in public administration while ensuring proportionate, justified and effective measures to prevent conflict of interest situations in activities of public officials. <i>(link to Action No. 1.1.3 of the Crime Prevention Council Action Plan 2021-2026 and Performance Indicator No. 3)</i>	An independent study has been carried out and conclusions have been drawn on the shortcomings, gaps and possible areas for improvement of the Law on Prevention of Conflict of Interest in Activities of Public Officials.	A study has been carried out, new information has been obtained for further development of laws and regulations.	KNAB	–	30.12.2023
1.2.	To ensure that the interpretation of the legal provisions contained in the Law on Prevention of Conflict of Interest in Activities of Public Officials is clear to public officials and the society.	A summary of explanations on the nature and application of restrictions, prohibitions and obligations imposed on public officials by the Law on Prevention of Conflict of Interest in Activities of Public Officials.	Explanations of the provisions of law are made public.	KNAB	–	constantly
1.3.	To ensure uniform practice in the application of the status of public official to employees of public person's institutions.	Guidelines for heads of public person's institutions have been drawn up, explaining the characteristics by which the employee should be assigned the	1) Guidelines have been developed; 2) The number of discrepancies found in the lists of public	SRS	KNAB	31.03.2023

		status of public official in a public person's institution.	officials submitted by institutions is decreasing.			[completed ³³]
1.4.	To review the range of public officials in the National Armed Forces, institutions of the Ministry of the Interior system and the Prison Administration in accordance with the assessment of the functions to be performed by the employees.	Conformity of persons employed to the status of public official has been assessed in the determined institutions and, if necessary, proposals for amendments to the Law on Prevention of Conflict of Interest in Activities of Public Officials have been prepared.	1) Amendments to the Law on Prevention of Conflict of Interest in Activities of Public Officials prepared and submitted to the Cabinet of Ministers; 2) Numerical changes in the lists of public officials in the National Armed Forces, the institutions of the Ministry of the Interior system and the Prison Administration	KNAB	MoF (SRS), MoD, MoI, MoJ	31.12.2025

³³ The SRS in cooperation with KNAB has developed an information material "On Application of Section 4, Paragraphs Two and Three of the Law on Prevention of Conflict of Interest in Activities of Public Officials in Determining the Status of a Public Official", 27.12.2022, see https://www.vid.gov.lv/lv/media/14268/download?attachmentR3541_3_pl_prec

1.5.	To improve the EU funds management and control system in order to mitigate the risks of conflict of interest.	In line with the results of the audit of the EU funds management and control system No. SA/ESIF/2020/10, the report on mitigating measures against conflict of interest in the Ministry of Finance as the managing authority for EU Funds and in the Central Finance and Contracting Agency as the co-operation authority for EU Funds, the EU funds management and control system has been improved to mitigate the risks of conflict of interest.	1) Assessment has been conducted, and recommendations have been provided on necessary amendments to external laws and regulations and/or internal norms of the institutions improving the EU funds management and control system to mitigate conflict of interest; 2) Implementation of the recommendations made within the framework of the assessment according to the agreed timetable for the implementation of the recommendations.	1) Audit authority; 2) According to an agreed timetable for implementing the recommendations	—	Deadline for implementation of the recommendations made within the framework of the assessment approved on 29.11.2021 — according to the agreed timetable for implementation of the recommendations. [work in progress ³⁴]
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³⁴ Implementation of the recommendations proposed within the framework of the assessment is ongoing. 18 recommendations were made in total, 2 recommendations were included in the report for information and 1 recommendation was implemented during the audit harmonisation. The audit report also contains 7 unharmonised recommendations, 2 of which have been implemented, and the implementation of 5 recommendations has been commenced; 10 recommendations are currently being implemented and 1 recommendation has been implemented partially; 4 recommendations have not been implemented fully (2 of them have been implemented partially) due to the pending receipt of the EC's reply letter on the approach to the Audit Authority's questions, thus extending the implementation deadline; 3 recommendations have not been implemented, one of them is not due for implementation.

1.6.	To ensure a conflict of interest management system for persons acting as freelance advisory staff to the Members of the Cabinet of Ministers. (link to GRECO's Fifth Evaluation Round Report, recommendation No. ix. / i))	The provisions of Cabinet Regulation No. 495 of 18 May 2004 "Regulations on the Status and Competence of a Freelance Advisory Staff to a Member of the Cabinet of Ministers" has been assessed and proposals for amendments to the laws and regulations have been prepared to ensure the prevention of conflicts of interest in the activities of freelance consultants of the Cabinet of Ministers.	Proposals for amendments to the regulatory framework prepared and submitted to the Cabinet of Ministers	SC, KNAB	–	31.03.2023 [completed ³⁵]
1.7.	To review the general restrictions on the combination of public officials' offices set out in Section 6 of the Law on Prevention of Conflict of Interest in Activities of Public Officials, ensuring that the restrictions are proportionate and consistent with the purpose of the Law.	The restrictions on combining public officials' duties, as set out in Section 6 of the Law on Prevention of Conflict of Interest in Activities of Public Officials, including the possibility of combining public official's duties, for example, with the duties of a member of the Parents' Council of an educational institution, have been assessed.	Necessary amendments to the regulatory framework have been prepared and submitted to the Cabinet of Ministers	KNAB	SRS, MoJ	30.06.2024
1.8.	To ensure responsible, transparent and ethical conduct of scientific commercial activity by medical institutions	An assessment of the scientific commercial activity practices of Latvian medical institutions and the involvement of medical staff	Informational report prepared and submitted to the Cabinet of Ministers	MoH	–	29.12.2023

³⁵ On 22 November 2022, Cabinet Regulation No. 728 "Amendments to Cabinet Regulation No. 495 of 18 May 2004 "Regulations on the Status and Competence of a Freelance Advisory Staff to a Member of the Cabinet of Ministers"", which stipulates that a freelance consultant shall immediately inform a Member of the Cabinet of Ministers in writing if his or her objectivity and neutrality may be questioned due to personal or financial interests or ethical considerations, as well as shall not undertake a given duty or a given task or shall immediately cease to perform it if these circumstances are detected during the fulfilment of the given duty or task.

		in research (organisation, financing and monitoring of research activities) has been performed, providing proposals to ensure the transparency of doctors' research and improve the financing procedure.				
1.9.	To propose the Saeima to review and update the <i>Code of Ethics</i> for the Members of the Saeima and supplement it with practical measures to provide appropriate guidelines and recommendations to the Members of the Saeima on the legal framework related to ethics, conflicts of interest and the prevention of corruption (<i>link to GRECO's Fourth Evaluation Round Report, recommendation No. iii.</i>)	Recommendations have been developed to the Saeima on improvements and amendments to the existing Code of Ethics for the Members of the Saeima.	Recommendations have been drafted and sent to the Saeima	SC, KNAB		31.12.2023
1.10.	To take measures to introduce an effective 'cooling-off' period for public administration employees.	An assessment of the current situation regarding the 'cooling-off' period in public administration, its implementation and compensatory mechanisms has been performed. Following the examination of international experience, proposals have been made for possible legal solutions to develop control mechanisms.	Informational report prepared and submitted to the Cabinet of Ministers	SC, MoW, KNAB	—	01.03.2024
		Legal framework has been developed for the introduction and monitoring of a 'cooling-	Amendments to the regulatory			01.07.2025

		off" period for public administration employees, while defining the situations in which 'cooling-off' applies.	framework have been developed			
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2 Line of action		Improvement of human resource management in public administration, promoting ethics and reducing the risks of corruption and conflict of interest				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
2.1.	Establishing cooperation with higher education institutions on the development and implementation of an optional study course within the framework of the implementation of the healthcare field of study.	A cooperation agreement has been signed with Latvian institutions of higher education on the implementation of an optional study course on risks of corruption and their prevention in the healthcare system.	Cooperation agreement has been concluded	KNAB, MoH, Riga Stradiņš University, University of Latvia	–	01.07.2025
2.2.	To implement the basic ethical principles and values of public administration set out in Cabinet Recommendation No. 1 of 21.11.2018 "Values and Ethical Principles of the Public Administration". <i>(link to the Learning and Development Plan for the Employees of the Public Administration 2021-2027, Action 1.1)</i>	2.2.1. A training module has been developed on basic ethical principles for the employees of public administration, including new recruits, with the inclusion of game elements.	1) An e-course has been developed on the mission and values in public administration; 2) Interactive game of ethics	SC, LSPA	–	01.07.2023 [ongoing ³⁶]
		2.2.2. A study on the practice of applying codes of ethics in public institutions has been conducted.	A study has been conducted	SC		30.12.2024

³⁶ In 2022, the development of the E-learning course "Mission and Values in Public Administration" was completed; 2) In 2022, work on the educational interactive game "Ethical Values for the Employees of Public Administration".

2.3.	To continue preparation of further educators on anti-corruption issues in public institutions, as well as to provide methodological support for full performance of functions of further educators in their institutions.	1) A basic training course has been ensured for further educators (for the new further educators); 2) A professional development course has been ensured for further educators (for further educators with previous experience).	1) Number of training events, number of further educators trained; 2) Number of training events, number of further educators trained	KNAB	–	(1) once a year; (2) at least once a year [ongoing ³⁷]
2.4.	To identify international trends in the declaration of the financial status of senior public officials, including the role of family income declarations in assessing the actual financial status of public officials and potential conflicts of interest.	International practice in the declaration of the financial status of senior public officials has been summarised, identifying a potential group of persons (relatives) whose disclosure of their financial status in the declaration of a public official is relevant for determining the actual financial status and interests of the public official him-/herself.	An assessment with proposals for further improvement of the income declaration system for public officials has been prepared	KNAB	–	31.12.2025
2.5.	To develop objective and transparent criteria to determine the integrity and compliance of police and border guard officers	Uniform, objective and clear criteria for assessing the integrity and compliance of police and border guard officers	Amendments to laws and regulations	MoI, SP, SBG	–	30.12.2023 [completed] ³⁸

³⁷ In 2021 and 2022, the necessary methodological support has been provided for further educators on anti-corruption issues throughout Latvia. In May 2022, KNAB hosted a workshop training 26 new further educators.

³⁸ On 21 June 2022, the Cabinet of Ministers adopted “Amendments to Cabinet Regulation No. 845 of 20 December 2016 “Procedure for Performance and Results Evaluation of Ministry of the Interior System Institutions and Prison Administration Officers with Special Service Ranks”, improving and perfecting the evaluation of Ministry of the Interior System institutions and Prison Administration officials with special service ranks. In line with the recommendation of the GRECO report on Latvia: “To elaborate objective and transparent criteria for ascertaining the integrity of police and border guard staff, and their compliance with the applicable code of ethics, and to form them as part of periodic performance reviews”, the adopted amendments provide for specific performance indicators for the competence “Ethics”, taking into account the requirements of ethical standards, as well as stipulate the competence “Integrity” to be assessed mandatorily.

	with the applicable code of ethics and include them in periodic performance evaluations. (link to GRECO's Fifth Evaluation Round Report, recommendation No. xiv.)	with the applicable code of ethics have been developed.				
2.6.	To ensure a knowledge training seminar for the Members of the Saeima on matters concerning the prevention of the conflict of interests, including matters of ethics.	Support has been provided for training of the Members of the Saeima and analysis of previous ethical breaches.	One educational event has been implemented	KNAB	—	14 Beginning of the parliamentary term [completed ³⁹]

³⁹ On 25.11.2022, KNAB in cooperation with the society Transparency International LATVIA, DELNA implemented an online educational event for the Members of the 14th Saeima. KNAB has educated the members of parliament on the restrictions and prohibitions set for this group of public officials, as laid down in the PCIL. On 28.11.2022, an offer to organise a meeting/consultation within the framework of a fraction was sent to all the fractions of the Saeima regarding: 1 Restrictions imposed by the PCIL (KNAB) 2. Aspects of the use of certain indemnities available to the members of parliament (KNAB) 3. Topical issues in the fight against corruption (Transparency International LATVIA, DELNA) R3541_3_pl_prec

Indicators characterising the achievement of Sub-objective 1

To ensure such a human resources management policy in public administration that excludes motivation for corrupt behaviour

No.	Performance indicator	Unit	Base year	Base year value	Target value 2023	Target value 2025	Data source
1.1.	Government effectiveness	%	2020	76.92	80	88	<i>The Worldwide Governance Indicators</i>
1.2.	Number of persons trained in educational events organised by KNAB	Number	2020	6,060	6800	7300	KNAB
1.3.	Number of people trained on anti-corruption topics in the EU-funded activities	Number	2020	1854	7,000 ⁴⁰	11500 ⁴¹	LSPA
1.4.	Number of persons trained (further educators)	Number	2020	0	85	95	KNAB

⁴⁰ 3,500 persons trained within the framework of Investment 6.3.1.1.i. “Open, Transparent, Fair and Accountable Public Administration” of reform and investment axis 6.3 “Modernisation of Public Administration” of Component 6 “Rule of Law” of the EU Recovery and Resilience Facility Plan, and 3,500 persons trained in e-learning courses developed within the framework of the ESF project “Professional Development of Public Administration Human Resources in the Field of Prevention of Corruption and Reduction of the Shadow Economy”.

⁴¹ 9,500 persons trained within the framework of Investment 6.3.1.1.i. “Open, Transparent, Fair and Accountable Public Administration” of reform and investment axis 6.3 “Modernisation of Public Administration” of Component 6 “Rule of Law” of the EU Recovery and Resilience Facility Plan, and 2,000 persons trained in e-learning courses developed within the framework of the ESF project “Professional Development of Public Administration Human Resources in the Field of Prevention of Corruption and Reduction of the Shadow Economy”.

Sub-objective 2: To establish and improve an autonomously and continuously operating internal control system that limits to the maximum extent the possibilities of emergence of corruption and defrauding of funds, including the EU and other foreign funds in the state, local government or private sector

This sub-objective of the Anti-Corruption Action Plan contains four main lines of action:

- 3 Line of action: Perfection, maintenance and monitoring of the internal control system in the state and local government institutions and capital companies;
- 4 Line of action: Ensuring the lawfulness of the use of public property and financial resources, including EU funds and other foreign financial aid instruments;
- 5 Line of action: Strengthening of integrity and prevention of corruption risks among the judiciary and its related officials;
- 6 Line of action Implementing anti-corruption measures in the private sector.

In order to ensure a common understanding of the basic requirements for the establishment of an internal control system to prevent the risk of corruption and conflict of interest in institutions, Cabinet Regulation No. 630 of 17 October 2017 was adopted⁴², and, in January 2018, guidelines on the basic requirements for an internal control system to prevent the risk of corruption and conflict of interest in an institution were approved by a resolution of the Director of KNAB⁴³. The guidelines have been developed to provide recommendations, methodological assistance and examples for the prevention of risks of corruption and conflict of interest by implementing the basic requirements set out in the above mentioned Cabinet Regulation No. 630 of 17 October 2017.

During the past policy planning period 2015-2020, KNAB has followed the dynamics of the development of the internal anti-corruption control system of institutions. Three information reports on the assessment of the internal anti-corruption control system in institutions have been prepared⁴⁴, reflecting the current situation in the field of internal anti-corruption control in state and local government institutions, including capital companies, in 2015, 2017 and 2019. In 2019, at least 80% of ministries and their subordinate institutions had an internal anti-corruption control system in place. It has been concluded that, during the period from 2015 to 2019, the number of local governments with anti-corruption procedures in place has increased by 66%. In 2019, 90 out of 119 local governments had ready developed anti-corruption action plans⁴⁵. Although the number of local governments with an anti-corruption action plan and internal anti-corruption control systems has significantly increased, during the coming years (after the administrative-territorial reform of Latvia in 2021), institutions should pay special attention to informing and raising awareness among their employees about the anti-corruption measures

⁴²Cabinet Regulation No. 630 of 17 October 2017 “Regulations Regarding the Basic Requirements for an Internal Control System for the Prevention of Corruption and Conflict of Interest in an Institution of a Public Person”, see: <https://likumi.lv/ta/id/294518-noteikumi-par-ieksejas-kontroles-sistemas-pamatprasibam-korupcijas-un-interesu-konflikta-riska-noversanai-publikas-personas-institucija>

⁴³ Guidelines on the basic requirements for an internal control system to prevent the risk of corruption and conflict of interest in an institution of a public person, see: <https://www.knab.gov.lv/lv/search?q=Vadl%C4%ABnijas%20&types=file&page=1>

⁴⁴ See 1) Information Report of 29 January 2016 “On the Assessment of the Internal Anti-Corruption Control System in Institutions of a Public Person” (CM reg. No. 2016-TA-102); 2) Information Report of 19 July 2018 “On the Assessment of the Internal Anti-Corruption Control System in Institutions of a Public Person” (CM reg. No. 2018-TA-1453); 3) Information Report of 29 June 2020 “On the Assessment of the Internal Anti-Corruption Control System in Institutions of a Public Person” (CM reg. No. 2020-TA-1104)

⁴⁵ KNAB website, Information Report of 29 June 2020 “On the Assessment of the Internal Anti-Corruption Control System in Institutions of a Public Person” (CM reg. No. 2020-TA-1104), page 19, see: <https://www.knab.gov.lv/lv/media/1511/download>

they are implementing and the role of each employee in them, thus increasing the effectiveness of the internal control system. During the next policy planning period, various informational support measures are planned: 1) to promote the reorientation of external control towards internal control by increasing the accountability of departments and institutions (heads) and strengthening their internal anti-corruption control system; 2) to ensure a uniform and clear model of conduct of public officials in situations where a bribe is offered or given to a public official.

Significant progress has also been achieved in the area of healthcare to improve the internal anti-corruption control system. On 10 December 2019, Cabinet Regulation No. 642 “Amendments to Cabinet Regulation No. 555 “Procedures for the Organisation of and Payment for Health Care Services”” was adopted, which stipulates that, from 1 January 2022, state-funded healthcare services may be provided only by healthcare providers that have an internal anti-corruption control system in place. The aforementioned condition applies to private outpatient medical treatment institutions that provide state-funded healthcare services in at least five types of services. Whereas, on 28 October 2021, based on MoH Order No. 214, guidelines on the basic requirements for an internal control system to prevent the risk of corruption and conflict of interest in private outpatient medical treatment institutions were approved. The Guidelines for private outpatient medical treatment institutions have been developed to provide recommendations, methodological assistance and examples on how to establish, improve and maintain an internal anti-corruption control system. The Guidelines were developed by an inter-institutional work group, which included representatives of the MoH, KNAB, the National Health Service, and the Association of Healthcare Employers.

During the previous planning period, KNAB has worked to define the basic requirements of the internal anti-corruption control system in the laws and regulations, as well as provided methodological support for the implementation of the system in institutions. Within the framework of the European Commission's Directorate General for Structural Reform Support Technical Assistance Facility, in the project “Strengthening the Anti-Corruption Framework in Latvia”, in 2023 and 2024, the OECD experts will assess the existing laws and regulations governing the basic requirements for internal control systems to prevent the risk of corruption and conflict of interest in public institutions in line with international standards and good practice, as well as develop a methodology for the assessment of the quality of their implementation in institutions of a public person.

The Anti-Corruption Action Plan 2023-2025 includes measures to develop and maintain the internal control environment as a set of management policies and procedures in the public sector, reducing possibilities to circumvent the ICS or exploit its weaknesses. Improving the ICS is one of the most effective ways to reduce risks of corruption in state and local government institutions or private companies entrusted with the implementation of public functions in a given area.

The risks of corruption in the field of public procurements and in the disposal of public funds and property by officials remained high, which is why methodical training is still topical for procurement specialists, as well as for officials who are temporarily included in the procurement commission, to reduce irregularities in procurement procedures (including in projects co-financed by the EU), as well as to develop their capacity to identify, in a preventive manner, any possible illegal activities of tenderers in the process of preparation of bids (e.g., cartel formation), thereby preventing the further support of dishonest business practices with state and local government funds in the event contracts are concluded. On 11 February 2020, the CM adopted Order No. 49 “On the Action Plan for Improving the Public Procurement System”, which includes a set of measures to improve the public procurement process, including the reduction of risks of corruption.

Progress has been achieved in strengthening the control of activities of the officials responsible for handling public resources, including administrative liability for inexpedient

(wasteful) use of public property and financial resources by public officials. By the amendments to Section 18 of the PCIL (entered into force on 17 June 2015), it has been stipulated that the property and financial resources of a institution shall be used and applied only for the purposes provided for in the external laws and regulations, as well as in accordance with the statutory procedures. Also, in order to promote the lawful management of public sector funds and property, as well as to ensure that persons employed in the public sector compensate the State for losses caused by their unlawful conduct, on 20 June 2019, amendments to the Law on the State Audit Office were adopted (entered into force on 1 August 2019). The amendments to the above-mentioned law stipulate that the SAO Council has the right to recover damages caused by a person's unlawful conduct, as revealed in an audit of the SAO.

As part of the efforts to ensure the legality of the use of public property and financial resources, a national budget programme “Foundation for Non-Governmental Organisations” has been established⁴⁶. The aim of this national budget programme is to promote transparency in the allocation of public funds to NGOs, ensuring equal access to public financial support for all applicants, as well as transparent monitoring of the use of the funding allocated. The Society Integration Foundation has been designated as the administrator of the Foundation for NGOs, which has a procedure for the redistribution and monitoring of public funding to beneficiaries in the non-governmental sector.

In the coming years, work should be continued to strengthen integrity and prevent risks of corruption among the judiciary and its officials. During the period from 2015 to 2020, discussions, trainings, and conferences on judicial ethics have been held. Not only education and professional development in anti-corruption matters, but also the strengthening of internal controls, should be continued. On 2 February 2021, a new Code of Conduct of Judges was approved at the Remote Conference of Latvian Judges.

Closer cooperation with local governments in planning anti-corruption measures, strengthening the internal control system and increasing the competence of local government staff in anti-corruption matters should be promoted.

In order to promote the legality of the use of public property and financial resources, including EU funds and other foreign financial aid instruments, it has been planned for the new development planning period:

- To ensure an open, transparent and uniform criteria-based procedure for the allocation of public funding to Latvian sports organisations.
- To raise awareness among private sector representatives of the risks of corruption and other signs of illegal activities in public procurement procedures, as well as the necessary actions to prevent possible illegal activities of the contracting authority or other tenderers.

⁴⁶ Cabinet Order No. 792 of 16 December 2015 “On the Conceptual Report “On the Establishment of a State-Funded Foundation for Non-Governmental Organisations””, see https://likumi.lv/ta/id/278602-par-konceptualo-zinojumu-par-valsts-finanseta-nevalstisko-organizaciju-fonda-izveidi-R3541_3_pl_prec

Measures to be implemented within the framework of Sub-objective 2

3 Line of action		Improvement, maintenance and monitoring of the internal control system in state and local government institutions and capital companies				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
3.1.	Ensuring knowledge enhancement and experience sharing activities for institutions of a public person on the implementation, maintenance and development of the internal control system, including examples of the best practice in the public and private sectors.	3.1.1. An event to exchange experience on the implementation and improvement of the internal anti-corruption control system has been organised.	1 event	KNAB	–	31.03.2023 [completed ⁴⁷]
		3.1.2. Training and experience-sharing activities have been organised on the implementation/improvement of internal anti-corruption control systems, including in the area of development of risk management.	1) An e-learning course has been developed; 2) Two educational, experience-sharing events have been organised.	LSPA, KNAB	–	1) 31.03.2023 [completed ⁴⁸] 2) 31.12.2025

⁴⁷ On 30.11.2022, KNAB in cooperation with the State Joint-Stock Company Valsts nekustamie īpašumi organised an experience exchange event for further educators on anti-corruption issues and representatives of institutions responsible for ensuring the anti-corruption internal control system. 38 participants took part. Likewise, on 24.08.2022, KNAB organised an online training on the assessment of risks of corruption and development of an anti-corruption action plan. The awareness-raising event was attended by representatives of both the public and private sectors, including stakeholders from state and local government capital companies.

⁴⁸ The LSPA has developed an e-learning course “Establishing an internal anti-corruption control system in an institution”. The course consists of separate sub-courses: for participants with no to little prior knowledge and experience and for participants with prior knowledge and experience, as well as a sub-course for managers. The e-learning course will be made available to users in January 2022.

3.2.	To ensure a common pattern of conduct for public officials in a situation where a bribe is promised, offered or given to a public official.	3.2.1. The methodological recommendations for law enforcement authorities and security institutions on how to act in a situation where a bribe is promised, offered or given to a public official have been updated, and officials of law enforcement authorities and security institutions have been informed on how to act in a situation where a bribe is promised, offered or given to a public official.	Methodological recommendations have been updated and sent to law enforcement authorities	KNAB	SP, SBG, SSS, SRS, MP, LPA, PGO, FIU, ISB	01.07.2023
		3.2.2. Methodological recommendations have been prepared for institutions of a public person on how to deal with a situation where a bribe is promised, offered or given to a public official.	1) Methodological recommendations for institution of a public person have been prepared and distributed;	KNAB	—	30.11.2023
			2) Infographics has been developed and published (on the institutions' websites) — scenarios for the right action	KNAB	—	30.11.2023

3.3.	To reduce risks of corruption in the field of construction control, to ensure an open and legal construction process throughout the territory of Latvia, preventing possible arbitrariness in the implementation of the construction process in local governments.	3.3.1. A legal framework has been provided for video recording of inspections to be conducted during the construction process or of the process of commissioning of structures using a video camera during site visits.	Amendments to the regulatory framework	MoE		30.12.2023
		3.3.2. An assessment has been performed with regard to the cooperation between the Ministry of Economics and the Corruption Prevention and Combating Bureau to detect corruption offences in the construction sector.	Cooperation between the MoE and KNAB has been improved.	MoE, KNAB	–	30.12.2023
		3.3.3. An analysis of the implementation of construction procedures and monitoring practices has been performed: 1) in local governments, identifying the existing current problems in the field of construction supervision and control, including in the activities of construction specialists involved in the construction process (Section 13 of the Construction Law) (risks	Informational report prepared and submitted to the Cabinet of Ministers	MoE, KNAB	MoEPRD (in the area of supervision of local governments)	01.11.2024

		of corruption and conflict of interest); 2) the ‘tools’ available to local governments, MoEPRD, MoE and SCCB, and their effectiveness for the prompt prevention of illegal acts/omissions); 3) offering solutions to eliminate shortcomings, if any identified.				
3.4.	To strengthen internal control measures in courts by promoting a common understanding of the functioning of the internal corruption control system.	An evaluation has been performed with regard to the effectiveness of the implementation of the handbook on measures to prevent risks of corruption in courts and possible improvements to the content of the handbook.	The handbook has been updated	CA, MoJ	–	31.10.2023
3.5.	To continue monitoring risks of corruption in the healthcare sector.	Information has been updated in the KNAB report on risks of corruption in the healthcare system and recommendations have been provided for mitigation of the risks.	KNAB 2012 report on risks of corruption risks in the healthcare system has been updated	KNAB, MoH		01.07.2024
3.6.	To prevent the risks of corruption and conflict of interest in the implementation of housing policy.	The possibility of risks of corruption in the laws and regulations governing housing policy, as well as in the procedures	Informational report prepared and submitted to the Cabinet of Ministers	MoE	–	31.05.2024

		implemented in practice as been assessed; Proposals to have been prepared on the improvement of the regulatory framework.	Draft laws and regulations have been developed, where necessary			
3.7.	To ensure inter-institutionally equal effectiveness of internal control systems of state and local government institutions and their capital companies	3.7.1. A study by OECD experts on internal anti-corruption control in Latvia, analysing laws and regulations in this area, as well as their application practices (participation in working groups and other information exchange events) has been coordinated and ensured	Results of the study on the assessment of internal anti-corruption control requirements in state and local government institutions and their capital companies have been obtained	KNAB	to be invited as necessary	31.12.2023
		3.7.2. Institutions have been provided with a clear methodology to assess the effectiveness of their internal control systems to prevent corruption and conflicts of interest.	Methodological material available for use	KNAB	–	31.01.2024
		3.7.3. Training has been ensured to prepare representatives of various institutions to apply the methodology developed to assess the quality of internal anti-corruption control systems in their institutions.	Number of events	KNAB	–	31.01.2024

		3.7.4. Based on the conclusions of the study and expressed recommendations, the necessary amendments to laws and regulations have been prepared	Amendments to laws and regulations have been drafted and submitted	KNAB	–	30.09.2024
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4 Line of action		Ensuring the lawfulness of the use of public property and financial resources, including EU funds and other foreign financial aid instruments				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
4.1.	Improvement of conflict of interest checks in public procurements	A technical solution (tool) has been provided for checking the conflict of interest in the EPS (relationship of a preparer of procurement procedure documents, a member of a procurement commission, an expert with a candidate or tenderer within the meaning of laws and regulations governing public procurements) using the information available in the databases of the SRS and the OCMA.	1) The technical assessment of information technology (hereinafter referred to as 'IT') has been performed for the implementation of the conflict of interest checking solution (tool) in the EPS using the information available in the databases of the SRS and the OCMA, and calculation of the necessary funding; 2) Taking into account the technical assessment of IT, the necessary amendments to the relevant laws and	1) SRDA, OCMA, RE, SRS; 2) MoF, SRDA; 3) SRDA, SRS, OCMA, RE	–	1) 30.06.2023 2) 30.06.2024 3) 30.06.2025

			regulations have been drafted; 3) The development of a technical solution (tool) and implementation thereof to the EPS has been performed.			
4.2.	To ensure the transparency and openness of information about all acquisitions and written public construction works, supply and service contracts by institutions of a public person in 'sub-threshold procurements'. (<i>link to the Latvia's Recovery and Resilience Plan 2021-2026, Reform and Investment Axis 6.4 and the Fourth National Open Government Partnership Plan 2020-2021, Commitment 1</i>)	The possibility of ensuring the publishing of information in the EPS (including in open data form) on acquisitions of a public person and written public construction works, supply and service contracts by public person's institutions, as well as the need for amendments to the regulatory framework (including the administrative burden and the usefulness of publications by setting specific thresholds for contract prices) has been assessed.	1) An information report has been prepared and submitted to the Cabinet of Ministers 2) Amendments to the regulatory framework have been drafted, where necessary; 3) Publicly available information has been provided in the EPS in the form of open data, as well as evaluation results to an appropriate extent.	MoF, PMB	SRDA, KNAB	1) 15.03.2024 2) 30.06.2024 3) 31.12.2024
4.3.	To monitor and ensure that only healthcare providers with an internal control system	A random analysis of the internal control system for the prevention of risks of corruption and conflict	Informational report prepared and submitted to the	KNAB, MoH, NHS	—	29.12.2024

	in place for the prevention of risks of corruption and conflict of interest provide state-funded healthcare services according to the amendments to Cabinet Regulation No. 555 of 28 August 2018 “Procedures for the Organisation of and Payment for Health Care Services”, which will enter into force on 1 January 2022 (the requirement to implement an internal control system to prevent the risk of corruption and conflict of interest applies to outpatient medical treatment institutions that provide state-funded healthcare services in at least five types of services).	of interest in healthcare service providers' institutions providing at least five types of state-funded healthcare services.	Cabinet of Ministers			
4.4.	To ensure awareness of private sector representatives about the signs of possible illegal activities in public procurement procedures (corruption	The education of private sector representatives has been implemented, strengthening their ability to identify various possible signs of illegal activities in public	1) 3 educational events, number of participants; 2) educational materials	PMB, CC KNAB	–	29.12.2024

	indicators, possible violations of competition law), while increasing their knowledge and understanding of the current legal framework in procurement procedures, as well as the necessary actions to prevent possible illegal activities in the operations of the contracting authority or other tenderers.	procurement procedures, as well as increasing their knowledge on reporting to the competent authorities.				
4.5.	To ensure an open, transparent and uniform criteria-based procedure for the allocation of public funding to Latvian sports organisations.	An assessment has been prepared for the procedure for granting state funding to Latvian sports organisations, including such aspects as 1) the functioning of the Latvian National Sports Council and its role in granting the funds, 2) the content and detail of the supporting documents of applicants for funding, 3) the criteria for deciding for or against granting the funds. Proposals have been provided on the improvement of funding of Latvian sports organisations.	Informational report prepared and submitted to the Cabinet of Ministers	MoES	KNAB	30.09.2024

5 Line of action		Strengthening integrity and preventing risks of corruption among the judiciary and its related officials				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
5.1.	To promote the ethical awareness, work and behavioural culture of the judiciary staff, to strengthen professional ethics, while enhancing public confidence in the work of the judiciary and improving its public image.	A uniform code of ethics has been developed for judicial staff, clearly defining the basic principles of ethical conduct and the rights and obligations of employees.	A code of ethics has been developed for judicial staff	CA, MoJ	SC	01.04.2023

6 Line of action		Implementation of anti-corruption measures in the private sector				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
6.1.	Raising the entrepreneurs' awareness of corruption and conflicts of interest in the private sector, while providing information on effective measures to prevent them.	Guidelines have been developed for legal entities on managing risks of corruption and establishing an internal anti-corruption system.	Guidelines have been developed	KNAB	–	31.12.2025

6.2.	To strengthen the knowledge of private sector workers about their opportunities, rights and obligations when addressing corruption in everyday situations.	Guidelines have been developed for private sector representatives on the most appropriate course of action if they are asked to act corruptly in the private sector.	Infographics has been developed and published	MoI (SP)		30.12.2023
6.3.	To assess the possibility of improving the regulatory framework and institutional capacity for investigating corruptive criminal offences in the private sector.	The possibility of extending the competence of KNAB with regard to authority to investigate corruptive offences in the private sector has be re-assessed.	Informational report prepared and submitted to the Cabinet of Ministers	KNAB, MoI	–	01.09.2023

Indicators characterising the achievement of Sub-objective 2

To establish and improve an autonomously and continuously operating internal control system that limits to the maximum extent the possibilities of emergence of corruption and defrauding of funds, including the EU and other foreign funds in the state, local government or private sector

No.	Performance indicator	Unit	Base year	Base year value	Target value 2023	Target value 2025	Data source
2.1.	Corruption Perceptions Index is increasing	Points	2020	57	60	65 (NDP2027 – 64 in 2024)	<i>Transparency International</i> ⁴⁹
2.2.	Control of corruption indicator (measures the extent to which the power given to officials is used for personal gain)	%	2020	75.48	79	84	<i>The Worldwide Governance Indicators</i>
2.3.	The number of respondents who rate public administration institutions as very and fairly honest is increasing: 1) State and local government hospitals and clinics, 2) SAO, 3) Associations and foundations (non-governmental organisations), 4) Courts, 5) PMB, 6) Local governments, 7) State and local government undertakings (capital companies) (on a 5-point scale, with -2 being the minimum and +2 the maximum level)	Points	2021	1) 0.4 2) 0.4 3) 0.2 4) -0.2 5) -0.1 6) -0.4 7) -0.2	1) 0.6 2) 0.5 3) 0.4 4) 0.2 5) 0.1 6) -0.3 7) -0.1	1) 0.8 2) 0.6 3) 0.6 4) 0.4 5) 0.3 6) 0.1 7) 0.1	Study ordered by KNAB

⁴⁹ *Transparency International*, Corruption Perceptions Index, see: <https://www.transparency.org/en/cpi/2020/index/lva>
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2.4.	The proportion of Latvian residents using informal payments, gifts or acquaintances for healthcare is decreasing.	%	2021	16%	13%	10%	Study ordered by KNAB
2.5.	The opinion of residents that bribery or bribe-taking and the abuse of power for personal interests are widespread among 1) officials who evaluate public tenders; 2) officials who issue building permits, 3) in courts, 4) in police, customs, 5) in healthcare system is decreasing	%	2022	1) 55 2) 53 3) 29 4) 49 5) 40	1) 50 2) 49 3) 24 4) 42 5) 35	1) 45 2) 45 3) 21 4) 35 5) 30	Special Eurobarometer: Corruption
2.6.	The number of residents who have had to pay an extra amount of money on top of the official payment or give a valuable gift to a nurse or doctor is decreasing	%	2022	6	5	4	Special Eurobarometer: Corruption
2.7.	The share of the entrepreneurs using informal payments, gifts or acquaintances is decreasing 1) when dealing with construction-related matters 2) when participating in public procurements organised by state or local government	%	2022	1) 27% 2) 20%	1) 22% 2) 15%	1) 15% 2) 9%	Study ordered by KNAB

2.8.	The number of respondents who believe that problems related to lower-level corruption have decreased to a small and large extent is increasing	%	2022	31	36	40	Study ordered by KNAB

Sub-objective 3: To reduce public tolerance towards corruption

This sub-objective of the Anti-Corruption Action Plan contains two main lines of action:

- 7 Line of action: Involvement of individuals and groups outside the public sector in prevention of corruption and promotion of public intolerance towards corruption and its threats;
- 8 Line of action: Improvement of protection of whistleblowers and informing of the public about reporting possibilities in cases of detected violations of law.

Within the framework of these lines of action, a number of important measures has been implemented in the past policy planning period 2015-2020, which will provide the basis for promoting public involvement in the fight against corruption in the years to come:

- ✓ CC, PMB and KNAB have organised educational seminars aimed at informing Latvian entrepreneurs about fair business: 1) on aspects of fair competition in public procurement procedures, identification of risks of distortion of competition and possibilities of preventing them; 2) on anti-corruption, prevention of conflict of interest, public administration ethics, internal control and prevention of risks of corruption, including negative consequences of corruption (national and international).
- ✓ The responsible authorities have carried out awareness-raising activities within the financial means available to strengthen residents' confidence in their ability to deal with healthcare institutions, in the area of traffic supervision and the courts without unlawful payments to persons employed in these areas, and to inform them of their obligations and rights.
- ✓ On 27 November 2018, Cabinet Regulation No. 747 "Regulations Regarding the State Basic Education Standard and Model Basic Education Programmes" was adopted (entered into force on 1 September 2020), which provides for the development of social and civic learning skills of students (up to grade 9), such as comparing the moral and legal aspects of human behaviour according to criteria of justice, fairness, responsibility and voluntarism in different cultures and societies. To understand the values of a democratic society as well as state and democratic principles of public administration. To substantiate own opinion on external and internal factors that could threaten or undermine a democratic state, etc.
- ✓ On 3 September 2019, the Cabinet of Ministers adopted Regulation No. 416 "Regulations Regarding the State General Secondary Education Standard and Model General Secondary Education Programmes" (entered into force on 1 September 2020), which, inter alia, aims at raising students' awareness of corruption and enhancing their ability, firstly, to analyse the rule of law, ethics and conflict of interest in different situations, secondly, to analyse the legality and ethics of the actions of public officials and civil society organisations in different situations. To assess legality and illegality, to recognise actually or potentially corrupt situations, and to distinguish corruption from conflict of interest, political influence, lobbying and other closely related yet not identical phenomena. Thirdly, by acquiring the topic at the highest level, a student will be able to analyse specific examples of the use of the concepts of lobbying, corruption, state "capture/theft" and respect for the rule of law in different political environments. To argue the impact of lobbying on the development of society, local governments and the state.
- ✓ As of 2018, KNAB has provided the public with the mobile app "Report to KNAB" as a reporting channel, through which residents can easily and conveniently report both the possible presence of public officials in a conflict of interest situation and

possible cases of corruption, as well as provide information about financing irregularities committed by political organisations (parties) in their opinion.

- ✓ On 11 October 2018, the Saeima adopted the Whistleblowing Law (entered into force on 1 May 2019) with the purpose to promote whistleblowing in the public interest in relation to criminal offences, administrative offences or other violations of legal provisions or binding ethical or professional standards observed on a daily basis and to ensure the establishment and functioning of whistleblowing mechanisms and proper protection of whistleblowers. The law defines who a whistleblower is, how a whistle can be blown, what violations can be the subject of whistleblowing, as well as sets the basic requirements for the examination of a whistleblower's report. The law gives everyone the right to file a whistleblower's report through the mechanisms provided for in the law. The adoption of the Whistleblowing Law is a significant step in the area of protection of whistleblowers, providing for the first time a comprehensive framework for the protection of whistleblowers in Latvia. In order to undertake the requirements of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of the Union law, on 4 February 2022, a new Whistleblowing Law entered into force.
- ✓ Amendments to the PCIL adopted by the Saeima on 21 January 2021 enshrine in the regulatory framework a mandatory obligation for public officials to report to KNAB in all cases when information has come into their possession that *prima facie* indicates that a corruptive criminal offence has been committed.

The continued high tolerance towards corruption among the public, including entrepreneurs, is one of the reasons behind the slowdown of Latvia's anti-corruption policy. Actual statistical data on the actual opinion, experiences and reactions of the society of Latvia related to corruption and its manifestations in Latvia are analysed in more detail in the informational report "On the Final Impact Assessment of the Implementation of the Guidelines for the Corruption Prevention and Combating 2015-2020". However, to summarise briefly, the 2019 Eurobarometer⁵⁰ research shows that only 39% of the residents of Latvia have admitted corruption to be completely unacceptable in business relationships, compared to the EU average indicator of 69%. Furthermore, the survey of the public and entrepreneurs of 2021 conducted by "Latvijas Fakti" showed that the willingness of the residents of Latvia to give a bribe to a public official is high, i.e. 21% of respondents indicated the likelihood of such an action (19% of entrepreneurs), which is almost equal indicator to that of 2015 (22.2%)⁵¹. Moreover, in the last 2 years (2019 and 2020), 21% of the entrepreneurs surveyed have actually made unofficial payments, given gifts or used acquaintances when conducting their business, solving their problems (mainly in relation to construction-related issues). On the positive side, the number of respondents in Latvia who confirmed that they are not ready to report corruption cases at all has decreased. In February 2021, only 14% of the residents were of such an opinion, compared to the indicator of 2015 (32.8%). Targeted public education measures are essential to ensure that members of the public know about a clear and adequate response when they are in a situation where they are being asked for or offered an unlawful advantage, or they have witnessed illegal or unethical behaviour.

In its effort to perform the functions set in the law, KNAB educates various target groups (public officials and the representatives of the private sector) on anti-corruption topics: preventive anti-corruption measures, ethics, aspects of conflict of interest and other subjects. The next planning period provides for broadening of the range of learners. The plan is to raise

⁵⁰ Special Eurobarometer 502, Corruption, Latvia, December 2019, p. 12, see: https://www.stopcorrupt.lu/wp-content/uploads/2020/06/ebs_502_sum_en.pdf

⁵¹ KNAB website, Public opinion poll "Attitudes towards corruption in Latvia", November 2015, p. 67, see: <https://www.knab.gov.lv/lv/media/22/download>
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teachers' awareness of corruption as a social phenomenon, for the knowledge gained to be useful in further training of students. The plan is to raise the topic of corruption in the informative space of school youth by using modern, appropriate methods and approaches to educate school youth about corruption.

At the same time, KNAB constantly informs the public about the necessity and possibilities of reporting on observed irregularities in public institutions within its competence. The call to report and not to be indifferent to the observed illegal activities is being distributed in the KNAB-hosted educational events, press releases, informational leaflets, public events dedicated to specific topics, on the KNAB website, i.e., all the possible channels of information transmission are used. KNAB provides a mobile app "Report to KNAB" as a reporting channel to the public, which has been designed as a convenient tool for every member of the public to inform KNAB in a simple, quick and convenient way about the possible cases of conflict of interest and corruption, violations of rules on financing political parties or pre-election campaigning. The KNAB website also has a separate section "Whistleblower Report", which provides a questionnaire for whistleblowers to provide structured information about observed irregularities in any institution of a public person.

Whistleblowing and the willingness to report corruptive criminal offences, as well as other illegal or unethical activities depends to a large extent on the ability of law enforcement authorities and other public institutions to protect their whistleblowers from the potential negative consequences of reporting. At the same time, the willingness to report to the competent authorities is closely related to the level of public trust in them and, of course, the belief and confidence that the information will be used effectively and the perpetrators will be held accountable. The public opinion poll 2021⁵² showed that 57% of the residents of Latvia are ready to report cases of corruption; moreover, the majority (34%) of these potential whistleblowers would apply directly to KNAB. However, there is still significant work to be done to reduce the perception among citizens that it is not worth reporting cases of corruption. In the 2019 Eurobarometer survey, 48% of respondents said that the reason for not reporting cases of corruption could be the fact that corruption is difficult to prove or, according to 43% of respondents, those involved in corruption will not be punished anyway.

In order to promote public participation in the prevention of corruption by reporting possible criminal offences, administrative offences or other violations of the law or of binding ethical or professional norms, it is important in the coming years to ensure effective protection of the whistleblower's identity also within the framework of administrative and criminal proceedings.

In order to promote the involvement of the broader society in the prevention of corruption, as well as to foster intolerance towards corruption, it is important to ensure continuous monitoring of the relevance / manifestation of corruption in the everyday life of society. Therefore, by 2025, KNAB plans to conduct public opinion polls on: 1) interaction of the residents of Latvia with corruption in various sectors; 2) trust in KNAB, prosecution office and courts; 3) willingness to report corruption to law enforcement authorities; 4) intolerance towards corruption.

Targeted and effective anti-corruption policy planning and implementation requires in-depth research on corruption as a social phenomenon in Latvian society. Therefore, in the coming years, feasibility and planning work should be initiated for the establishment of a national research programme on "Reducing Corruption for Sustainable Development of the State" with the ambitious aim of developing scientifically proven policy recommendations for changes in laws, the organisation of institutional work, the use of smart technologies or other measures to be implemented by the state to reduce corruption that can be implemented by the state, with an assessment of the financial impact of the relevant recommendations.

⁵² Public and business survey "Attitude towards corruption in Latvia", February 2021, page 29, 31, see: <https://www.knab.gov.lv/lv/media/1862/download>
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Measures to be implemented within the framework of Sub-objective 3

7 Line of action		Involvement of individuals and groups outside the public sector in prevention of corruption and promotion of public intolerance towards corruption and its threats				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
7.1.	To ensure continuous monitoring of the relevance / manifestation of corruption in the everyday life of society (interaction with corruption, attitude towards corrupt practices, willingness to report illegal practices and awareness of the protection of one's rights).	An opinion poll has been conducted on: 1) interaction of the residents of Latvia with corruption in various sectors; 2) trust in KNAB, prosecution office and courts; 3) willingness to report corruption to law enforcement authorities; 4) intolerance towards corruption.	A public opinion poll has been conducted	KNAB	–	Once a year [ongoing ⁵³]
7.2.	To raise the topic of corruption in the information space of school youth and to use modern, appropriate methods and approaches to educate school youth about corruption.	7.2.1 The development of an interactive anti-corruption game for students (grades 7-9) has been ensured to be integrated into a competency approach-based education model, as well as methodological material has been ensured for teachers on how to integrate the interactive anti-corruption game into the learning process.	1) An interactive anti-corruption game was developed and made available on the KNAB website; 2) Methodological material was developed	KNAB	–	31.03.2023 [completed ⁵⁴]

⁵³ A public opinion poll was conducted on the attitude of residents and entrepreneurs towards corruption in Latvia in 2021 and a public opinion poll was conducted on the attitude of residents and entrepreneurs towards corruption in Latvia in 2022.

⁵⁴ An interactive anti-corruption game “The Eagle's Challenge” for students in grades 7-9 and a methodological material for teachers has been developed. The game is planned to be posted on the KNAB website, NCE website, online portals soma.lv and uzdevumi.lv.

		7.2.2 Awareness-raising events in the regions on the interactive anti-corruption game and its integration into the learning process.	Five regional awareness-raising events have been ensured	KNAB, NCE	–	31.12.2023
		7.2.3 The development of an interactive anti-corruption game for students (grades 10-12) has been ensured to be integrated into a competency approach-based education model, as well as methodological material has been ensured for teachers on how to integrate the interactive anti-corruption game into the learning process.	1) An interactive anti-corruption game was developed and made available on the KNAB website; 2) Methodological material was developed	KNAB	–	31.12.2023
		7.2.4 Awareness-raising events in the regions on the interactive anti-corruption game and its integration into the learning process.	Regional awareness-raising events have been ensured	KNAB, NCE	–	31.12.2024
7.3.	To expand the knowledge and analytical base by strengthening the link between research and the national action policy in the field of anti-corruption.	Opportunities have been identified for the implementation of a national research programme “Reducing Corruption for Sustainable Development of the State” with the aim of developing scientifically proven policy recommendations for changes in laws, the organisation of institutional work, the use of smart technologies or other measures to be implemented by the state to reduce corruption, with an assessment of the financial impact of the relevant recommendations.	Feasibility and planning work has been commenced for the establishment of a national research programme “Reducing Corruption for Sustainable Development of the State”	KNAB, MoJ	Latvian Council of Science	31.12.2025

7.4.	To take preventive measures to prevent the bribery of foreign officials — to encourage reporting of alleged bribery of foreign officials, informing and raising awareness of Latvian embassy staff on issues related to the bribery of foreign officials	7.4.1 A written instruction has been developed for Latvian embassies and foreign missions on the bribery of foreign officials and the necessary action to prevent it.	An informative material has been developed	KNAB	—	31.12.2023
		7.4.2 Training has been provided to the MoFA staff on diplomats' duty to monitor and report the bribery of foreign officials (including media monitoring).	1) Number of persons trained	KNAB, MoFA	—	Permanently
			2) Summary of information provided by Latvian embassies and missions on the information and advice provided to businesses on the necessary action to be taken in cases of bribery.	MoFA, KNAB		
		7.4.3 Information materials prepared by KNAB are updated on the websites of the MoFA and Latvian embassies.	Information has been updated	MoFA, KNAB	—	Permanently

8 Line of action		Improvement of protection of whistleblowers and informing the public about reporting possibilities in cases of detected offences				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
8.1.	To ensure the achievement of the objective defined in the Whistleblowing Law — to promote whistleblowing on violations in public interests and ensure the establishment and operation of whistleblowing mechanisms, and also due protection of whistleblowers.	8.1.1. An ex-post evaluation of the Whistleblowing Law has been conducted, the effectiveness of existing whistleblowing mechanisms and whistleblower protection has been assessed, and proposals for solutions to improve identity protection within the framework of administrative offence proceedings and criminal proceedings have been provided.	Informational report prepared and submitted to the Cabinet of Ministers	SC	Competent authorities within the meaning of the Whistleblowing Law	31.12.2023
		8.1.2 An assessment of potential granting of financial compensation for the whistleblower, as well as the provision of psychological support has been performed.		SC	—	
8.2.	To promote and implement the KNAB online reporting platform.	8.2.1 Social campaigns have been organised to raise the public awareness of the forms corruption can take and the need to report irregularities	2 social campaigns	KNAB	—	31.12.2023 [ongoing ⁵⁵]

⁵⁵ From 28 October to 9 December 2021, with the financial support of grants from the European Economic Area, KNAB implemented the social campaign “The Iceberg of Corruption”, which aimed at raising the public awareness of the negative consequences of corruption and to reduce the tolerance of residents towards corruption. The campaign consisted of two parts: 1) placing an environmental object “Iceberg of Corruption” in the River Daugava (on 11. novembra krastmala near the Stone Bridge, Riga) and 2) placing promotional materials in the media, on the internet and in the environment with the slogan “Reveal the Invisible Side of Corruption!” (see <https://www.knab.gov.lv/lv/korupcijas-aisbergs>).

		8.2.2 An online reporting platform has been launched for reporting on issues within the competence of KNAB	Functioning reporting platform			31.12.2023
		8.2.3. An informational reminder is maintained to the public in various formats of communication activities (press releases, educational events, public interviews) about possible reporting channels to KNAB.	Increase in the number of reports received by KNAB via the reporting platform	KNAB	–	constantly

Indicators characterising the achievement of Sub-objective 3

To reduce public tolerance towards corruption

No.	Performance indicator	Unit	Base year	Base year value	Target value 2023	Target value 2025	Data source
3.1.	Decrease in the share of the residents who have admitted they are ready to pay a bribe to a public official to solve their problems at state or local government institutions (% of respondents)	%	2022	15	13	10	Study ordered by KNAB
3.2.	Decrease in the number of persons who admitted to having used informal payments or acquaintances in the last 2 years when dealing with matters/issues/problems at state and local government institutions (% of respondents)	%	2022	20	15	10	Study ordered by KNAB
3.3.	Anti-corruption social campaigns (number of campaigns)	Number	2021	1	1	1	KNAB
3.4.	Public trust in KNAB in relation to dealing with situations related to complaints on cases of corruption is growing	%	2019	32	40	45	Special Eurobarometer: Corruption
3.5.	Public willingness to report cases of corruption (openly or anonymously) is increasing	%	2022	61	65	70	Study ordered by KNAB
3.6.	Decrease in the share of residents who do not know	%	2022	18	15	10	Study ordered by KNAB

3.7.	where to apply to report possible cases of corruption							
	Decrease in the share of residents who believe that those who report cases of corruption are not provided with any protection	%	2022	30	25	20	Special Eurobarometer: Corruption	

Sub-objective 4: To ensure inevitability of punishment for offences related to abuse of office and misuse of entrusted power

This sub-objective of the Anti-Corruption Action Plan contains three main lines of action:

9 Line of action: Imposition of effective, proportional and dissuasive administrative or criminal penalties for violations;

10 Line of action: Holding the persons liable for embezzlement, misappropriation or other similar unlawful use of property by a public official;

11 Line of action: Strengthening of effective, knowledge-based actions of law enforcement authorities to fight economic crimes;

At the same time, it should be noted that the Anti-Corruption Action Plan for the new planning period does not maintain the previous lines of action included in the Guidelines related to preventing and combating the bribery of officials of foreign and international organisations, as well as preventing money laundering and promoting the recovery of proceeds from crime, since, as indicated above, in 2020 and in 2022, the CM approved individual action plans to prevent money laundering, terrorism and proliferation financing for the period 2020-2025, which included a broad set of inter-institutional cooperation-oriented tasks in the relevant areas.

However, while highlighting the most important developments in the field of international anti-corruption initiatives, which cannot be separated from the implementation of anti-corruption policy in Latvia in the coming years, Latvia should continue to ensure that its legislation and the practice of its application comply with the OECD Convention. Within the framework of the previous assessments (Phases 1, 2 and 3), the recommendations set by this organisation encourage Latvia to 1) improve the fight against the bribery of foreign officials, including by strengthening the independence of KNAB; 2) strengthen and organise measures aimed at prevention and combating of money laundering; 3) improve the legal framework on such issues as the criminal offence related to the bribery of a foreign official, extradition, liability of legal persons and the obligation of certified auditors to report suspected cases of bribery of foreign officials 4) introduce comprehensive protection for persons reporting offences in both the private sector and the public administration.

The OECD WGB Phase 3 Evaluation Report on Latvia, approved on 10 October 2019, calls on Latvia to step up its fight against cross-border corruption and related crimes: money laundering, financial crimes, including accounting irregularities. The WGB has concluded in Phase 3 Report on Latvia that Latvia has so far continued to improve the legal framework criminalising the bribery of foreign public officials and money laundering related thereto. At the same time, international experts stress the need to ensure effective application of these legal provisions. In order to achieve better results in the fight against the bribery of foreign officials and money laundering related thereto, the WGB recommends that Latvia take a number of measures, including:

- ✓ to ensure that the relevant authorities have sufficient resources and expertise to effectively investigate cases and prosecute persons for the bribery of foreign officials and money laundering related thereto;
- ✓ to improve the prosecution outcomes with regard to companies, in particular Latvian financial institutions and other legal persons, involved in bribery schemes of foreign officials and money laundering related thereto;
- ✓ to improve cooperation between KNAB, SP and public prosecutors and introduce a strategic approach to investigating the bribery of foreign officials and money laundering related thereto;
- ✓ to strengthen the capacity to detect the bribery of foreign officials;
- ✓ to ensure effective functioning of the FCMC, thereby contributing to the prevention and detection of bribery of foreign officials and money laundering related thereto

in banks as well as financial and capital market supervisory authorities.

In total, the WGB has provided 44 recommendations to Latvia, providing for practical measures aimed at more effective detection, investigation of bribery of foreign officials and money laundering related thereto, and holding the perpetrators liable, imposing effective, proportionate and dissuasive penalties. On 28 April 2020, the CM adopted the information report prepared by the MoJ “On Phase 3 Report on Latvia by the OECD Working Group on Bribery in International Business Transactions, its Recommendations and Ensuring Their Implementation” (Minutes No. 28, 33§) and, respectively, “Plan of Measures and Tasks for the Implementation of the Recommendations of Phase 3 Report on Latvia by the OECD Working Group on Combating Bribery in International Business Transactions”⁵⁶. The tasks set out in the Action Plan approved by the Government are implemented by the MoJ, MoF, MoFA, KNAB, SP, PGO, the courts, FCMC, FIU, SRS, SC, Altum and other institutions. By working together on the tasks of the joint work plan, the responsible institutions plan to strengthen Latvia's capacity to detect and investigate cross-border corruption and related crimes (money laundering, financial crimes, including accounting-related offences), as well as strengthen the rule of law, promote economic growth, ensure a transparent decision-making process and a stable legal environment. Based on the aforementioned, the Anti-Corruption Action Plan does not include additional tasks to combat the bribery of foreign officials.

At its plenary meeting in October 2021, the OECD WGB examined the Latvia's progress report on the implementation of the Phase 3 recommendations. In the Phase 3 Report⁵⁷ on compliance with the implementation of recommendations set for Latvia in 2019, it was concluded that Latvia had fully or partially implemented 35 of the 44 OECD WGB recommendations in 2021. The OECD WGB has admitted Latvia's significant progress in implementing the recommendations of the Phase 3 recommendations, achieving and demonstrating obvious results in successful investigation and further progress of criminal cases regarding the bribery of foreign public officials. Latvia will continue its work on the implementation of the OECD Convention and on improving various processes based on the shortcomings identified in previous evaluation reports. Accordingly, Phase 4 of the evaluation of Latvia will take place in 2024.

Latvia has also received increased attention in relation to the recommendations arising from the Fifth Round Mutual Evaluation Report of the EC and the Council of Europe Moneyval Committee on Latvia's system for anti-money laundering and counter-terrorist financing measures, which clearly outlines problems in the handling of money laundering cases. The *Freedom House Nations in Transit 2020* report also downgrades Latvia's score on corruption, the regulatory framework and judicial independence, pointing at the need for urgent and immediate solutions to money laundering and foreign bribery cases.

On 31 March 2021, the Economic Affairs Court began working. The main objective of the establishment of the said specialised court was to ensure high-quality and speedy handling of complex commercial disputes, economic and financial crimes, as well as corruption cases, ensuring efficient and rational use of state budget funds. The Economic Affairs Court has jurisdiction over specific commercial disputes and criminal cases involving especially serious and serious crimes that cause significant damage to the business environment and the development of the national economy. The criminal legal competence of this body covers handling the following cases:

- 1) money laundering and financing of terrorism and proliferation;

⁵⁶ CM website, Draft Laws, Information Report “On the Phase 3 Report on Latvia by the OECD Working Group on Bribery in International Business Transactions its Recommendations and Ensuring Their Implementation”, see: <http://tap.mk.gov.lv/mk/tap/?pid=40485584>

⁵⁷ The OECD WGB *Phase 3 two-year follow-up report: Latvia*, see: <https://www.oecd.org/corruption/Latvia-phase-3-follow-up-report-en.pdf>
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2) corruptive criminal offences, as well as criminal offences related to the acceptance of an unauthorised benefit, unauthorised participation in property transactions and giving, requesting or accepting an unlawful benefit, committed by a public official or an official holding a responsible position or an employee of a state and local government institution who is not a public official, or if the bribe or unlawful benefit has been accepted after it was extorted or requested.

Whereas, the Coordination Division for Combating Money Laundering of the Prosecutor General's Office will have to ensure that coordination functions are performed in criminal proceedings classified according to Section 195 of the CL and in proceedings regarding criminally acquired property (Chapter 59 of the CPL), but the relevant structural units of the Public Prosecutor's Office will have to provide priority, timely and active supervision of the investigation and prosecution in these criminal proceedings.

The sub-objective “To ensure inevitability of punishment for offences related to abuse of office and misuse of entrusted power”, already set out in the Guidelines, can be attributed to certain progress in various areas over the past six years, within the framework of the implementation of various planned measures, namely:

- ✓ On 1 July 2016, Latvia became a full-fledged member state of the OECD. Up to that moment and in further years, Latvia has carried out a comprehensive assessment of country risks (including financial risks), implemented appropriate risk management, and envisaged specific actions to address the identified risks. During the period of the Guidelines, the MoJ, in cooperation with other responsible authorities, has ensured the assessment of Latvia's compliance with Phases 2 and 3 of the OECD Convention. The MoJ has prepared an information report “On the Evaluation of the Implementation of the Recommendations of Phase 2 Report on Latvia by the OECD Working Group on Bribery in International Business Transactions” (examined at the CM on 27 March 2018), as well as an information report “On Phase 3 Report on Latvia by the OECD Working Group on Bribery in International Business Transactions, its Recommendations and Ensuring Their Implementation” (examined at the CM on 28 April 2020).
- ✓ Statistical data is continuously recorded in accordance with the OECD WGB statistical content, accounting the information on criminal proceedings terminated due to statute of limitations. KNAB continuously compiles detailed statistics related to criminal proceedings investigated by KNAB and its international criminal legal cooperation. Since 2014, the responsible structural unit of the Prosecutor General's Office has also been responsible for entering detailed statistical data into the Information System on Requests for International Criminal Legal Cooperation, which is a database specially created with the EU financial support for centralised and detailed recording of requests for international cooperation in the field of criminal law.
- ✓ Operational since 2017 is the NCIM⁵⁸, which is the main nationwide platform for long-term cooperation and coordination of the competent national law enforcement and security authorities (SP, SBG, SSS, SRS Tax and Customs Police Department, KNAB, MP, LPA, PGO, FIU, ISB) in preventing and combating crime, based on joint criminal intelligence, the results of which are essential for decision-making at strategic, tactical and operational level on the necessary actions to prevent and combat crime, as well as for defining objective priorities for preventing and combating crime.
- ✓ The Permanent Work Group on the Criminal Procedure Law under the MoJ has drafted a regulation with regard to means of security for legal entities, which was adopted by

⁵⁸ The NCIM was established within the framework of the project HOME/2011/ISEC/AG/4000002542 “Establishment of the National Criminal Intelligence Model”, jointly implemented by the MoI and the SP during the period from 2012 to 2014, with the aim of establishing a uniform criminal intelligence system in the national law enforcement and security authorities.

the Saeima on 6 October 2022 with Amendments to the Criminal Procedure Law. Their aim is to improve the criminal procedural framework for the procedure regarding imposing coercive measures on a legal entity by determining a new type of procedural sanctions — security measures for a legal entity. Three types of security measures have been defined, as well as the possibility of imposing coercive fines on legal entities in cases of non-compliance with the security measures imposed.

- ✓ Targeted work has been performed to ensure that the staff of control institutions receive the training they need to perform their duties in preventing and combating corruption and reducing the shadow economy.
- ✓ By strengthening the capacity of the country's anti-corruption policy in the area of taxation and border control, specialised training on cross-border cooperation between law enforcement authorities (in the area of reduction of the shadow economy and corruption) and the legal framework was provided to the staff of the national tax administration and tax audit authorities, as well as law enforcement authorities, on approaches to preventing and combating money laundering, on preventing money laundering and the financing of terrorism and proliferation, on the legal aspects of conducting operational experiments in the context of joint cooperation between several countries, on preventive tools to combat fraud and on the implementation of the national strategy.

In the coming years, public trust and confidence in the Latvian law enforcement system as a whole, in its ability to determine and apply appropriate administrative or criminal penalties for violations and criminal offences, furthermore, within a reasonable timeframe, should be strengthened. It is noteworthy that in the public opinion poll,⁵⁹ respondents refer to the fear of being caught and punished as an important barrier that might prevent them from giving a bribe to a state or local government official. In 2021, 31% of respondents held this view. This reinforces the confidence that reduction of corruption nationwide should be promoted, first, by addressing the shortcomings in the legal framework identified in practice and, second, by promoting a common practice and understanding in its application by pre-trial investigation institutions, prosecution office and courts. Seeing cooperation and efficiency of these institutions characterised by the case handling time and imposition of fair punishment could possibly reduce the proportion of the residents that is not ready to report corruption at all (14% in 2021⁶⁰)

When raising the public awareness of the inevitability of punishment and at the same time deterring public officials from possible involvement in unlawful activities, KNAB, within the scope of its competence, regularly publishes information regarding criminal proceedings initiated by the institution, significant developments in the progress of criminal cases, as well as punishments imposed on public officials for criminal offences in the service of public institutions. In the coming years, the Anti-Corruption Action Plan provides for the said task for all the investigative institutions. However, each institution will be able to adapt the form of distribution to its internal communication plan and strategy.

Within the framework of the project “Support for the Establishment of a Whistleblowing System in Latvia”, co-financed by the Programme “International Police Cooperation and Combating Crime” of the European Economic Area grant, KNAB plans to implement three important activities by 31 December 2022: the establishment of an online reporting platform for reporting on issues of KNAB competence, the organisation of two social campaigns to raise the public awareness of the manifestations of corruption and the need to report observed

⁵⁹ Public and business survey “Attitude towards corruption in Latvia”, February 2021, page 28, see.: <https://www.knab.gov.lv/lv/media/1862/download>

⁶⁰ Public and business survey “Attitude towards corruption in Latvia”, February 2021, page 29, see.: <https://www.knab.gov.lv/lv/media/1862/download>
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violations, as well as to implement measures to strengthen the investigative and analytical capacity of KNAB.

In order to promote institutional cooperation among all law enforcement authorities responsible for identification and investigation of corruptive criminal offences, as well as to increase the knowledge of law enforcement officers in preventing and combating corruption and to facilitate the exchange of information and experience among these authorities, KNAB is planning training sessions involving analysts, investigators and operational staff of the SRS, ISB, SP and FIU within the framework of the above-mentioned project. The joint training of these institutions will not only facilitate cooperation between them, but will also ensure the transfer of best practices, which will improve Latvia's overall capacity to detect and investigate corruption offences, including the ability to professionally process information provided by whistleblowers, so that analytical and investigative activities lead to a fair criminal legal regulation.

Inter-institutional training and experience sharing activities are also planned in priority areas (use, withdrawal and storage/management of cryptocurrency; digital evidence; OSINT (*open source intelligence*); fraud and other criminal offences related to EU funds/foreign financial aid; anti-money laundering).

Criminal procedural immunity of judicial officials and Members of the Saeima is still topical, debatable and subject to review, restricting it to the stage of criminal prosecution, allowing law enforcement authorities to conduct investigative actions that would protect evidence related to the alleged unlawful conduct of these public officials. It should be noted that political will is essential in these matters, but decision-making is a political choice. The Anti-Corruption Action Plan retains the task from the previous policy planning period to assess and draft a regulatory enactment to ensure that, prior to the lifting of criminal procedural immunity, investigative actions are allowed to protect evidence related to the alleged unlawful conduct of Members of the Saeima and that criminal procedural immunity is limited to the stage of prosecution only.

Measures to be implemented within the framework of Sub-objective 4

9 Line of action		Imposition of effective, proportionate and dissuasive administrative or criminal penalties for violations				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
9.1.	To maintain constant public awareness of the penalties imposed on public officials for criminal offences committed in the service of public institutions, as well as the content of the offence committed, creating public awareness of the inevitability of penalties and at the same time deterring public officials from possible involvement in illegal activities.	Public information measures on sanctioned public officials are implemented through continuous monitoring of the progress of criminal proceedings referred for prosecution and the judgements that have entered into effect.	Information has been published on the websites of the investigating authorities	All investigating authorities	–	Permanently
9.2.	To ensure that immunity from criminal proceedings is limited to the stage of prosecution only.	An assessment of the current situation has been performed and, if necessary, proposals for amendments to the regulatory framework have been made to ensure that, prior to the lifting of immunity, investigative actions that would protect evidence related to the alleged unlawful conduct of Members of the Saeima are permitted and that criminal procedural	The assessment has been submitted to the Cabinet of Ministers or the Saeima	MoJ	PGO, KNAB, SP, SRS, SSS	31.12.2025

		immunity is extended only to the stage of prosecution only.				
9.3.	To ascertain the possible relationship between a person's gender and their willingness to engage in corrupt practices in Latvia, based on international experience and the methodology of previous international studies.	An analysis of the role of gender and its possible impact on manifestations of corrupt behaviour has been performed	Evaluation and infogram has been prepared	KNAB, ISB, SRS, SBG	MoW	29.12.2023

10 Line of action		Holding the persons liable for embezzlement, misappropriation or other similar unlawful use of property by a public official				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
10.1.	To prevent the abuse of administrative resources of state and local government institutions (especially in the pre-election period and between elections) and to create the conditions to prove such violations and to apply the liability provided for in the regulatory framework.	Assessment of the practice of application of the Law On Prevention of Squandering of the Financial Resources and Property of a Public Person has been performed identifying the main problems and necessary improvements (previously detected violations, their detection and imposed penalties)	An information report has been prepared and submitted to the Cabinet of Ministers; Amendments to laws and regulations have been drafted, where necessary	KNAB, MoI	MoF, SAO	01.06.2024

11 Line of action		Strengthening of effective, knowledge-based actions of law enforcement authorities to fight economic crimes				
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
11.1.	To promote and ensure the investigation and prosecution of corruption-related offences. (e.g., tax evasion, ML, accounting irregularities) (Link to <i>The Action and Task Plan for the Implementation of the Phase 3 Recommendations by the OECD Working Group on Bribery in International Business Transactions</i>)	Inter-institutional training and experience sharing activities have been ensured in priority areas (taxation, use, withdrawal and storage/management of cryptocurrency; digital evidence; OSINT (<i>open source intelligence</i>); fraud and other criminal offences related to EU funds/foreign financial aid; anti-money laundering, etc.)	Number of training events, number of staff trained	Judicial Training Centre, LEAs, PGO, courts, LSPA	–	30.12.2023
11.2.	To promote the prevention and investigation of corruption and related crimes in the public and local government sector, in particular through the use of public-private partnerships, i.e., by actively using the Cooperation Coordination Group established in Section 55 of the Law on the Prevention of Money Laundering and the	The role of public-private partnership (Cooperation Coordination Group meetings) in the prevention and investigation of corruption and related crimes in the public and local government sectors has been purposefully	Number of meetings of the Cooperation Coordination Groups with the participation of KNAB	KNAB, FIU	–	constantly [ongoing ⁶¹]

⁶¹ Through the performance of tactical analysis, KNAB has proposed to the FIU to convene 10 Liaison Coordination Group meetings in 2021 and 26 such meetings in 2022. By involving credit institutions in the process of tactical analysis, officials whose actions are indicative of a criminal offence have been identified. The public-private partnership resulted in the initiation of three criminal proceedings and two departmental inquiries in 2021 regarding false declarations by public officials, whereas, in 2022, two criminal proceedings were initiated regarding alleged corrupt practices, and several operational accounting cases.

	Financing of Terrorism and Proliferation to achieve operational objectives (link to the Plan of Measures for Strengthening the Proportionate Approach Complying with the Requirements on the Prevention of Money Laundering and the Terrorism and Proliferation Financing, Action 18)	promoted and developed.				
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Indicators characterising the achievement of Sub-objective 4

To ensure inevitability of punishment for offences related to abuse of office and misuse of entrusted power

No.	Performance indicator	Unit	Base year	Base year value	Target value 2023	Target value 2025	Data source
4.1.	Rule of law indicator (measures individuals' belief in the prevalence of the rule of law and their propensity to conform to societal norms and laws, including in relation to the functioning of law enforcement authorities and operations of the courts)	%	2020	81.25	84.00	89.00	<i>The Worldwide Governance Indicators</i>
4.2.	The number of respondents answering “I am not ready to report corruption at all” in the affirmative in sociological surveys is decreasing	%	2022	16	14	10	Study ordered by KNAB
4.3.	The number of respondents who admit in sociological surveys that they consider prosecution as an important barrier that could prevent them from giving bribes to public officials	%	2022	33	35	39	Study ordered by KNAB
4.4.	The case handling time for the trials of criminal cases regarding criminal offences in the service of public authorities before a court of	%	2020	89.70%	88%	90%	CA (data recorded in JIS)

4.5.	first instance does not exceed 24 months An effective mechanism is in place to impose proportionate and dissuasive criminal penalties for corruptive criminal offences committed in the private sector (number of persons in relation to which prosecution is sought)	Number	2020	3	10	10	MoI IC Criminal Procedure Information System
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Sub-objective 5: To limit the power of money in politics

This sub-objective of the Anti-Corruption Action Plan contains two main lines of action:

12 Line of action: Ensuring transparency in the financing of political organisations and reducing the role of money in politics;

13 Line of action: Promotion of public participation in the policy-making process.

Funding plays an important role in the existence and functioning of a political organisation (party). It is a tool that allows a political organisation (party) to build and maintain its communication, recognisability and image in society, as well as to attract a certain electorate during the pre-election period. In order to limit the power of money in politics, or the transfer of private investors' interests onto the country's political agenda, the anti-corruption policy over the past six years has focused on reducing the amount of private donations/gifts (donations) raised, compensating for this with public budget funding. According to statistics, this approach has had an effect: by increasing the share of state budget funding for political organisations (parties), the share of private funding has decreased (see Figure 1).

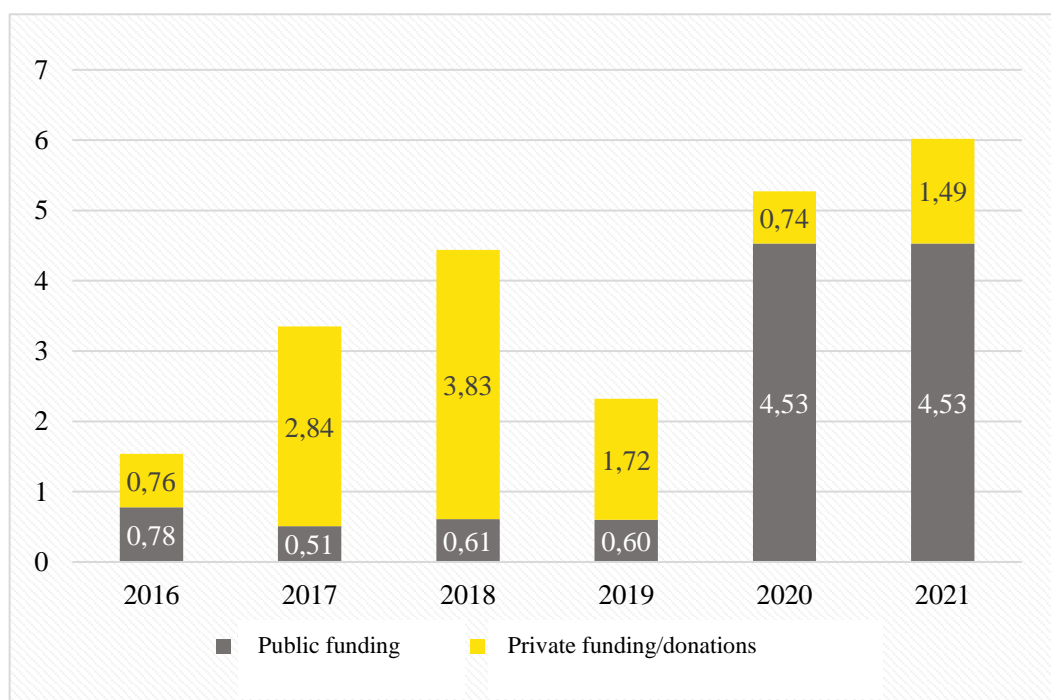


Figure 1. Ratio of state budget funding to private funding for political organisations (parties) in 2016- 2021 (million EUR).

Political parties in Latvia are currently experiencing a crisis of trust. In 2020/ 2021, the Eurobarometer survey ordered by the EC showed that only 7% of residents in Latvia trusted in political parties (6% in 2019), which is a very low indicator compared to the EU average (27%)⁶². In the Eurobarometer survey conducted in 2019, when respondents were asked about different areas where they thought bribe-giving and bribe-taking, as well as the abuse of power for personal gain were common, 46% of respondents specifically indicated at political organisations (political parties), while fewer (38%) respondents linked these illegal activities to politicians at a national, regional and local level. The high level of distrust is most directly

⁶² EU website, Standard Eurobarometer 94, National Report “Public Opinion in the European Union” (2020-2021), see: <https://europa.eu/eurobarometer/surveys/detail/2355>

reflected in the low turnout of voters: On 6 October 2018, 844,925 or 54.6% of eligible citizens participated in the elections of the 13th Saeima⁶³; on 25 May 2019, 474,390 or 33.5% of eligible citizens participated in the regular EP elections; on 29 August 2020, 171,507 or 40.58% of eligible citizens participated in the Riga City Council elections, whereas, on 5 June 2021, 327,950 voters participated in the local government elections, representing 34.01% of all the eligible voters.

Openness in the activities of political organisations (parties), transparency in the origin and flow of funding, and monitoring of the legality of spending are some of the steps towards building public trust in political organisations. However, the practical functioning and results of political organisations (parties) after they have been given legislative powers by citizens in elections are equally important.

Information report “On the Final Impact Assessment of the Implementation of the Guidelines on Corruption Prevention and Combating 2015-2020” provides a broader insight into the current developments in the Latvian political environment, as well as the measures taken to promote transparency and legality in the financial activities of political organisations (parties).

However, the following should be highlighted as the key steps in the area of party financing control in the past six years:

- ✓ The Law on Financing of Political Organisations (Parties) has been amended⁶⁴, setting a threshold of 30% of a person's income that they can donate to one political organisation (party) in one calendar year.
- ✓ EDIS (Electronic Data Input System) has been developed to enable automatic data entry for political organisations (parties). It is designed to make electronic and simplify the submission of documents and reports by political parties, which will help to use the information submitted by political parties on their financial activities in different views, facilitate the processing and publication of this information, and speed up the process of KNAB inspections. EDIS will also reduce the administrative burden for reporting, and parties will be able to receive information on non-compliance of donations with the requirements of laws and regulations more quickly.
- ✓ On 10 September 2019, the CM adopted Regulation No. 417 “Regulations Regarding the Submission and Publishing of the Information of Political Organisations (Parties) Regarding Joining Fees, Membership Fees, Gifts (Donations), Declarations of Income and Expenses of Elections, and Annual Reports” (entered into force on 14 September 2019). They lay down the procedure by which a political organisation (party) informs KNAB via EDIS about the joining fees, membership fees and gifts (donations) received and returned and submits the declaration of election revenues and expenditures and the annual report.
- ✓ According to the amendments of 14 November 2019 to Section 7¹ of the Law on Financing of Political Organisations (Parties) (entered into force on 1 January 2020), the state budget financing of political parties has been substantially increased, determining the amount of state budget financing to be disbursed and the procedure for disbursement. The aim of such a funding model is 1) to reduce the financial dependence of political parties on donations from private individuals, which increases the risk of becoming dependent on their demands; 2) to solve the administrative failure of Latvian political parties — a constant need for resources that has prevented Latvian political parties from covering their administrative costs and becoming more professional.

⁶³ On 4 October 2014, elections of the 12th Saeima took place in Latvia, and the participation rate among the eligible citizens was 58.85%.

⁶⁴ Amendments to the Law on Financing of Political Organisations (Parties), see: <https://likumi.lv/ta/id/294878-grozijumi-politisko-organizaciju-partiju-finansesanas-likuma>
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- ✓ On 14 January 2020, the CM adopted Regulation No. 24 “Regulations Regarding Spending of the State Budget Financing Granted to Political Organisations (Parties)”. They define, inter alia, the types of target groups, eligible expenditure and limits on the use of the allocated state budget funding. Parties are also obliged to use the state funding they receive efficiently, i.e., to achieve their objectives by using as little money as possible and by acquiring the property or services they own or use at the best possible price.
- ✓ The legal framework on the liability mechanism of a political organisation (party) for the suspension or interruption of state budget funding has been improved.

A major development in the new policy planning period is the strengthening of transparency of interest representation and lobbying in the regulatory framework. On 13 October 2022, the Saeima adopted the Law on Transparency of Interest Representation, which will enter into force on 1 January 2023. Concurrently, work will be continued on the development of the Register of Interest Representation and the Interest Representation Declaration System. The requirement to provide this register and system will enter into force on 1 September 2025.

During the new policy planning period, within the framework of the LSPA European Social Fund project No. 3.4.2.0/15/I/002 “Professional Development of Public Administration Human Resources in the Field of Prevention of Corruption and Reduction of the Shadow Economy”, it is planned to provide training and experience sharing events for employees of state institutions and local governments on current issues related to lobbying and ensuring its openness until 31 December 2023.

In the new planning period, in order to promote transparency in the financing of political organisations (parties) and reduce the role of money in politics, the KNAB's agenda plans the following:

- to continue to educate campaigners, advertising service providers and political organisations (parties) about the current limits on pre-election campaigns;
- to continue to develop and update methodological materials on issues of interest to parties and other electoral stakeholders during the pre-election period and on election days to ensure the correct interpretation and application of the legislation binding on them in the run-up to the elections;
- to review and align the maximum amount of the penalty provided for in the laws and regulations for a detected violation of the pre-election campaigning procedure or non-compliance with the restrictions set for pre-election campaigning on the internet, in public places, in electronic media, in press publications;
- to assess the transparency of the use of state budget funding for political organisations (political parties) (including the amount of information to be submitted and published by political parties);
- to review the items of limited expenditure for election campaigns by political organisations (parties) and their associations;
- to assess the current model of state budget funding for political organisations (parties) and prepare proposals for its improvement, including the possibility of granting state budget funding also to regional political organisations (parties);
- to assess the procedure for removing a political organisation (party) from the Register of P

In order to ensure and facilitate public participation in the policy-making process, KNAB will improve the publication of reports submitted by political organisations (parties) in an open data format, so that data retrieval meets the requirements of modern society.

Measures to be implemented within the framework of Sub-objective 5

12 Line of action Ensuring transparency in the financing of political organisations and reducing the role of money in politics						
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
12.1.	To plan and ensure the most automated possible processing of SRS and KNAB data for the control of compliance with the rules on financing of political organisations (parties) and their associations.	12.1.1. Assessment has been performed with regard to legal and technical possibilities of ensuring automatic processing (exchange) of data held by the SRS (income of natural persons) and data held by KNAB (donations, gifts to political parties, joining and party membership fees) for the purpose of controlling compliance with the rules on financing political organisations (parties) and their associations, including also such aspects as the legal basis and economic justification for processing personal data: 1) In line with the previous assessment, a follow-up action plan for the exchange of the SRS and EDIS data has been developed; 2) Amendments to the regulatory framework have been prepared with relation to data exchange as necessary.	An information report has been prepared (evaluation of the SRS information system and EDIS data exchange)	KNAB, SRS	—	31.12.2024
		12.1.2. An assessment of the transparency of the use of state budget funding for political parties	Informational report prepared and submitted to the	KNAB	—	31.12.2023

		has been prepared (including the amount of information to be submitted electronically by political parties and made public)	Cabinet of Ministers			
		12.1.3. The current model of state budget funding for political organisations (parties) has been assessed and proposals have been provided for its improvement, including the possibility of granting state budget funding also to regional political organisations (parties).	Informational report prepared and submitted to the Cabinet of Ministers	KNAB	MoJ	31.12.2023
		12.1.4. The legal framework for the application of liability in criminal and administrative proceedings for illegal financing of parties has been revised: 1) previously established or suspected cases of illegal financing of parties and problems in the application of criminal and administrative liability have been analysed (the role of party members and election candidates in raising illegal money, as well as the applicability of penalties and liability to them); 2) the system of criminal penalties in relation to party 'black coffers' has been assessed, including analysing the possibility of	An assessment has been prepared and submitted to the Permanent Working Group on The Criminal Law under the Ministry of Justice for discussion and, if necessary, proposals for amendments to the laws and regulations have been prepared.	KNAB	MoJ, PGO	01.06.2024

		imposing criminal liability for intermediation in the illegal financing of a political organisation (party) or an association of political organisations (parties) in an amount lower than the 'large amount' currently defined in the CL, or at least fifty minimum monthly salaries in the Republic of Latvia at a given time).				
12.2.	To ensure controlled compliance with the restrictions on pre-election campaigning, campaigning before referendum, campaigning to propose a law and campaigning to recall the Saeima, as laid down in the laws and regulations.	12.2.1. In order to prevent the uncontrolled use of funds by political organisations (parties) and their associations within the framework of election campaigns, the items of limited expenditure for election campaigns of political organisations (parties) and their associations have been clarified by setting a limit for the expenditure set out in Section 8 ² , Paragraph Two, Clause 3 of the Law on Financing of Political Organisations (Parties) for the preparation of all types of advertising materials (video, audio materials, posters, etc.) for further distribution/placement in public space.	Amendments to the laws and regulations governing the financial activities of political parties have been drafted and submitted to the Cabinet of Ministers	KNAB	–	31.12.2023
		12.2.2. The maximum amount of the fine provided for in the laws and regulations for a detected violation of the pre-election campaigning	Amendments to the Pre-election Campaign Law have been drafted	KNAB	NEPLP	31.12.2023

		procedure or non-compliance with the limits set for pre-election campaigning on the internet, in public places, in electronic media and in press publications has been revised and harmonised.	and submitted to the Cabinet of Ministers.			
		12.2.3. To educate campaigners, advertising service providers and political parties about limits on pre-election campaigns	Educational seminars have been organised	KNAB	NEPLP, DSI	constantly before elections [ongoing ⁶⁵]
		12.2.4. Based on a preliminary analysis of issues of interest of political parties and other electoral stakeholders during the pre-election period and on election days, a methodological material for political parties was updated to ensure the correct interpretation and application of the laws binding on them (including on pre-election campaigning on the internet) in the run-up to the elections	A methodological material for political parties has been updated and made public	KNAB	—	constantly before elections [ongoing ⁶⁶]

⁶⁵ In 2021 and 2022, KNAB organised online webinars for advertising service providers, regional press and campaigners on the limits set for the pre-election campaigning period. In 2022, KNAB officials organised or participated in six educational events related to pre-election campaigning.

⁶⁶ In 2021 and 2022, KNAB has prepared and published a set of information materials on pre-election campaigning on the institution's website (see: <https://www.knab.gov.lv/lv/informativie-materiali-par-prieksvelesanu-agitaciju>).

		12.2.5. A methodological material has been developed for representatives of the electronic media on the correct interpretation and application of the legislation binding on them in the context of pre-election campaigning.	A methodological material for electronic media has been developed and made publicly available	NEPLP	–	constantly before elections [ongoing ⁶⁷]
12.3.	To ensure a clear legal framework for the life cycle of political organisations (parties) and find the necessary solutions to monitor the legitimacy of party activities	12.3.1. The procedure for removing a political organisation (party) from the Register of Parties has been assessed to prevent a party from being in a liquidation status for a prolonged period.	An information report has been prepared and submitted to the Cabinet of Ministers; Amendments to laws and regulations have been drafted, where necessary	MoJ, RE, KNAB		01.06.2024
		12.3.2. Assessment of the legal framework for the organisation of elections has been performed, including an assessment of the responsibility of parties in terms of membership and the implementation of political programmes.	An information report has been prepared and submitted to the Cabinet of Ministers; Amendments to laws and regulations have	MoJ, CEC		31.12.2024

⁶⁷ In 2021, NEPLP has developed guidelines for the activities of radio and television during the pre-election campaign period (see: <https://www.neplp.lv/lv/vadlinijas-elektronisko-plassazinas-lidzeklu-darbibai-prieksvelesanu-agitacijas-perioda-laika>)

		12.3.3. Proposals have been identified and provided to ensure that political parties have the necessary number of party members to ensure the legitimacy of the party's activities, including the decisions taken.	been drafted, where necessary Informational report prepared and submitted to the Cabinet of Ministers	MoJ (RE)		31.12.2024
12.4.	To ensure accurate records of the membership of political parties, as well as up-to-date information on parties that are part of political party associations	Assessment of the situation has been performed, and proposals have been prepared for the necessary amendments to the Law on Political Parties to ensure accurate and structured accounting of the membership of political parties, as well as of parties belonging to political party associations, while identifying the possibilities of making the data public.	Amendments to the Law on Political Parties have been drafted	MoJ (RE)	–	31.12.2024

13 Line of action Promotion of public participation in the policy-making process						
No.	Action	Outcome	Performance indicator	Responsible authority	Co-responsible authorities	Deadline
13.1.	In order to develop a methodology for the implementation of assessment of national	An idea and thought exchange event (hackathon) has been organised	1) An idea and thought exchange event has been organised;	KNAB	–	1) 31.03.2023 1) 31.03.2023 [completed ⁶⁸]

⁶⁸ On 12 and 13 November 2021, an online event “Anti-Corruption Data Hackathon” organised by KNAB, LSPA and the Transparency International Latvia/Delna took place.
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	risks of corruption, within the framework of which data of various content are to be analysed, a new model of public cooperation for the exchange of ideas and thoughts between experts in different fields is to be established, finding practical solutions to improve and strengthen the analytical work of KNAB.		2) Proposals have been summarised for the development of methodology for the assessment of national risks of corruption.			
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It brought together 70 participants from various public administration and local government authorities and the private sector, including data scientists and analysts, programmers and auditors. Two teams won the Anti-Corruption Data Hackathon. One team developed and proposed a monitoring tool for procurement actors and transactions that could identify potentially corrupt transactions. Whereas, the other team proposed to create an index assessing the level of tolerance to corruption among employees of state and local government institutions, revealing the extent to which institutions have implemented anti-corruption measures. All the ideas of the teams have been compiled and, where possible, used in the strategic studies and will be used in the development of the national corruption risk assessment methodology with OECD experts.

Indicators characterising the achievement of Sub-objective 5

To limit the power of money in politics

No.	Performance indicator	Unit	Base year	Base year value	Target value 2023	Target value 2025	Data source
5.1.	The number of respondents who rate the Saeima as very and fairly honest when it comes to corruption (on a 5-point scale, with -2 being the minimum and +2 the maximum) is increasing	Points	2022	-0.6	-0.4	0.1	<i>Study ordered by KNAB</i>
5.2.	Public trust in the Cabinet of Ministers is increasing (the share of respondents who trust and rather trust the work of the government)	%	2022	19	21	25	<i>Standard Eurobarometer</i>
5.3.	Public trust in the Saeima is increasing (the share of respondents who trust and rather trust the Saeima)	%	2022	19	21	25	<i>Standard Eurobarometer</i>
5.4.	Public trust in political parties is increasing (the share of respondents who trust and rather trust political parties)	%	2021	7	9	11	<i>Standard Eurobarometer</i>

IV. Territorial Perspective

The implementation of the Anti-Corruption Action Plan has no impact on the territorial perspective.

V. Assessment of Impact on the State and Local Government Budgets

The measures included in the Plan are to be implemented within the framework of the funds allocated to the institutions within the national budget for the current year.

Within the framework of line of action 2, for the study to be carried out in 2024 on the practice of applying codes of ethics of public institutions, the State Chancellery needs additional state budget funding in the indicative amount of EUR 30,000. The indicative costs of the planned study are based on previous experience with similar studies. Likewise, when determining the indicative costs of the study, the possible increase in the costs of the study in 2024 has been taken into account.

Within the framework of the line of action 9, a study should be carried out in 2025 to identify the current legal situation and possible solutions to ensure that, prior to the lifting of immunity, investigative actions are allowed to protect evidence related to the alleged unlawful conduct of Members of the Saeima, with criminal procedural immunity being attributed to the stage of prosecution only. Based on previous experience with similar studies, the MoJ has estimated the additional state budget funding required for this task in the amount of EUR 26,136⁶⁹, while indicating on the risk of cost increase in the conditions of inflation.

The issue of allocating additional state budget resources to institutions for the implementation of the plan for 2024 and beyond is to be addressed in the process of preparing the draft law “On the State Budget for 2024 and the Budget Framework for 2024, 2025 and 2026”, together with the requests for priority measures from all ministries and other central state institutions.

⁶⁹ The hourly rate of an expert is EUR 90.00 + VAT (average rate for lawyers representing law offices working in the field of criminal law), volume provided for the study: 240 hours (one and a half months)

Summary of state and local government budget funding needed to implement the actions in the plan

Line of action	Action	Budget programmes (sub-programme code and title)	Financing stipulated in the Medium-Term Budget Framework Law			Additional funding required					Year of implementation of the measure (if the implementation of the measure is fixed-term)
			2023	2024	2025	2023	2024	2025	In the further period until the completion of the measure (if the implementation of the measure is fixed-term)	Annually thereafter (if the implementation of the measure is fixed-term)	
Total financing for the implementation of the plan			0	0	0	0	30,000	26,136	0	0	-
including											
03 Cabinet of Ministers							30,000				
19 Ministry of Justice								26,136			
2	2.2.2. A study has been conducted on the practice	Cabinet of Ministers 01.00.00 “Ensuring the functioning of the Cabinet of Ministers, public	0	0	0	0	30,000	0	0	0	2024

	of applying codes of ethics in institutions of a public person.	administration policy”									
9	9.2. To ensure that criminal procedural immunity applies to the prosecution stage only.	Ministry of Justice 97.00.00 Sectoral management and policy planning	0	0	0	0	0	26,136	0	0	2025
Local government budget			0	0	0	0	0	0	0	0	-

VI. Reporting and Evaluation Procedures

When ensuring the implementation of the Anti-Corruption Action Plan, KNAB is responsible for the overall implementation thereof. KNAB coordinates and monitors the implementation of the measures set out in the Anti-Corruption Action Plan.

The institution responsible for the implementation of the relevant measures provided for in the Anti-Corruption Action Plan shall ensure the implementation of the tasks and measures within the set deadlines and within the budget allocated to them, as well as shall submit information to KNAB on the progress and results of the implementation of the tasks. The institutions responsible for the implementation of the measures included in the plan shall submit information on the progress of the implementation of the measures to KNAB by 1 February every year, starting from 2024, as well as information on the results of the implementation of the measures of the plan for the entire period of implementation of the plan by 31 December 2025. KNAB shall submit an evaluation of the implementation of the Anti-Corruption Action Plan to the CM by 1 May 2026.

Prime Minister

(signature*)

A.K.Kariņš

* The document has been signed with a secure electronic signature