

Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021–2023

PUBLICATIONS OF THE FINNISH GOVERNMENT 2020:68

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Publications of the Finnish Government 2021:68

Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021–2023

Ministry of Justice, Finland, Helsinki 2021

Publication distribution

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Publication sale

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Government**

vnjulkaisumyynti.fi

Ministry of Justice, Finland
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ISBN pdf: 978-952-383-678-5
ISSN pdf: 2490-0966

Layout: Government Administration Department, Publications

Helsinki 2021, Finland

Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021–2023

Publications of the Finnish Government 2021:68

Publisher Finnish Government

Author(s) Juuso Oilinki

Group author Ministry of Justice and the Preparation and Steering group for the National Anti-Corruption Strategy and Action Plan

Language English **Pages** 43

Abstract In November 2019, the Ministerial Working Group on Internal Security and Strengthening the Rule of Law decided to launch further preparation of an anti-corruption strategy. On 23 April 2020, the Ministry of Justice appointed a preparation and steering group to draft an anti-corruption strategy and action plan.

The group utilised the draft strategy formulated by the anti-corruption cooperation network in the preparation of the Strategy and Action Plan. The preparation work also took into account the UN Sustainable Development Goals (2030 Agenda) and the recommendations issued by the UN, the OECD, the Council of Europe and the European Union to Finland to reinforce its anti-corruption work.

The objective of the Strategy is to intensify the fight against corruption in the short term, and in the long term to build a society where corruption has no chance of success. To reach the objectives of the Strategy, the preparation and steering group drew up the Action Plan, which includes scheduled measures for which different authorities and stakeholders are responsible.

The Action Plan will be implemented in 2021–2023. The preparation and steering group will monitor the implementation and report on the progress to the Ministerial Working Group on Internal Security and Strengthening the Rule of Law.

Keywords corruption, criminal policy, crime prevention, ethics, good governance

ISBN PDF 978-952-383-678-5 **ISSN PDF** 2490-0966

Project no. OM045:00/2020

URN address <http://urn.fi/URN:ISBN:978-952-383-678-5>

Valtioneuvoston periaatepäätös kansalliseksi korruptionvastaiseksi strategiaksi ja toimenpideohjelmaksi 2021–2023

Valtioneuvoston julkaisuja 2021:68

Julkaisija Valtioneuvosto

Tekijä/t Juuso Oilinki

Yhteisötekijä Oikeusministeriö ja Korruptionvastaisen strategian ja toimenpideohjelman valmistelu- ja ohjausryhmä

Kieli englanti

Sivumäärä 43

Tiivistelmä Oikeusvaltion kehittämisen ja sisäisen turvallisuuden ministeriryhmä päätti marraskuussa 2019 käynnistää korruption vastaisen strategian jatkovalmistelun. Oikeusministeriö asetti 23.4.2020 valmistelu- ja ohjausryhmän korruptionvastaisen strategian ja sitä koskevan toimenpideohjelman valmistelua varten.

Valmistelussa hyödynnettiin korruptionvastaisen yhteistyöverkoston laatimaa strategialuonnosta. Strategian ja toimenpideohjelman valmistelussa on myös huomioitu YK:n, OECD:n, Euroopan neuvoston ja EU:n Suomelle osoitetut korruption vastaisen työn tehostamiseen liittyvät suositukset sekä YK:n kestävän kehityksen (Agenda 2030) tavoitteet.

Strategialla pyritään lyhyellä aikavälillä tehostamaan korruption torjuntaa ja pitkällä aikavälillä rakentamaan yhteiskuntaa, jossa korruptiolla ei ole menestymisen mahdollisuuksia. Strategian tavoitteiden saavuttamiseksi valmistelu- ja ohjausryhmä laati toimenpideohjelman, joka sisältää aikataulutettuja ja vastuutettuja toimenpiteitä.

Toimenpideohjelman toimeenpano tapahtuu vuosina 2021–2023. Valmistelu- ja ohjausryhmä seuraa toimeenpanoa ja raportoi siitä oikeusvaltion kehittämisen ja sisäisenturvallisuuden ministeriryhmälle.

Asiasanat korruptio, kriminaalipolitiikka, rikosentorjunta, etiikka, hyvä hallinto

ISBN PDF 978-952-383-678-5

ISSN PDF 2490-0966

Hankenumero OM045:00/2020

URN-adress <http://urn.fi/URN:ISBN:978-952-383-678-5>

Statsrådets principbeslut om en nationell strategi och ett åtgärdsprogram för bekämpning av korruption 2021–2023

Statsrådets publikationer 2021:68

Utgivare Statsrådet

Författare Juuso Oilinki

Utarbetad av Justitieministeriet och Berednings- och styrgruppen för strategin och åtgärdsprogrammet för bekämpning av korruption

Språk engelska

Sidantal

43

Referat Ministerarbetsgruppen för utvecklande av rättsstaten och för inre säkerhet beslutade i november 2019 att inleda den fortsatta beredningen av en strategi mot korruption. Den 23 april 2020 tillsatte justitieministeriet en berednings- och styrgrupp för beredning av strategin mot korruption och det åtgärdsprogram som gäller den.

Vid beredningen användes det strategiutkast som utarbetats av samarbetsnätverket mot korruption. I arbetet har också beaktats FN:s, OECD:s, Europarådets och EU:s rekommendationer till Finland om en intensifiering av antikorrupsionsarbetet samt FN:s mål för hållbar utveckling (Agenda 2030).

På kort sikt är målet med strategin att effektivisera bekämpningen av korruption och på lång sikt att bygga upp ett samhälle där korruption inte kan få fotfäste. För att nå målen i strategin utarbetade berednings- och styrgruppen ett åtgärdsprogram som innehåller schemalagda åtgärder med definierade ansvariga.

Åtgärdsprogrammet genomförs 2021–2023. Berednings- och styrgruppen följer upp genomförandet av programmet och rapporterar om utfallet till ministerarbetsgruppen för utvecklande av rättsstaten och för inre säkerhet.

Nyckelord korruption, kriminalpolitik, brottsbekämpning, etik, god förvaltning

ISBN PDF 978-952-383-678-5

ISSN PDF 2490-0966

Projektnr. OM045:00/2020

URN address <http://urn.fi/URN:ISBN:978-952-383-678-5>

Contents

1	Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021–2023	7
2	Current state.....	8
3	General.....	9
4	Key development areas for combating corruption set out in the Strategy	10
5	Action Plan of the Anti-Corruption Strategy for 2021–2023.....	13

1 Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021–2023

The aim of the Anti-Corruption Strategy is to:

1. **commit public administration and political actors to combat corruption effectively;**
2. **promote the identification of corruption and the transparency of decision-making;**
3. **seek to improve the ability of authorities to hold those who have engaged in corrupt practices accountable for their actions;**
4. **facilitate the creation of national situation awareness of corruption.**

2 Current state

Corruption is harmful in many ways to individuals and society at large. Corruption has serious consequences that slow down economic development, and that undermine democracy, the implementation of human rights and competitiveness. If no effective efforts are made to prevent corruption, the credibility of the rule of law will also be weakened.

Corruption means any abuse of a position of authority for personal gain. No country is without corruption, and this holds true for Finland as well. While open 'street-level' corruption is very rare in Finland, studies show that corruption exists in Finland at all levels of society and in many different sectors and contexts. Instead of street-level corruption, structural corruption that is more difficult to detect appears in Finland. This kind of corruption occurs often in the interface between the public and private sectors and as part of other economic crime. Corruption in Finland is, to a large extent, hidden crime, and only some of the corruption offences are brought to the attention of the authorities. Statistical data on corruption are incomplete and relatively little research has been carried out on corruption. High-risk sectors for corruption are construction, public procurement and competitive tendering, urban planning, political decision-making, and party and election funding. Other areas with a high risk of corruption are foreign trade and sports. Corruption typically takes the form of giving and accepting undue advantages, conflicts of interest and favouritism. It also appears in the form of unethical preparation of decisions outside the formal decision-making structures.

The importance of preventing and combating corruption is raised in several international conventions, recommendations, guidelines and other publications. It has been stressed in many contexts how important it is to take systematic and determined action against corruption. For example, Article 5 of the United Nations Convention against Corruption (UNCAC) requires that the States Parties to the Convention shall develop and implement or maintain effective, coordinated anti-corruption practices and policies. Reducing corruption and bribery is one of the targets under the UN Sustainable Development Goals, which were adopted in September 2015 by Finland among other countries. This means that Finland is expected to adopt measures to reduce corruption in all its forms by 2030. In addition, Finland is committed to the work of the Organisation for Economic Co-operation and Development (OECD), the Council of Europe and the European Union against corruption as part of international anti-corruption cooperation.

3 General

In November 2019, the Ministerial Working Group on Internal Security and Strengthening the Rule of Law decided to launch further preparation of an anti-corruption strategy. The short-term objective of this Strategy is to reinforce the prevention and combating of corruption. The vision and long-term objective of the Strategy is to build a society where corruption cannot take hold or go unnoticed.

The Strategy will have a preventive effect on corruption and will strengthen ethically sound practices in public administration and companies. The Strategy and the related Action Plan will also help to prevent and combat corruption in the context of public procurement and increase the transparency of procurement, which in turn will promote healthy competition. Additionally, the Strategy will have a positive impact on the transparency and credibility of political decision-making.

As outlined in the Government Programme, the Anti-Corruption Strategy will support the implementation of sustainable development objectives, such as those aimed at the strengthening of the rule of law and good governance, and the reduction of corruption and bribery. Measures under the Action Plan of the Strategy may be implemented as separate projects or as part of other strategies of the Government, such as the Action Plan for Tackling the Grey Economy and Economic Crime.

The Strategy is in line with the UN Sustainable Development Goals (2030 Agenda) and the recommendations issued by the UN, the OECD, the Council of Europe and the European Union to Finland to reinforce its anti-corruption work.

4 Key development areas for combating corruption set out in the Strategy

Although anti-corruption work has been intensified in recent years, the Government considers that the work to combat corruption should be more systematic and comprehensive at national level. On 23 April 2020, the Ministry of Justice appointed a preparation and steering group to draft an anti-corruption strategy and action plan for Finland to improve the effectiveness of anti-corruption and prevention measures. In 2015, the anti-corruption cooperation network started preparing a draft anti-corruption strategy. In preparing the Strategy and Action Plan, the preparation and steering group utilised the draft strategy formulated by the anti-corruption cooperation network (2017).

Finland's active participation in international anti-corruption work, including the fight against cross-border crime and the fulfilment of international treaty obligations at national level and as part of Finland's external relations, are incorporated across the board in the development areas listed below.

Key development areas for the combating of corruption are:

1. Reinforcement and clarification of the official structures for preventing and combating corruption and improvement of cooperation between the parties involved

The structures of anti-corruption work in Finland will be reinforced and clarified and clear responsibilities will be established. In cross-administrative cooperation, means will be developed to improve the effectiveness of anti-corruption work and to implement the Strategy.

2. Raising awareness of corruption

To raise awareness of corruption, training will be organised for different target groups, and the Ministry of Justice's website, korruptiontorjunta.fi, and various other sources of information will be actively updated and utilised. It will be ensured that the authorities have both sufficient awareness of corruption and the necessary skills to combat corruption. Material relating to the prevention and combating of corruption will be

drawn up for different target groups, such as public officials (state and municipalities), companies and the sectors at risk of corruption.

3. Increase in transparency

In line with the Government Programme, transparency will be promoted in all decision-making. In particular, the transparency of the acts of public authorities and political activities will be promoted. Measures will be explored and implemented to enhance the identification and monitoring of private interests and conflicts of interest, including through the wider use of the transparency register and open data. At the same time, measures will be sought and taken to increase transparency in the economic activities and decision-making principles of publicly owned companies, for example through improving access to documents and openness of decision-making.

4. Promoting the exposure of corruption

To intensify the exposure of corruption requires better operating conditions for key authorities. The exposure of corruption cases will be enhanced by improving access to information for authorities central to the fight against corruption and by promoting opportunities for reporting. For example, the EU Directive on the protection of whistleblowers requires wide-ranging awareness raising and possibly reorganisation of official structures for the establishment of a confidential reporting channel. Increasing awareness of corruption is essentially linked to enhancing the exposure of cases.

5. Examination of the functioning of legislation relevant to the prevention of corruption, and the development of legislation

To assess the functioning of legislation relevant to preventing corruption and to develop such legislation, it will be examined how the criminal procedure works in connection with bribery offences, for example. The aim is to examine potential problems in the identification of bribery cases and in criminal procedures, and to evaluate and implement other key measures in the fight against corruption.

6. Promotion of research related to corruption and its prevention

To increase up-to-date information, research on corruption will be promoted. Only a small amount of information is available on the corruption occurring in Finland. Corrupt practices tend to take place away

from the public eye, and annually only a few suspected cases of corruption are reported to the police or other authorities. Very few corruption cases come to the attention of the authorities or the public.

To reach these objectives, the Action Plan of the Strategy includes scheduled measures, and the implementation and effectiveness of these will be monitored and assessed. The Strategy and Action Plan were drawn up by the preparation and steering group led by the Ministry of Justice and presented to the Ministerial Working Group on Internal Security and Strengthening the Rule of Law. The task of the preparation and steering group appointed by the Ministry of Justice is to guide and coordinate the implementation of the Strategy and the related Action Plan and to report on the progress of the measures to the Ministerial Working Group on Internal Security and Strengthening the Rule of Law.

5 Action Plan of the Anti-Corruption Strategy for 2021–2023

Each authority implements their planned measures within their own jurisdiction in accordance with relevant statutes.

1. Reinforcement and clarification of the official structures for preventing and combating corruption and improvement of cooperation between the parties involved

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
1.1.1. Coordination and cooperation to be enhanced.	Set up an operational cooperation group to enhance the fight against corruption and to improve operational cooperation between the authorities.	National Prosecution Authority, National Bureau of Investigation / Helsinki Police Department, Finnish Competition and Consumer Authority, Finnish Tax Administration, Financial Intelligence Unit, Customs	2021	Carried out as part of official duties.	Working group appointed. (Yes/No) Reporting of results.
	Ministries appoint contact persons for the prevention and combating of corruption to draw attention to corruption issues within their own organ-	Ministries	2021	Carried out as part of official duties.	Contact persons appointed by ministries (number). Operations launched. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	isation, to monitor the implementation of the Anti-Corruption Strategy and report on it to the Ministry of Justice, which supports ministries in anti-corruption work.				
1.1.2. Exposure of corruption offences and support for investigation.	<p>With existing structures and resources strengthen the National Bureau of Investigation's anti-corruption function, utilising existing official structures and focusing on the detection of corruption offences and support for investigation.</p> <p>The function is responsible for</p> <ul style="list-style-type: none"> – collecting operative tips, intelligence and information and other reports on corruption, for their analysis and for bringing cases for criminal investigation on a national level, – disseminating good practices and for communications to make prevention successful, 	Ministry of the Interior, National Police Board, National Bureau of Investigation	2021	Carried out as part of official duties.	National Bureau of Investigation's anti-corruption function strengthened. (Yes/No) Reporting of results.

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
1.1.3. Development of anti-corruption activities by criminal investigation authorities.	<ul style="list-style-type: none"> – maintaining the operational situation awareness of the police concerning corruption, – receiving and analysing investigation requests, tips and other information from authorities, and bringing cases for criminal investigation on a national level, – coordinating the national contact person network of the police, – developing national and international cooperation between authorities and stakeholders, and improving the exchange of information jointly with the National Police Board and other police departments. 	National Police Board, Border Guard, Customs	2022	Carried out as part of official duties.	Strategy/policy prepared. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	(i) Prepare rules/requirements for appropriate procedures for the police, the Border Guard and Customs from the perspective of integrity and anti-corruption, which are made easily accessible to the public; (ii) supplement these rules/requirements with practical implementation measures, including, in particular, confidential advisory services and special, mandatory induction and continuing training. Pay particular attention to ethical management training (GRECO 5, paragraph 132).	National Police Board, Border Guard, Customs	2022	Carried out as part of official duties.	Rules of procedure prepared and published. (Yes/No)
	Ensure that the recruitment and career advancement processes of the police, the Border Guard and Customs (i) use appropriate inspections and supervision to prevent an individual from having an inappropriate influence on the process and (ii) build internal complaint/mediation mechanisms (GRECO 5, paragraph 140).	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties.	Reporting on the implementation of the measures. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	Develop a functioning system for outside employment permits for the police and organise effective monitoring of this system (GRECO 5, paragraph 151).	National Police Board	2022	Carried out as part of official duties.	System developed. (Yes/No)
	Develop guidance for the police, Border Guard and Customs on the requirements and procedures that officials must follow when forming private interests and taking up outside employment and when negotiating on a future employment contract, which they will enter into after working for the police, the Border Guard or Customs (GRECO 5, paragraph 152).	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties.	Guidance arranged. (Yes/No)
	(i) Prepare a plan on the collection of data to further improve police risk management to prevent corruption; and (ii) allow more stringent internal oversight through regular cross-checks and inspection of registers (GRECO 5, paragraph 163);	National Police Board	2022	Carried out as part of official duties.	Plan prepared and internal oversight enhanced. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	(i) Require the police, border authorities and customs authorities to report corruption and (ii) enhance, in this respect, the protection of whistleblowers (GRECO 5, paragraph 168);	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties.	Provisions laid down on the reporting obligation, and the protection of whistleblowers improved. (Yes/No)
	Organise special guidance and training on the protection of whistleblowers at all hierarchy levels in the police, the Border Guard and Customs (GRECO 5, paragraph 169).	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties.	Guidance and training organized. (Yes/No)
1.1.4. Measures aimed at ensuring that authorities acting in the criminal procedure chain have adequate means to combat corruption will be enhanced.	Take steps to ensure that after the planned restructuring of the prosecution service, cases concerning foreign corruption will be referred to prosecutors with sufficient expertise and experience on the subject (OECD 4, 2a).	National Prosecution Authority	2021–2023	Carried out as part of official duties.	Reporting.
	Take steps to ensure that the resources allocated to the National Bureau of Investigation to combat foreign bribery are kept at the current level and that the prosecution ser-	National Police Board, National Bureau of Investigation, National Prosecution Authority	2021–2023	Carried out as part of official duties.	Reporting.

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	vice's resources are sufficient to enable prosecutors to continue to participate in the investigation of foreign bribery cases at an early stage (OECD 4, 2b).				
	Take steps to ensure that courts and judges dealing with foreign corruption cases have specialised expertise and experience in dealing with such cases (OECD 4, 2c).	National Courts Administration	2021–2023	Carried out as part of official duties.	Reporting. (Yes/No)
	Prepare detailed, written material for criminal investigators, prosecutors and judges (either jointly or separately) on what is required to fulfil the essential elements of a foreign bribery offence in accordance with Article 1 of the Convention (e.g. OECD 4, 3a).	Ministry of Justice, National Courts Administration, National Prosecution Authority, National Police Board	2022	Carried out as part of official duties utilising the results of the Government's analysis, assessment and research activities (TEAS) project concerning evidence requirement analysis.	Prepared. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	Plan comprehensive training, using the information specified above in Recommendation 3a, for criminal investigators, prosecutors and judges on the application of the definition of foreign bribery offences (OECD 4, 3b).	Ministry of Justice, National Police Board, National Prosecution Authority, National Courts Administration	2021–2023	Carried out as part of official duties.	Training organized. (Yes/No)
	Encourage prosecutors to make full use of the possibility of demanding business prohibitions in foreign corruption cases (OECD 4, 4a).	National Prosecution Authority	2021–2023	Carried out as part of official duties.	Reporting.

2. Raising awareness of corruption

2.1. General awareness of corruption

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
2.1.1. People know what corruption means and understand the damage it causes.	Maintain and update the national anti-corruption website (<i>www.korruptiontorjunta.fi</i>) through which the public, companies and authorities receive objective, fact-based information on corruption and reporting practices.	Ministry of Justice and the anti-corruption co-operation network and contact persons from ministries	2021–2023	Carried out as part of official duties.	The site is being updated and is in active use. (Yes/No) Visitor numbers 2020, 2021, 2022, 2023
	Actively communicate anti-corruption actions on the websites and in the newsletters of authorities/agencies and in the media.	Ministry of Justice and the anti-corruption co-operation network Agency contact persons in matters related to corruption	2021–2023	Carried out as part of official duties.	Active distribution of information. (Yes/No)
	Organise training and distribute anti-corruption and prevention materials to the branch of government of the Ministry of Education and Culture.	(Ministry of Education and Culture)	2021–2023	Carried out as part of official duties.	Training organized. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	Highlight the importance of the fight against corruption at various public events and special events aimed at increasing corruption awareness in conjunction with the Anti-Corruption Day.	Ministry of Justice, the anti-corruption co-operation network and stakeholders	Annually/on 9 December	Carried out as part of official duties.	Annual events. (Yes/No)
2.1.2. An effort will be made to increase the awareness of media representatives in the area of corruption and its prevention.	Develop interaction between authorities and the media through new forms of cooperation.	Ministry of Justice and the anti-corruption co-operation network	2021–2023	Carried out as part of official duties.	New forms of cooperation developed. (Yes/No)
2.1.3. Increase the awareness of corruption that takes place abroad.	Take steps to raise awareness of existing guidelines (e.g. OECD guidelines) and of how corruption abroad in the private sector can be tackled, including in sectors where risks are high, such as the defence industry, state-owned companies, SMEs, and in sectors for legal advice, and accounting and auditing professionals (OECD Recommendation 3, 5c).	Ministry of Justice, Ministry of Economic Affairs and Employment, Ministry of Finance, Ministry of Defence, and stakeholders	2021–2023	Carried out as part of official duties.	Awareness increased. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
2.1.4. National situation awareness of corruption will be developed and maintained.	Design a monitoring method, and prepare a situation report on corruption every two years.	Ministry of Justice, Police University College	2022–2023	Requires additional funding, for which an application has been submitted to the Internal Security Fund (ISF).	Monitoring method prepared and report published. (Yes/No)

2.2. Awareness of corruption and the development of expertise in combating corruption in the public sector

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
2.2.1. Awareness among state, municipal and regional government officials, employees and elected officials of the forms of manifestation of corruption and its harmful effects, and of the means to combat corruption will be increased.	Prepare and implement ethics guidelines on preventing and combating corruption for state and municipal officials and for other local and regional operators, including publicly owned companies.	Ministry of Finance and Ministry of Justice in cooperation with other ministries	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling the Grey Economy and Economic Crime. Otherwise carried out as part of official duties.	Guidelines prepared and shared with relevant parties. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	<p>Launch a separate corruption and ethics website aimed specifically at officials under the national anti-corruption website (korruptiontorjunta.fi) that will include an online training module on corruption.</p> <p>An effort will be made to use this training as part of the induction of new officials.</p>	<p>Ministry of Justice, Ministry of Finance and Prime Minister's Office</p>	2021–2023	Carried out as part of official duties.	<p>Website created. (Yes/No)</p> <p>Online training created and introduced. (Yes/No)</p> <p>Shared using eOppiva. (Yes/No)</p> <p>The training is now part of the induction of new officials. (Yes/No)</p>
	<p>Organise thematic training on the risks of corruption for officials, internal auditors and elected officials engaging in recruitment, zoning and land use planning, procurement, construction contracts and government grants.</p>	<p>Ministry of Justice and other ministries</p> <p>Will be implemented as part of the Action Plan for Tackling the Grey Economy and Economic Crime in cooperation with stakeholders.</p>	2021–2023	<p>Funding in part under project 1.3. of the Action Plan for Tackling the Grey Economy and Economic Crime.</p> <p>Otherwise carried out as part of official duties.</p>	<p>Training organized. (Yes/No)</p> <p>Survey sent to participants on the usefulness of the training. (Yes/No)</p>
2.2.2. Officials and elected officials participating in anti-corruption work have the necessary	<p>Give specialised, and when necessary, joint training sessions, on corruption to special prosecutors, police</p>	<p>Police University College, National Prosecution Authority, Ministry of Justice, Finnish</p>	2021–2023	Carried out as part of official duties	<p>Training completed. (Yes/No)</p>

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
knowledge and skills required for the prevention of corruption, the fight against corruption and the investigation of corruption.	officers, the staff at courts of law and the Financial Intelligence Unit.	Competition and Consumer Authority, National Bureau of Investigation, National Courts Administration			Number of persons trained? Feedback?
	Organise training for the police and prosecution service organisations on the recovery of proceeds from corruption-related offences (OECD 4, 5b).	National Prosecution Authority, National Police Board, National Bureau of Investigation, Police University College	2021–2023	Carried out as part of official duties.	Training completed. (Yes/No) Number of persons trained? Feedback?

2.3 Awareness of corruption in political activities

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
2.3.1. Increase the awareness of corruption among political actors.	Provide material on corruption and its manifestation to political parties, new MPs and other political representatives.	Parliament, Ministry of Justice	2022–2023	Carried out as part of official duties.	Materials prepared and distributed. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
2.3.2. Increase the awareness of corruption among ministers and senior officials in central government.	Investigate the necessary measures (e.g. rules of procedure, training, guidance and advisory services, monitoring and sanction mechanisms) for increasing the awareness of senior officials in central government on corruption (GRECO, paragraph 46, 48 and 65).	Prime Minister's Office: ministers Ministry of Finance: senior officials Ministry of Finance and Prime Minister's Office: political state secretaries and special advisers (working group)	2021–2022	Carried out as part of official duties.	Investigated and implemented. (Yes/No)
	Lay down provisions on procedures for preventing and avoiding conflicts of interest situations when members of Government move to other positions.	Prime Minister's Office	2021–2022	Carried out as part of official duties.	Provisions in force. (Yes/No)

2.4. Awareness of corruption in the private sector

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
2.4.1. Steps will be taken to increase the awareness of employees of state-owned companies on corruption and the fight against corruption.	State-owned companies will draw up an action plan against corruption and implement it in accordance with OECD guidelines.	Prime Minister's Office (Ownership Steering Department)	2022	Carried out as part of official duties.	State-owned companies have anti-corruption action plans in place (%). Action plans implemented. (Yes/No)
2.4.2. Steps will be taken to increase the awareness of companies engaged in international trade on corruption and the fight against corruption.	Organise discussion events on responsible business for companies engaged in international trade; these will include a section on corruption in international business relationships, its consequences and means for its prevention. Prepare and collect guideline materials on the topic. Where possible, utilise existing structures, channels and mechanisms.	Ministry of Economic Affairs and Employment, Ministry for Foreign Affairs, Ministry of Justice (in cooperation with Business Finland and key business organisations, companies and other relevant parties)	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling the Grey Economy and Economic Crime. Otherwise carried out as part of official duties and in cooperation with other key parties.	Seminars organized. (Yes/No) Survey sent to training session participants on the usefulness of the seminar: in better understanding of corruption phenomena. (Yes/No)
2.4.3. Awareness of SMEs concerning corruption and anti-corruption will be increased.	Continue the marketing of the anti-corruption guide prepared by the Ministry of Economic Affairs and Employment for SMEs with stakeholders and participate	Ministry of Justice, Ministry of Economic	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling	Awareness increased. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	in the planning and implementation of training and seminars for SMEs.	Affairs and Employment, and stakeholders		the Grey Economy and Economic Crime. Otherwise carried out as part of official duties and in cooperation with other key parties.	
2.4.4. Companies and other private actors receiving development cooperation funding know what corruption means and understand the damage it causes.	Organise training on responsible business practices, good administration, and statutes, conditions, restrictions and principles related to the use of discretionary government grants, including a section on the harmful effects, sanctions and prevention measures of corruption, for companies receiving development cooperation funding (Ministry for Foreign Affairs/Finnfund, etc.) and other private actors. Where possible, utilise existing structures, channels and mechanisms.	Ministry for Foreign Affairs/ Finnpartnership, companies	Annually	Carried out as part of official duties.	Training organized. (Yes/No) Survey sent to participants on the usefulness of the training. (Yes/No)
2.4.5. Employees at enterprises in the construction sector know what corruption means and understand the damage it causes.	Offer seminars to enterprises in the construction sector that focus on corruption and cartels in the construction sector,	Ministry of Justice, Ministry of the Environment, Finnish Competition and Consumer Authority, the police,	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling the Grey Economy and Economic Crime.	Seminars organized. (Yes/No) Survey sent to seminar participants on the

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	the damage caused by corruption, sanctions for corruption and means of preventing corruption.	the Finnish Tax Administration and stakeholders		Otherwise carried out as part of official duties and in cooperation with other key parties.	usefulness of the seminar. (Yes/No)
2.4.6. Parties subject to the reporting obligation under the Anti-Money Laundering Act know what corruption means and recognise its various forms.	Offer training to parties subject to the reporting obligation under the Anti-Money Laundering Act and other reporting bodies on the more effective identification of corruption.	National Bureau of Investigation, Regional State Administrative Agencies, Ministry of Justice, Police University College	2021–2023	Carried out as part of official duties.	Training organised. (Yes/No)
2.4.7. Efforts will be made to raise awareness of corruption among parties receiving significant government grants.	Take steps to increase awareness of the fight against corruption so that parties receiving government grants are familiar with the principles of good administration and the necessary processes and legislation related to the use of government grants.	Ministries	2021–2023	Carried out as part of official duties.	Awareness increased. (Yes/No)
2.4.8. Consideration of discretionary government grants to organisations promoting physical activity will include an assessment of how the organisations	Add good administration that includes measures against the manipulation of sports competitions (match fixing) to the	(Ministry of Education and Culture)	2021	Carried out as part of official duties.	Criteria taken into account in consideration of discretionary government grants. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
implement the principles of good administration in their activities.	criteria for granting discretionary government grants to organisations promoting physical activity.				

3. Increasing transparency

3.1. Increasing transparency in official activities

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
3.1.1. Transparency of decision-making will be increased in accordance with the Government Programme.	Take steps to investigate and assess the appropriate implementation of the principle of openness, the problem areas in its implementation and measures that will impact these.	Ministry of Justice	2021–2023	Carried out as part of official duties.	Investigated. (Yes/No) Targets achieved. (Yes/No)
3.1.2. Steps will be taken to examine ways to make appointment processes of senior officials more transparent.	Assess the grounds for the appointment of senior officials and examine the length of the periods in office as part of the power to appoint and, if necessary, update the relevant guidelines. Additionally, investigate the functioning of the	Ministry of Finance	2021	Carried out as part of official duties.	Investigation completed. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
3.1.3. Steps will be taken to limit or prevent the use of confidential information, or other information protected by provisions limiting its disclosure, and of the related knowledge in an employment relationship or activity for personal gain or the gain of another, or to the detriment of another in situations where public officials leave central government for other work opportunities.	<p>prohibition of appeal laid down in the Act on Public Officials in Central Government.</p> <p>Officials dealing with exceptionally sensitive information or information with significant economic value are required to sign a non-compete agreement, making it possible to impose a non-compete period before they can take up employment with another employer (see GRECO 5, paragraph 82).</p> <p>Investigate possibilities to extend the same practice to regional and municipal officials.</p>	Ministry of Finance	2022–2023	Carried out as part of official duties.	<p>Non-compete agreements are being prepared with information on the length of a potential non-compete period. (Yes/No)</p> <p>Investigation completed. (Yes/No)</p>

3.2. Increasing transparency in political activities

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
3.2.1. Transparency of decision-making will be improved.	Prepare and adopt a transparency register (lobbying register).	Parliament prepares the legislative proposal, and the Ministry of Justice in cooperation with the register authority carry out its implementation.	2020–2023	A Parliament-guided project set up by the Government, which will be carried out in close cooperation with stakeholders.	Government proposal submitted. (Yes/No)
	In connection with the preparation of the transparency register, take steps to ensure that the good lobbying practices to be prepared will contain guidelines for increasing transparency and combating conflicts of interest.	Parliament prepares the legislative proposal, and the Ministry of Justice in cooperation with the register authority carries out its implementation.	2021–2023	A Parliament-guided project set up by the Government, which will be carried out in close cooperation with stakeholders.	Guidelines prepared. (Yes/No)
3.2.2. Steps will be taken to increase the transparency of the private interests of senior officials, ministers and special advisers.	With regard to all senior management (including special advisers), (i) standardise and specify the content and timing of the requirements for declarations of private interests; and (ii) consider the possibility of extending the scope of the declarations to include information on gifts, financial interests, secondary employment	Prime Minister's Office: ministers Ministry of Finance: senior officials Ministry of Finance, Prime Minister's Office: special advisers	2021–2022	Carried out as part of official duties.	Implemented. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	and debts of a spouse and dependent family members above a certain threshold (in which case, this information of close relatives may not necessarily need to be disclosed) (GRECO 5, paragraph 95); in addition, consider whether information on declared interests should be added to the transparency register.				
	Introduce a government gift register to which information on gifts received by ministers will be added.	Prime Minister's Office	2021	Carried out as part of official duties.	Introduced. (Yes/No)

3.3. Increased transparency in public procurement

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
3.3.1. The procurement process will be made more transparent and healthy competition will be enhanced.	Examine means for promoting access to information on direct procurements.	Ministry of Economic Affairs and Employment, Finnish Competition and Consumer Authority	2021–2023	Carried out as part of official duties.	Examination completed and development proposals prepared and, where possible, implemented. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	Investigate ways of effectively preventing conflicts of interest and private interests in decision-making in contracting entities that are limited liability companies.	Ministry of Finance, Ministry of Economic Affairs and Employment	2021–2022	Carried out as part of official duties.	Investigated. (Yes/No)
	Investigate means to improve access to information for contracting entities in connection with procurements.	Ministry of Finance, Ministry of Justice, Ministry of Economic Affairs and Employment	2021	Funding in part under project 3.1 of the Action Plan for Tackling the Grey Economy and Economic Crime. Otherwise carried out as part of official duties.	Means investigated and access to information improved. (Yes/No)
	Investigate the possibility of requiring declarations of private interests from persons involved in the preparation of procurements or other means of preventing conflicts of interest.	Ministry of Finance	2020–2022	Carried out as part of official duties.	Investigation completed. (Yes/No)

3.4. Promoting transparency in business

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
3.4.1. Operators have as much information as possible on the management of corporate responsibilities.	Investigate the possibility of setting up a public service from which the general public, companies and authorities can easily and cost-effectively verify that companies are fulfilling their statutory obligations as employers and contracting parties. Running this type of public service would require that information on companies included in the certificate for the fulfilment of obligations be made public by law.	Ministry of Finance/Tax Administration Will be implemented as part of the Action Plan for Tackling the Grey Economy and Economic Crime.	2021–2022	Resourcing will be from the funds allocated to the Action Plan for Tackling the Grey Economy and Economic Crime.	Investigation completed. (Yes/No) Provisions laid down to make the certificates for fulfilling obligations available to the public. (Yes/No)
3.4.2. Transparency of publicly owned companies will be increased.	In accordance with the Government Programme, take steps to assess whether the scope of the Act on the Openness of Government Activities should be extended to include legal persons owned or controlled by the public sector. In the assessment, take into account the market impacts of the different options and the effects on the competitive position of companies.	Ministry of Justice	2021–2023	Carried out as part of official duties.	Assessment and possible changes implemented. (Yes/No)

4. Promoting the exposure of cases of corruption

4.1. Promoting the exposure of corruption cases in election and party funding

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
4.1.1. The prerequisites for detecting the links between election and party funding and corruption will be improved.	Methods will be sought to further increase the transparency of the election funding received by local political organisations.	Parliament will investigate.	2020–2022	A Parliament-guided project set up by the Government.	Investigated. (Yes/No)
	Investigate the need for a legislative amendment that would increase the right of the National Audit Office to obtain from third parties necessary comparative information for the performance of control or audit tasks free of charge, where necessary.	Parliament will investigate.	2020–2022	A Parliament-guided project set up by the Government.	Investigated. (Yes/No)
	Take steps to determine whether it would be possible to draft a legislative amendment according to which all candidates in non-municipal elections should open a separate bank account as a campaign account and that donations addressed to the candidate for election should be paid to that election account.	Parliament will investigate.	2020–2022	A Parliament-guided project set up by the Government.	Investigated. (Yes/No)

4.2. Promoting the exposure of corruption cases in public activities

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
4.2.1. Corrupt practices in public procurement processes will be detected more effectively.	Improve the competence of persons working with public procurement in procurement processes and procurement legislation by increasing training as part of the activities of the Public Procurement Advisory Unit and the implementation of the objectives related to increasing the competence of the Hankinta-Suomi project.	Ministry of Economic Affairs and Employment, Ministry of Finance	2021–2023	Carried out as part of official duties.	Competence improved. (Yes/No)
	Organise training for internal auditing in municipalities to support increased awareness.	Principal responsibility: Ministry of Justice Others: Finnish Competition and Consumer Authority, Tax Administration, Association of Finnish Local and Regional Authorities, National Bureau of Investigation	2021–2023	Resourcing will be from the funds allocated to the Action Plan for Tackling the Grey Economy and Economic Crime.	Training organised. (Yes/No)
4.2.2. The prerequisites of internal audits to detect corruption will be improved.	Draw up and implement guidelines on corruption risks for internal audits of central government to strengthen the identification of corruption risks.	Ministry of Finance	2022	Carried out as part of official duties, will possibly require separate financing.	Guidelines prepared and implemented. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	Examine and implement methods for strengthening the autonomy of public sector internal audits.	Ministry of Finance	2022	Carried out as part of official duties.	Examined and implemented. (Yes/No)
	Examine and implement methods to ensure the adequate access of public actors to information for the internal auditing.	Ministry of Finance	2022	Carried out as part of official duties.	Examined and implemented. (Yes/No)

4.3. Facilitating easier means for reporting on suspected corruption and for the protection of the persons submitting a report

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
4.3.1. Information will be produced on the implementation of the EU Directive on the protection of whistleblowers.	Prepare guidelines on reporting channels, reporting practices and protecting whistleblowers.	Ministry of Justice	2022–2023	Funding has been applied for from the Internal Security Fund; Otherwise carried out as part of official duties.	Guidelines prepared and published. (Yes/No)
	Organise general communication, advice and guidance on reporting and the protection of whistleblowers,	Ministry of Justice, external reporting channel	2022–2023	Carried out as part of official duties.	Training organised. (Yes/No) ¹

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	and organise training for those receiving and processing reports and for the authorities and companies participating in the protection.				
4.3.2. The reporting of suspected corruption by officials to the competent authority will be further facilitated.	Examine the possibility of obligating officials to report suspected cases of bribery that they observe within the scope of their own duties to the competent authority (OECD 3, xi).	Ministry of Finance	2021–2023	Carried out as part of official duties.	Examination completed. (Yes/No)
	Investigate the role, operating methods and tools of public supervisory authorities, with the aim of strengthening their autonomy in relation to those whose activities they supervise and promoting reporting observations related to corruption at one's own initiative to the criminal investigation authorities.	Ministry of Finance	2021–2022	Carried out as part of official duties.	Investigation completed. (Yes/No)
	Examine the possibility of extending liability for acts in office to cover municipal and state majority-owned companies.	Ministry of Justice and Ministry of Finance	2020–2021	TEAS project under way.	Investigation completed? (Yes/No)

4.4. Enhancing the identification and exposure of foreign bribery, and international anti-corruption work

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
4.4.1. The ability of authorities to identify corruption will be improved.	Authorities prepare guidelines for their personnel operating abroad on how to identify corruption and how to proceed when corruption is detected.	Ministries	2021	Carried out as part of official duties.	Prepared. (Yes/No)
	The Ministry for Foreign Affairs prepares guidelines for all officials posted abroad; the guidelines must require reporting on foreign bribery, provide information on different reporting channels and provide instructions on how foreign bribery can be identified. (OECD 4, 1a). In addition, Finnish foreign missions monitor the corruption situation in their host countries as part of a wider operating environment and assess its impact on Finland's operations in the country.	(Ministry for Foreign Affairs)	2021	Carried out as part of official duties.	Prepared. (Yes/No)
	In the planning, implementation and monitoring.	(Ministry for Foreign Affairs)	2021	Carried out as part of official duties.	Guidelines improved. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	<p>of development cooperation, improve existing risk management guidelines and processes.</p> <p>This work will be supported by a risk management policy for development cooperation that is due to be completed during the first half of 2021.</p>				

5. Examination of the functioning of legislation relevant to the prevention of corruption, and the development of legislation

5.1. Ensure that legislation related to the fight against corruption is sufficiently effective and appropriate and that legal protection requirements are met

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
5.1.1. Assessment of criminalisation and necessary amendments.	Submit a legislative proposal on the criminalisation of trading in influence to Parliament.	Ministry of Justice	2021–2023	Carried out as part of official duties.	Government proposal submitted. (Yes/No)
	Increase the size of corporate fines (OECD 4, 4c).	Ministry of Justice	2021–2022	Carried out as part of official duties.	The size of corporate fines increased. (Yes/No)

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
	Investigate whether the provisions under chapter 30 of the Criminal Code on bribery offences in business should be amended so that the provisions related to bribery offences in public office and in business are more similar.	Ministry of Justice	2022–2023	The measure requires additional funding. Financial repercussions to be investigated.	Investigated. (Yes/No)
	Examine the adequacy of current regulation in the fight against competitive manipulation.	Ministry of Justice	2022–2023	The measure requires additional funding. Financial repercussions to be investigated.	Investigation completed. (Yes/No)
5.1.2. Implementation of the Whistleblower Directive.	Implementation of the EU Directive on the protection of whistleblowers.	Ministry of Justice	2020–2023	Carried out as part of official duties.	Legislation in force. (Yes/No)
5.1.3. Determine the possible need to develop the ministerial responsibility system.	Examine the possible need to develop the regulation concerning the ministerial responsibility system (e.g. GRECO 5, paragraph 109).	Ministry of Justice and Prime Minister's Office in cooperation	2022–2023	The measure requires additional funding.	Investigation completed. (Yes/No)
5.1.4. Effective recovery of criminal proceeds in cases of corruption.	Examine in the light of case law, the effectiveness of current regulation in the recovery of criminal proceeds in bribery offences (e.g. OECD 4, 5a).	Ministry of Justice, relevant authorities	2021–2023	Carried out as part of official duties.	Verified. (Yes/No)

6. Promotion of research related to corruption and its prevention

6.1. Increasing and utilising research data related to corruption

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation
6.1.1. Carry out research projects that will provide information on the nature and extent of corruption at national and international level.	Implement a project promoting the measurement and identification of corruption and utilise the results of the project in measuring and identifying national corruption.	Ministry of Justice, TEAS project	2022–2023	TEAS project money.	Studies completed and the data analysed. (Yes/No)
	Carry out a joint Nordic research project on the links between corruption and money laundering in international business.	Nordic Council of Ministers, Ministry of Justice, Police University College	2021–2022	Funded by the Nordic Council of Ministers.	Investigation completed. (Yes/No)
	Analysis and international comparison of evidence requirements in connection with bribery offences.	Ministry of Justice	2021–2022	TEAS project, funding approved on 5 November.	Implemented. (Yes/No)

SNELLMANINKATU 1, HELSINKI
PO BOX 23, 00023 GOVERNMENT, FINLAND
valtioneuvosto.fi/en/
julkaisut.valtioneuvosto.fi

ISBN: 978-952-383-678-5 PDF
ISSN: 2490-0966 PDF