



CPC

REPUBLIC OF SLOVENIA
COMMISSION FOR THE PREVENTION OF CORRUPTION
RULE OF LAW | INTEGRITY | TRANSPARENCY

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**Secretary of the Conference of the States Parties to the United Nations Convention against Corruption
Corruption and Economic Crime Branch
~~United Nations Office on Drugs and Crime~~**

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**SUBJECT: INFORMATION PROVIDED – Article 7, Paragraph 4 and Article 8, paragraph 5 of UNCAC
Convention**

To whom it may concern,

I hope this letter finds you well. Commission for the Prevention of Corruption of the Republic of Slovenia (hereinafter the Commission / CPC) has received your note regarding providing you information on preventing and managing conflict of interest (7/4) and on assets and interest disclosure (8/5).

With this regards we prepared all necessary information as follows:

The Commission for the Prevention of Corruption of the Republic of Slovenia (hereinafter CPC) is an independent state body like the human rights Ombudsman, Information Commissioner or the Court of Audit with a mandate in the field of preventing and investigating corruption, breaches of ethics and integrity of public office.

Although part of the public sector, the CPC is not subordinate to any other state institution or ministry and does not receive direct instructions from the executive or the legislature. While Slovenia has an eight years history of specialised anti-corruption bodies, the current CPC has been established with the adoption of the **Integrity and prevention of corruption Act of 2010** (with later amendments) and fulfils the requirement of an independent anti-corruption body as required by the UN Convention against Corruption (UNCAC) which Slovenia ratified.

Field of work and jurisdiction

The CPC has a wide mandate in the field of preventing and investigating corruption, breaches of ethics and integrity of public office. Its tasks, among others, include:

- conducting administrative investigations into allegations of corruption, conflict of interest and illegal lobbying;
- protection of whistleblowers;
- monitoring the financial status of high level public officials in the executive, legislature and judiciary through the assets declaration system;
- maintaining the central register of lobbyists;
- adopting and coordinating the implementation of the National Anti-corruption Action Plan;

- assisting public institutions in development of integrity plans (methodology to identify and limit corruption risks) and monitoring their implementation;
- designing and implementing different anti-corruption preventive measures (awareness raising, training, education ...);
- serving as a national focal point for international anti-corruption cooperation on systemic level (GRECO, OECD, UN, EU ...).

The CPC is not part of the law enforcement or prosecution system of Slovenia and its employees do not have typical police powers. They do, however, have broad legal powers to access and subpoena financial and other documents (notwithstanding the confidentiality level), question public servants and officials, conduct administrative investigations and proceedings and instruct different law enforcement bodies (e.g. Anti-money laundering Office, Tax Administration ...) to gather additional information and evidence within the limits of their authority. The CPC can also issue fines for different violations (sanctions can be appealed to the Court).

Independence

To strengthen its independence, the law provides a special procedure for appointment and dismissal of the leadership of the CPC. Chief Commissioner and two deputies are appointed by the President of the Republic of Slovenia following an open recruitment procedure and nomination by a special selection board. Candidates which must meet high professional and integrity standards are interviewed and screened by a selection board comprising a representative of the Government, the National Assembly, non-governmental organisations, the Independent Judicial Council and the Independent Council of Officials. The Chief Commissioners' term of office is six years, the deputies' five. They can serve up to two terms in office. Prior to the expiration of the mandate, they can only be dismissed from office by the President (on his/her own motion or on the motion of the Parliament) if they act in breach of the Constitution or the law.

Financial and human resources

The budget of the CPC is determined yearly by the Parliament and the CPC is autonomous in allocating and organising its financial and human resources and priorities within the budget. While the legal framework safeguarding the independence of the CPC and the material conditions for its work (facilities, information technology, etc) are generally satisfactorily, the CPC – due to fiscal restraints – remains seriously understaffed – in particular given the broad new mandate under the Act of 2010.

Accountability

Substantive decisions of the CPC (ruling on corruption, conflict of interest, violations of lobbying regulations etc.) are subject to judicial review of the Administrative Court. Under the Act the CPC must be the subject to periodic external audit the reports of which are submitted to the Parliament and the President and publicly available. The CPC is also required to present yearly reports to the Parliament for elaboration. In addition, by Act, decisions of the CPC (with few exceptions) must be published on the internet and various provisions require the CPC to publicise its work and its findings.

History

The predecessor of the CPC was Government's Office for the Prevention of Corruption established in 2002 on the recommendation of the Council of Europe Organization GRECO (Group of States against Corruption EC). In 2004 the National Assembly of Republic of Slovenia passed The Prevention of the Corruption Act in the Republic of Slovenia (ZPKor). By the adoption of the Prevention of Corruption Act the Office was replaced with the Commission for the Prevention of Corruption as an independent state body (appointed by and accountable to the Parliament) with a number of corruption-preventive tasks.

On 5th of June 2010, the Integrity and Corruption Prevention Act (ZIntPK) was adopted, while old act ZPKor expired. The Act has retained the name of the CPC, but significantly expanded its mandate, functions and powers. It also strengthened its independence and introduced additional safeguards and objectivity in the procedure for appointment and dismissal of its leadership. Most importantly, it expanded some of the investigative and sanctioning powers of the

CPC and made it not only the national focal point for prevention of corruption, but also for lobbying oversight, whistleblower protection, integrity of public sector and expanded its reach beyond the public into the private and business sector. The amendments to the Act adopted in June 2011 further strengthened the powers of the CPC to subpoena financial documents for the public and private sector and to hold accountable magistrates, officials, public servants, management and boards of public enterprises for corruption, conflict of interest or breach of ethics.

ARTICLE 7, PARAGRAPH 4:

1. Please describe (cite and summarize) the measures/steps your country has taken, if any, (or is planning to take, together with the related appropriate time frame) to ensure full compliance with these provisions of the Convention, and in particular to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.

2. Please outline the actions required to ensure or improve the implementation of the measures described above and any specific challenges you might be facing in this respect.

The main responsible body for strengthening transparency and preventing conflict of interest, incompatibilities of functions and restrictions of operation in Slovenia is the Commission for the Prevention of Corruption (hereinafter the Commission / CPC).

Regarding the existence of a possible conflict of interest, we should note the provisions of the IPCA, which provide that official persons (which includes civil servants throughout the public sector) must be watchful of any actual or possible conflict of interest and must do everything to avoid that, and official persons may not use their office or work in such a way that would afford them or another person any illicit private interest (Article 37).

Pursuant to the same law, a conflict of interest is defined as a circumstance where the private interest of the official person influences or gives the impression of influencing the impartial and objective performance of their public tasks, where private interests are defined as material or non-material benefits for the official person, their family members, and other individuals or legal entities with whom that person has or has had personal, business or political connections. Concerning the possible existence of a conflict of interest, the civil servant's head of department (where they are informed of the existence or possibility of a conflict of interest) or the CPC, if the civil servant does not have a head of department, decides within 15 days and informs the official person. In deciding on the possible existence or otherwise of a conflict of interest, the head of department or Commission determines the existence of elements relative to the stated provisions.

If there is a possibility that a conflict of interest has arisen in the official conduct of official persons, the CPC may initiate a procedure for the establishment of the actual existence of the conflict of interest and its consequences. If it is established, on the basis of the procedure carried out, that a conflict of interest has arisen, the CPC shall inform the competent authority or the employer and set the time limit by which the body or the employer is obliged to inform it of the measures taken in this respect. If the CPC finds that, in the situation addressed, an official person knew or should have or could have known that the conflict of interest existed but, despite this, acted in contravention of the provisions on the prevention of conflicts of interest, the Commission shall inform all other competent authorities. The CPC may initiate a procedure referred to in paragraph 1 of this Article within two years of the performance of the official acts.

Where the findings relate to a senior office holder or official, the CPC sends the findings to the head of the body or to the body competent for directly overseeing the work of the person in question or their appointment and dismissal. Within 30 days, that body must introduce controls and disciplinary procedures and adopt appropriate measures in accordance with the law, the code of conduct and integrity plan, and notify the CPC accordingly (seventh paragraph of Article 13 of the IPCA).

For civil servants in state bodies and local community administrations the ZJU also regulates the prohibition on performing activities and conflicts of interest (paragraph seven of Article 100). An civil servant who observes that a situation has arisen where their personal interest might affect the impartial and objective

performance of their tasks or where the circumstances would arouse doubt about their impartiality and objectivity, must immediately where possible in view of the circumstances notify the head of the body and act in accordance with the head's instructions. In such case the head of the body must ensure that tasks are performed lawfully, impartially and objectively, and must verify whether they have indeed been performed in this way.

In the event that seriously corrupt conduct has been established, the CPC sends to the body competent for appointment and dismissal a proposal for dismissal, regarding which it also notifies the public (tenth paragraph of Article 13 of the IPCA).

Having in mind above mentioned we can divide Slovenian "interest" disclosure in following instances:

"Preliminary" interest disclosure:

a) A public official must disclose entities in which they or their family member are participating as a manager, management member or legal representative, or in which they have more than a 5% share of participation in the founders' rights, management or capital, either by direct participation or through the participation of other legal persons. According to Article 35 of the IPCA, such entity should not conduct business with the public sector body or organisation in which the public official holds the office. The declaration has to be submitted no later than one month after taking the public office and afterwards within eight days of any change occurring.

b) According to Article 26 of the IPCA, a professional public official may not be engaged in any professional or other activity aimed at generating income or proceeds, except pedagogical, scientific, research, artistic, cultural, sports and publishing activities, managing their farm or their own assets. If a public official intends to engage in pedagogical, scientific, research, artistic or cultural activities, they must disclose such an activity to the CPC. Such a declaration should be made at least 8 days before the engagement in the abovementioned activity.

c) There is no obligation for other official persons to preliminary disclose their interests (meaning before the entering into the office).

Ad hoc interest disclosure:

d) Any official person who, upon taking up a post or office or during the performance of the duties of the post or office, finds that a conflict of interest has arisen or might arise, must immediately declare their contravening private interest. The rules governing the ad hoc disclosure of interest are stipulated in special procedural acts (e.g. Administrative Procedure Act, Criminal Procedure Act, Labour Act, and Public Procurement Act); if no such rules exist, general conflict of interest rules stipulated in the IPCA apply. Despite the fragmentation of the ad hoc interest disclosure rules, there are no major differences among them.

The ad hoc interest declaration rules apply to official persons. The term "official person" includes elected and appointed officials, senior public officials, other public officials and civil servants as well as managers, members of management and supervisory boards, and employees of state owned enterprises.

The preliminary declarations of interests are collected and kept by the CPC. The ad hoc declarations are stored by the body or organization responsible for carrying out the official task to which the situation of conflict of interest relates. Such declarations are not publically available. However they can be received under the system of free access of the information (explained in details in further text under this point).

IPCA also defines fines for not obeying mentioned provisions:

- A fine of between EUR 400 and EUR 1 200 shall be imposed on an individual who
 - fails to immediately inform his superior or the Commission of a conflict of interest or the possibility that a conflict of interest may arise.

Incompatibilities of functions IPCA defines as follows:

Article 26

(Incompatibility of office and exceptions)

(1) A professional official holding a public office may not be engaged in any professional or other activity aimed at generating income or proceeds.

(2) Notwithstanding the provision of the preceding paragraph, professional officials may engage in pedagogical, scientific, research, artistic, cultural, sports and publishing activities, manage a farm and their own assets, unless otherwise provided by another Act. An official who obtains permission from his employer or enters into a contract to engage in one of the aforementioned activities, except in the cases of sports and publishing activities and of managing a farm or one's own assets, shall notify the Commission of this in writing within eight working days of the commencement of the activity and enclose with the notification the employer's permission and the contract under which he may perform the activity or profession.

(3) The Commission may within fifteen working days of receipt of the notification referred to in the preceding paragraph initiate a procedure for assessing the incompatibility of office if it considers that the performance of the activity, given the actual scope and nature of the activity in question and the office held by the professional official, is likely to present a disproportionate risk to the objective and impartial discharge of the duties of the office, or jeopardise its integrity. In this case, the Commission may issue a decision prohibiting the official from performing an additional activity or imposing conditions or restrictions on the official that must be complied with when performing the activity.

(4) Unless otherwise provided by another Act, the Commission may allow a professional official to perform a professional or other activity aimed at generating income, taking into account the public interest and the level of risk the performance of the activity poses to the objective and impartial discharge of the duties of the office or to its integrity. If a professional official wishes to obtain income from the body in which he holds office, the Commission shall not issue an authorisation. If the Commission issues an authorisation, it may impose conditions and limitations on the official that must be complied with when performing another activity.

(5) If the Commission finds that the official has not complied with the conditions and restrictions imposed by the decision referred to in paragraph 3 or the authorisation referred to in the preceding paragraph, or that the official performs a professional or other activity in a manner that interferes with the objective and impartial discharge of the duties of his office, it shall issue a decision revoking the authorisation. The official shall immediately or no later than after the decision on revocation of the authorisation has become final cease to perform the professional or other activity in question.

(6) In an administrative dispute against the Commission's decision on the revocation of the authorisation, the Administrative Court shall give priority to the matter. (7) If the official does not cease to perform the professional or other activity after the decision on the revocation of the authorisation has become final, the Commission shall inform the body responsible for the appointment and dismissal of the official. The body shall take appropriate measures against the official within 30 days in accordance with the law and its integrity plan and shall inform the Commission of this.

Article 27

(Prohibition of membership and activities)

(1) A professional official may not be a member of a company, economic interest grouping, cooperative, public institute, public fund, public agency, or other entity governed by public or private law, or engaged in management, supervision or representation activities in these entities, the exceptions being societies, institutions and political parties.

(2) A non-professional official may not be a member of any entity governed by public or private law referred to in the preceding paragraph, or engaged in management, supervision or representation activities in these entities if the duties of his office include direct supervision of their work.

(3) The prohibition under paragraph 1 of this Article regarding the membership of public institutes, public funds, public agencies and other entities governed by public or private law, and the performance of management, supervision or representation activities in these entities, if the entity governed by private law is a holder of public authority or a public service provider, shall also apply to non-professional mayors and deputy mayors who hold their office in the municipality that is related to the entities referred to in this paragraph in terms of founding, ownership, supervision and finance.

Article 28

(Termination of activity, office or membership)

(1) An official who, prior to taking office, performed an activity or held an office that is incompatible with his office under this Act or is contrary to the preceding Article shall cease to perform the activity or hold office no later than within 30 days of the date of his election or appointment or the approval of his mandate. (2) An official who, prior to taking office, was a member of bodies whose membership is incompatible with his office under this Act or is contrary to the preceding Article, shall immediately submit his resignation or make a request to have his membership terminated; the membership shall be terminated within 30 days of the date of his appointment to office.

Article 29

(Warning by the Commission and the consequences of a failure to comply)

(1) If an official does not cease to perform an activity, hold membership, or hold an office that is incompatible with his office under this Act within the time limit referred to in the preceding paragraph, the Commission shall warn the official and set the time limit by which the official must cease to perform the activity or hold office. The time limit set by the Commission may not be shorter than 15 days or longer than three months. The Commission shall warn the official who, after taking office, commences an activity, gains membership or takes an office which is incompatible with his office under this Act on incompatibility and shall set the time limit by which the official must eliminate the incompatibility in question. This time limit may not be shorter than 15 days or longer than three months.

(2) If the Commission establishes that the official continues to perform the activity, hold a membership, or hold an office after the time limit set by the Commission has expired, it shall inform the relevant authority competent to propose or commence a procedure for the removal of the official from office. The competent authority shall inform the Commission of its final decision.

(3) The provisions of the preceding paragraph do not apply to directly elected officials. If the Commission establishes that the facts referred to in the preceding paragraph in connection with directly elected officials are true then it shall inform the public of its findings and publish them on its website.

IPCA also defines fines for not obeying mentioned provisions:

- A fine of between EUR 400 and EUR 1 200 shall be imposed on an individual who
 - o fails to inform the Commission that he is carrying out a professional or other activity;
 - o fails to comply with the Commission's decision on the prohibition of the performance of an additional activity or with the conditions or restrictions imposed on him by the Commission's decision;
- A fine of between EUR 1 000 and EUR 2 000 shall be imposed on an individual who
 - o fails to cease to perform a professional or other activity after the decision made on revocation of the authorisation has become final;
 - o fails to cease to hold an incompatible office, perform an incompatible activity, or revoke his membership.

IPCA defines also restrictions of operations as follows:

Article 35

(Restrictions on business activities and the consequences of violations)

(1) A public sector body or organisation which is committed to conducting a public procurement procedure in accordance with the regulations on public procurement or which carries out the procedure for granting concessions or other forms of public-private partnership, may not order goods, services or construction works, enter into public-private partnerships or grant special and exclusive rights to entities in which the official who holds office in the body or organisation concerned or in cases where the official's family member has the following role:

- participating as a manager, management member or legal representative; or
- has more than a 5% level of participation in the founders' rights, management or capital, either by direct participation or through the participation of other legal persons.

(2) The prohibition referred to in the preceding paragraph shall also apply to the public sector body or organisation's business dealings with the official or the official's family member as a natural person.

(3) The prohibition of operation within the scope detailed in paragraph 1 and the preceding paragraph of this Article shall not apply to other procedures or ways of obtaining funds that are not covered in paragraph 1 of this Article, providing that the provisions of this or any other Act relating to conflicts of interest and the obligation to avoid any conflicts of interest are duly complied with, or that the official is consistently excluded from all stages of decision-making on the performance and entering into of procedures or transactions. If the official or the official's family member violates the provisions on the avoidance of conflicts of interest or exclusion, the consequences shall be the same as those specified for the prohibition of operation. (4) The prohibition of operation referred to in paragraph 1 of this Article and the prohibition referred to in the preceding paragraph shall also apply to smaller parts of a municipality (village, local and quarter communities), which have their own legal personality, if the municipal official is a member of the council of a smaller part of the municipality or if a particular transaction may be entered into only with the municipal official's consent.

(5) Officials shall communicate the name, registration number and head office of those entities with which they or their family members have a relationship, as specified in paragraph 1 of this Article, to the body in which they hold office within one month after taking office and then no later than within eight days of any change occurring. The body shall submit the list of entities referred to in the preceding sentence of this Article to the Commission no later than within 15 days of receipt of information on or a notification of changes regarding the entities. The Commission shall publish the list of entities referred to in the first sentence of this paragraph on its website every month.

(6) The restrictions under the provisions of this Article do not apply to operation on the basis of contracts concluded prior to the official taking office.

(7) A contract or other forms of obtaining funds that are in conflict with the provisions of this Article shall be null and void.

Article 36

(Temporary prohibition of operation after the termination of office)

(1) An official may not act as a representative of a business entity that has established or is about to establish business contacts with the body in which the official held office until two years have elapsed from the termination of his office.

(2) The body in which the official held office may not do business with the entity in which the former official has a 5% participation in the founders' rights, management or capital, either by direct participation or through the participation of other legal persons until one year has elapsed from the termination of the office.

(3) The body in which the official held office shall immediately, or within 30 days at the latest, inform the Commission of the situation referred to in paragraph 1 of this Article.

Besides contracts and other acts shall be null and void, IPCA also defines fines for not obeying mentioned provisions:

- A fine of between EUR 400 and EUR 1 200 shall be imposed on an individual who
 - o fails to provide to the body in which he holds office information details on the entities with which he or his family members have a relationship, as specified in paragraph 1 of Article 35 of this Act;
 - o within two years of the termination of the office in relation to the body in which he held office, acts as a representative of a legal person that has established or is about to establish business contacts with the aforementioned body, in contravention of the provision of paragraph 1 of Article 36 of this Act;
- A fine of between EUR 400 and EUR 4 000 shall be imposed on a responsible person of a body or organisation of the public sector or a smaller part of a municipality which acts in contravention of paragraphs 1, 2 or 4 of Article 35 of this Act, and on a responsible person of a body who fails to submit a list of the entities referred to in paragraph 5 of Article 35 of this Act to the Commission.
- A fine of between EUR 400 and EUR 4 000 shall be imposed on a responsible person of a body in which the official has held office which does business with the official's business entity in contravention of paragraph 2 of Article 36 of this Act.
- A fine of between EUR 400 and EUR 4 000 shall be imposed on a responsible person of a body in which the official has held office which, in contravention of paragraph 3 of Article 36 of this Act, fails to inform the Commission of conduct by an official that is contrary to paragraph 1 of Article 36 of this Act.

Verification / control regards conflict of interests / incompatibilities / restriction on operations:

The CPC may on its own motion, following a report submitted by any legal or natural person, or upon a request of certain state bodies, initiate proceedings relating, inter alia, to violations of the rules on conflicts of interest or restrictions on business and other activities. Such proceedings involve evaluation whether a person has failed to fulfil their obligation to submit a preliminary or ad hoc declaration.

Additionally, the truthfulness and legal relevance of ad hoc declarations is mandatorily subjected to examination by a head of the body or organization of public sector within which the reporting official person performs its public duties.

The investigative powers of the CPC are relatively broad. A finding that an official person has omitted their duty to declare private interest may be accompanied with decision that the person has acted in circumstances of conflict of interest or even that they acted corruptly. The investigation is conducted as a slightly modified administrative procedure. The CPC may request information and documentation from other bodies and organization of public sector and even from legal persons of private sector, as well as utilize the law enforcement bodies to gather relevant information.

In case of violations, the CPC may propose the discharge of the official person to their superseded and inform the public of its findings. Besides, the Commission can also issue fines for violating obligations under the IPCA, as already explained above.

Disciplinary offences

A civil servant (this term is narrower as "official person" as it does not include public officials and employees in state owned companies) may be subjected to one of the following disciplinary measures:

- an admonition;

- a fine which may amount up to 20-30 per cent of monthly salary, received in the month in which the serious violation was committed;
- divestment of, or dismissal from position;
- dismissal from title and appointment to a title one grade lower;
- cancellation of the contract of employment.

There is no explicit mention of an omission of declaration of interest among reasons to impose above stated measures. However, the Civil Servant Act permits such measure for any illegal conduct related to the performance of the public duties.

A judge may be subjected to one of the following disciplinary sanctions:

- a written admonition;
- suspension of promotions in forthcoming three years;
- reduction of salary up to 20% in the forthcoming year;
- relocation to a different court;
- dismissal from office.

Omissions of declaration of interest, both preliminary and ad hoc, are explicitly mentioned as a ground for imposing disciplinary sanction.

There are no disciplinary sanctions for high officials.

Statistical data:

a) Conflict of interests

Please find in the table below the number of cases in which the CPC investigated allegations that a person had failed to fulfil their duty to declare conflict of interest, together with the data on what was the outcome of the investigation. Please note that although these numbers are not limited to cases where the person under the investigation had the status of public official - we do not keep such a detailed statistics -the majority of the cases is related to such persons. Additionally, these statistics do not represent verification conducted in appeal procedures in concrete cases, nor do they represent supervisory/inspection procedures conducted by other state bodies (e.g. administrative inspection).

	2011	2012	2013	2014	2015	2016	2017
Number of cases (opened based on received report and on own motion)	NA	NA	109	105	86	83	101
Number of concluded cases	30	49	94	100	87	75	93
Number of cases with identified violations	3	15	21	15	8	12	16
Number of opened misdemeanour cases	NA	NA	17 misdemeanour acts with decisions (payment order) 2 reprimands,	19 misdemeanour acts with decisions 1 written warning	6 misdemeanour acts with decisions 2 written warnings, 1 payment order	16 misdemeanour acts with decisions 6 reprimands, 4 written warnings,	10 misdemeanour acts with decisions

			1 written warning		1 official notice of not issuing a written decision	9 payment order	3 reprimands 6 payment order 9 written warnings
Number of written opinions regards Col	136	106	118	94	164	125	140

Cases where CPC found violations (please see above mentioned statistics) were not made public. The only case which was in public (a case against economy minister whose company received funds from his ministry and who acted very transparent and who excluded himself from all activities connected with his subject), was made due to the fact media sent question to CPC

However, according to adopted Guidelines for dealing with Conflict of Interests cases from 28.3.2013, CPC informs public about statistics and work regards Col (but without concrete names) quarterly (on every fourth month, for previous 4 months of work)) on its web-page. Such information / report consists of following information:

- provisions of IPCA and work method regards Col;
- how many cases CPC analysed in previous 4 months;
- what were the results of analysis (how many violations, how many referrals to other bodies, how many dismissals, etc.);
- description of cases (anonymised) where violations were identified;
- analysis of dismissals of cases (reasons for dismissals - not regards concrete substance, but which reason CPC used (e.g. no substance of violation; cases were already analysed in the past; CPC was not competent for the allegation; criticisms; implausible allegation; etc.);
- information on possible misdemeanour procedures and what were the outcomes with this regard;
- information on issued legal opinions.

b) Incompatibilities of functions

Please find in the table below the number of cases in which the CPC investigated allegations that a person had failed to fulfil their duties regards incompatibilities:

	2013	2014	2015	2016	2017
Number of cases (opened based on received report and on own motion)	22	6	12	33	17
Number of concluded cases	18	6	12	25	13
Number of cases with identified violations	8	2	4	11	0
Number of opened	0	0	4 misdemeanour acts	6 misdemeanour acts with	6 misdemeanour acts with

misdemeanour cases			with decisions: 4 written warnings	decisions: 4 written warnings, 2 payment order	decisions:
Number of written opinions regards Col	73	132	58	36	31

c) Restrictions of operation

Please find in the table below the number of cases in which the CPC investigated allegations that a person had failed to fulfil their duties regards restrictions of operations

	2013	2014	2015	2016	2017
Number of cases (opened based on received report and on own motion)	127	28	39	48	8
Number of concluded cases	119	28	39	40	23
Number of cases with identified violations	68	5	11	20	11
Number of opened misdemeanour cases	59 cases: 9 payment order (from 400 – 8800 EUR), 41 written warnings,	3 misdemeanour acts with decisions 1 written warnings	7 misdemeanour acts with decisions 3 written warnings	17 misdemeanour acts with decisions: 12 written warnings, 5 payment order	2 misdemeanour acts
Number of written opinions regards Col	153	124	57	36	24

Description of training or advisory services to public officials regarding Col regulations:

Statistics regarding the number of public officials that have participated in general anti-corruption and integrity training is already given under Article 5, Paragraph 2 (point 2 and 3).

Regarding CPs obligation to provide advices (written »legal« opinions / answers) on strengthening integrity and preventing and eliminating the risks of corruption in the public and private sectors, we gathered and prepared following statistics:

	2012	2013	2014	2015	2016	2017	TOTAL
Number of written opinions regards Col	106	118	94	164	120	140	742
Number of written opinions regards Gifts	14	13	11	11	8	4	61
Number of written opinions regards Incompatibilities of functions	82	73	132	58	36	31	412
Number of written opinions regards restrictions of business activities	153	73	124	57	36	24	467

With such provided opinions and advices CPC work in proactive way with the aim to prevent possible occurrence of corruption and other illegal behaviours and to advice persons how to act in different situations.

Having in mind that the CPC is the main body in Slovenia regards prevention of corruption, the CPC also published (and issued its own) publications with the aim to inform public about corruption and anti- corruption issues. Publications are available on following web pages:

- <<https://www.kpk-rs.si/sl/korupcija-integriteta-in-etika/publikacije-in-multimedija/55>>

- <<https://www.kpk-rs.si/sl/korupcija-integriteta-in-etika/publikacije-in-multimedija/multimedija>> -
<[https://www.kpk-rs.si/upload/datoteke/Zbornik_Javna_etika_in_integriteta_odgovornost_za_skupne_vrednote.pdf\(1\).pdf](https://www.kpk-rs.si/upload/datoteke/Zbornik_Javna_etika_in_integriteta_odgovornost_za_skupne_vrednote.pdf(1).pdf)>

- etc.

ARTICLE 8, PARAGRAPH 5

1. Please describe (cite and summarize) the measures your country has taken, if any, (or is planning to take, together with the related envisaged time frame) to ensure full compliance with article 8 (5) of the Convention, and in particular to establish measures and systems requiring public officials to make declarations to appropriate authorities regarding, inter alia, their outside activities, employment, investments, assets and substantial gifts or benefits from which a conflict of interest may result with respect to their functions as public officials.

2. Please outline the actions required to ensure or improve the implementation of the measures described above and any specific challenges you might be facing in this respect.

Rules and obligations regards assets declaration system in the Republic Slovenia are defined with Integrity and the Prevention of Corruption Act (hereinafter IPCA) which was adopted in 2010. Please see attached law in english. The Comission for the prevention of corruption of the Republic of Slovenia is responsible institution for implementation and monitoring (and issuing sanctions) of this act.

Oversight of the assets of persons under obligation is one of the basic conditions of transparency and trust in public offices, so it represents an inseparable part of the integrity of the public sector. Monitoring and overseeing assets serve to promote and enhance transparency in processes and procedures of exercising executive power, in performing public offices and in managing public affairs. With such we can also identify illicit enrichments, incompatibilities of functions, conflict of interests, etc.

The Commission which is responsible institution for collecting and analysing assets and interest declarations, uses data from declarations and performs different proactive analysis with the aim to identify possible violations.

a) Persons with obligation to declare assets (Article 41 IPCA):

Section V of the IPCA regulates control over the assets of persons under obligation, who are defined as professional officials, non-professional mayors and deputy mayors, high-ranking civil servants (director generals, secretary generals of ministries, heads of constituent ministerial bodies, heads of government departments, heads of administrative units, directors and secretaries of municipal administrations), managers (directors and members of collective management bodies of public agencies, public funds, public institutes, public commercial institutes and other entities of public law that are indirect users of the national budget or self-governing local community budgets and public enterprises and commercial companies in which the State or a self-governing local community holds a majority interest and dominant influence), persons responsible for public procurement (which includes persons that in accordance with this definition participate in public procurement and are not employed by the contracting authority), civil servants of the National Review Commission for Reviewing Public Procurement Award Procedures, citizens of the Republic of Slovenia who hold office in EU institutions, other EU bodies and other international institutions to which they have been appointed or elected on the basis of secondment or a proposal from the Government of the Republic of Slovenia or the National Assembly and whose obligation to declare their assets is not otherwise regulated by the documents of EU institutions, EU bodies and other international institutions for which they perform duties of the office.

In this regard the IPCA regulates precisely the duty to report assets, which data is classed as data on assets, the time for reporting data to the CPC and changes to data, and it also defines the procedure in the event of the CPC determining that since the last reporting the assets of an official have grown disproportionately, while it also lays down generally the public nature of officials' assets and exceptions to this rule. Since 1 July 2011, it has been obligatory to report data on assets using the e-form accessible on the CPC website.

Regarding the obligation of declaring the assets by family members of persons under the obligation: generally they don't have to declare their assets, but as provided by the fifth paragraph of Article 43 of the IPCA, if on the basis of a comparison between the information provided in asset declaration and the actual situation it is reasonable to infer that the person under obligation is transferring their property or income to family members for

the purpose of evading supervision under IPCA, the CPC may request that they submit the data on assets and incomes within one month of receiving the request.

The number of persons with obligation to declare assets throughout the years:

Year	2011	2012	2013	2014	2015	2016
Number of persons obliged to submit data on their assets	between 10.000 and 13.000*	between 10.000 and 12.000*	between 10.000 and 12.000*	between 10.000 and 12.000*	13.976	14.627

b) Information that must be declared (Article 42 IPCA):

Data on assets of a person with obligations shall include the following:

- personal name;
- personal registration number (EMSO);
- address of permanent residence;
- tax ID number;
- information on the office or work;
- information on the work performed immediately before taking office;
- any other office held or activities performed;
- information on ownership or stakes, shares, management rights in a company, private institute or any other private activity with a description of the activity, and a designation of the registered name or the name of the organisation;
- information on stakes, shares, and rights that the entities referred to in the preceding indent have in another company, institute or private activity with the designation of the registered name or the name of the organisation (hereinafter: indirect ownership);
- information on taxable income under the law governing personal income tax that is not exempt from personal income tax;
- information on immovable property with all the land register information on land plots;
- monetary assets deposited in banks, savings banks and savings and loan undertakings, the total value of which in an individual account exceeds EUR 10 000;
- the total value of cash if it exceeds EUR 10 000;
- types and values of securities if, at the time of the declaration of assets, their total value exceeded EUR 10 000;
- debts, obligations or assumed guarantees and loans given, the value of which exceeds EUR 10 000;
- movable property, the value of which exceeds EUR 10 000; and
- any other information in relation to assets that the person with obligations wishes to provide.

c) Frequency of declarations required:

The IPCA lays down the obligation both for a) persons under obligation reporting their assets and for b) bodies employing persons under obligation and contracting authorities, which are to submit lists of such persons to the CPC.

List of persons under obligation must be submitted to the CPC by bodies at which such persons are employed, contracting authorities operating under the regulations governing public procurement, the Government and National Assembly for Slovenian citizens who hold office in EU institutions or other bodies or other international bodies and were appointed or elected on the basis of the secondment or proposal of the Government or the National Assembly. Lists of persons under obligation must be kept up to date. Any change must be reported to the CPC within 30 days (para. 5 of Article 41 of the IPCA). These lists must contain the personal name, permanent residence address, national ID number and tax number of the person under obligation, their office or position and the date of taking up their duties and the date of the termination of office or position. The exception to this is reporting lists of persons responsible for public procurement.

Persons under obligation (with the exception of persons responsible for public procurement and officials of the National Review Commission) report information on their assets in their entirety to the CPC immediately or within one month of taking up or ceasing to hold office or perform work, and one year after ceasing to hold office or perform work (para. 2 of Article 41 of the IPCA). Any change to the assets above that exceeds EUR 10,000 has to be reported by 31st January of the current year for the previous year (para. 2 of Article 43 IPCA). The Commission may at any time request the person with obligations to submit the data referred to in Article 42 of the IPCA - the person shall submit this data by no longer than within 15 days of receipt of the request (para. 4 of Article 43 of the IPCA).

d) Submission of declaration:

In February 2012 an online declaration system was introduced and all persons under the obligation are required to submit their declarations in the new system (e-forms) and also send a signed paper format to CPC. Special guideline is available for officials for filling out forms, besides the Commission's staff is always available for assistance (via phone, e-mails, in person). As regards giving advices to officials in general sense (conflict of interests, incompatibilities) is the same - CPC's staff is available for that too. Besides, the CPC issues lots of publications and advices - please see information provided under Article 5, Paragraph 2 and Article 8, Paragraph 4.

e) Public availability of asset declarations:

Publication of the declarations: the IPCA stipulates that the data on the income and assets of the persons with obligations, with the exception of persons responsible for public procurement and civil servants of the National Review Commission, shall be publicly available in the part relating to income and assets obtained during the period of holding a public office or performing an activity and within one year after the termination of the office or activity, irrespective of the restrictions stipulated in the law governing the protection of personal information and the law governing the protection of confidential tax information. The data shall be made publicly available for 24 months after the date of the termination of the office or work. (para. 1 of Article 46 of the IPCA)

On its website, the CPC shall publish data on income and assets obtained during the period of holding a public office or performance of an activity and within one year after the termination of the office or activity; the data shall include the following:

- the personal name and office of the person with obligations;
- the ownership or stakes and the number of shares and rights in a company, institute or private activity with the designation of the registered name or the name of the organisation;
- the ownership or stakes, shares and management rights in a company, private institute or any other private

- activity with the designation of the registered name or the name of the organisation;
- the number and value of immovable properties without land registry information on land plots;
- the total value of monetary assets deposited in banks, savings banks and savings and loan undertakings if this exceeds EUR 10 000 in value;
- the total value of cash if this exceeds EUR 10 000 in value;
- the total value of securities if this exceeds EUR 10 000 in value;
- the total value of debts, obligations or guarantees assumed if this exceeds EUR 10 000 in value;
- the total value of loans given if this exceeds EUR 10 000 in value; and
- movable property, the value of which exceeds EUR 10 000, in a manner that does not allow for the property's identification. (para. 2 of Article 46 of the IPCA)

The data referred to in the preceding paragraph shall be published in a manner that facilitates a comparison of the data. (para. 3 of Article 46 of the IPCA)

In reality, the income and assets are not made publicly available since the CPC established when supervising the implementation of the provisions regarding obligation to declare income and assets that in 60% of cases these the declaration forms are filled out in a wrong manner (some assets are not reported, assets of family members are reported while they shouldn't be and as a consequence shouldn't be made publicly available).

f) Mechanism of monitoring the asset declaration:

The CPC is the responsible body for the implementation and supervision of the implementation of the provisions of this Act (Article 80 of the IPCA). Therefore, the CPC is responsible for reviewing, verifying or otherwise checking whether the information in the declaration forms is complete and accurate. Information shall be communicated to the CPC by way of an electronic form.

The CPC may obtain any information referred to in the declaration of assets that can be obtained from the official records to verify the accuracy of the statements of the person with obligations (cross-check analysis). If the CPC finds any inconsistencies between the information referred to in the declaration of assets and other information, it may request the person with obligations to enclose relevant evidence with the information (Paragraphs 2 and 3 of Article 42 of the IPCA).

The CPC is responsible for reviewing the accuracy of asset declarations and currently employs 2 persons for this purpose. Given the great number of declarations received, the CPC uses a combination of random checks and the selection of a different group of target officials each year, which are checked more thoroughly. Asset declaration falls under the punctuality check, but not all persons under obligation of asset declaration are checked through the random checks and the targeted check (in these checks the completion and accuracy is checked). In complete check following methods are used: cross-check with external databases, comparisons across years, identification of possible incompatible functions and conflict of interest, internal consistency...).

Unfortunately Commission does not have special automated system which could provide cross-check analysis in real time in one place (with one click). This is future plan for the CPC. Currently CPC has:

- automated check of in-time reporting (if officials declared assets or not),
- online access to majority of external databases (data on aircrafts, vehicles, weapons, shares, Real estate ownerships, Register of companies),
- the CPC can receive bank details, records on animals, land registers, investment funds, stock exchanges, boats on demand.

See number of checks:

Year	2012	2013	2014	2015	2016
Number of checks	50*	9*	37*	103*	28*

*Each check includes more than one person. For example the total number of persons under check in 2016, includes controls upon 980 persons under obligation.

Additional information on illicit enrichments:

If during an investigation, the CPC determines that there has been a disproportionate growth of one's assets, it notifies the state prosecutor's office which is responsible to initiate the procedure of confiscation of illicit assets. Note, however, that such a procedure can be imposed only on a person indicted in a criminal procedure or on persons that have obtained the alleged illicit asset from the indicted person.

Please note also that our legal system provides for three procedures regarding illegal enrichment:

- The first one is actually a part of criminal procedure; if a court determines that the convicted person obtained assets from a criminal act, such assets are confiscated. As we believe that this procedure is not of your interest, it will be omitted in this questionnaire;
- The second procedure is conducted by the CPC, whereby the CPC investigates whether the increase in one's assets was disproportionate to their incomes. If such a growth is ascertained during the procedure, the CPC may publish its findings, but it cannot confiscate the illegally obtained assets. The aim of such procedures is mainly to raise transparency and to promote political accountability and the integrity of public sector.
- The third procedure is conducted as litigation in front of a civil court of law in which the public prosecutor files a lawsuit against an individual who has to prove that their assets were obtained in a legal way. If the defendant does not succeed, the assets are confiscated. Such procedure may be held only against a person who was indicted in a criminal procedure, however, there is no need that the person is convicted in order for the prosecutor to succeed. The prosecutor may file the lawsuit after receiving a notification from the CPC that a case of disproportionate growth of one's assets was ascertained.

In the past five years, the CPC has conducted 6 cases of disproportionate growth. Two cases have become final with the outcome of the defendant's assets being confiscated the courts of law.

Even though there very few cases where illegal enrichment was ascertained in practice, it is undeniable that the asset declaration system was a cornerstone in these cases. Therefore it is safe to claim that our legal system enables the monitoring of public officials' wealth to a certain extent, and facilitates identification and prosecution of illicit enrichment.

g) Accountability and enforcement mechanisms

A person under the obligation to declare assets is liable for the offence if he/she fails to provide the necessary data or provides false data in the declaration of assets or its supplements. If on the basis of data on assets or other information, the CPC finds that, since the last declaration, the assets of the person with obligations have increased disproportionately compared to his income derived from the performance of his duties of office or an activity in accordance with the provisions and restrictions laid down in the IPCA and other acts, or that the value of the person's actual assets, which is the basis for the assessment of tax liabilities, considerably exceeds the

declared value of the person's assets, it shall invite the person with obligations to explain the increase in assets or the difference between the actual value and the declared value of assets by no later than within 15 days. If the person with obligations fails to explain the increase in assets or the difference between the actual value and the declared value of assets, or fails to do so in a comprehensible manner, the CPC shall notify the body in which the person concerned holds office or the body responsible for the election or appointment of the person concerned, and, in the event of a suspicion held that other violations are being committed, it shall also notify other competent authorities (Paragraphs 1 and 2 of Article 45 of the Integrity and Prevention of Corruption Act).

If the CPC finds that the person with obligations has not provided data on his office, activities, assets and income in accordance with the IPCA, it shall invite the responsible person to submit the data required within a time limit that may not be shorter than 15 days or longer than 30 days in duration. If the person with obligations fails to submit the required data within this time limit, the CPC shall decide that this person's salary or salary compensation should be reduced by ten percent of his basic salary each month after the expiry of the time limit, but to no less than the minimum salary level. This decision shall be implemented by the employer (Paragraphs 1 and 2 of Article 44 of the IPCA).

Liability for offence:

A fine of between EUR 400 and EUR 1,200 shall be imposed on an individual who:

- fails to communicate information on his assets to the Commission,
- fails to provide the necessary data, or provides false data, in the declaration of assets referred to in Articles 42 and 43 of the Integrity and Prevention of Corruption Act or its supplements.

Administrative measures based on a previously conducted procedure to decide in an administrative matter pursuant to the act governing general administrative procedure, as follows:

- a decision reducing the salary or compensation of a person under obligation for refusing to report information on offices, activities, assets and income in compliance with the law (Article 44 of the IPCA).

Number of minor offence decisions in regards failing to comply with obligation to disclose, for disclosing incomplete or inaccurate information:

Year	2012	2013	2014	2015	2016
Number of minor offence decisions					
failure to disclose	2	44	6	24	262
disclosing incomplete or inaccurate information	1	8	3	6	3
failure to submit a list of persons with obligations to the CPC	/	2 /	/	/	/
Number of warnings					
failure to disclose	/	3	14	9	79
disclosing incomplete or inaccurate information	/	1 /		3	24
failure to submit a list of persons with obligations to the CPC	/	/	/	/	/

h) Providing advisory services/advice on asset declaration

Persons under the obligation to declare assets can obtain advice on rules and on the expected conduct by requesting CPC to issue legal opinion and by contacting CPC via telephone in business hours (every Tuesday and Thursday). Opinions of CPC are also available on CPCs' web site. Persons are also able to educate themselves by attending CPCs' lectures, given for the specific needs of state bodies, if requested and by general

lectures on IPCA, that are given at least two times every year by the CPC employees.

i) The number of employees at CPC

Currently 2 persons are employed for reviewing, verifying or otherwise checking declaration forms and the data they contain. They are also the ones responsible for conducting ad hoc checks upon the decision of the CPC.

Statistics regards Assets declarations:

Most common irregularities detected with regard to filing asset declaration forms are the following:

- wrong electronic forms are used or the data is provided without using the electronic format;
- incorrect and/or incomplete data provided in electronic forms;
- yearly reporting on all assets and not merely on changes on assets; - providing incorrect dates of taking and leaving office;
- filling out forms for registering or cancellation of a person obliged to report on assets under paragraph 5 of Article 41 of the IPCA that should be done by a state body and not the person itself;
- late submission or lack of submission of asset declaration forms.

In year 2017 CPC prepared statistics regarding the compliance rate for filing, irregularities detected in asset declarations for persons on top executive functions for the last 5 years. The statistics showed:

Mandate 10.2.2012-20.3.2013

ALL VIOLATIONS IN TOTAL	28
ALL DECLARATION FORMS IN TOTAL	120
ALL VIOLATIONS IN TOTAL ACCORDING TO THE PUBLICLY ACCESSIBLE** DATA IN %	23,33%

Mandate 20.3.2013-18.9.2014

ALL VIOLATIONS IN TOTAL	33
ALL DECLARATION FORMS IN TOTAL	153
ALL VIOLATIONS IN TOTAL ACCORDING TO THE PUBLICLY ACCESSIBLE** DATA IN %	21,57%

Ongoing mandate 18.9.2014-

ALL VIOLATIONS IN TOTAL	25
ALL DECLARATION FORMS IN TOTAL	150
ALL VIOLATIONS IN TOTAL ACCORDING TO THE PUBLICLY ACCESSIBLE** DATA IN %	16,67%

A concrete example of reviewing the information provided by the persons obliged to submit data on their assets: In 2012 the CPC conducted an ad hoc procedure for reviewing data submitted in their asset declaration forms by heads of parliamentary groups. The process was concluded in the beginning of 2013 and with regard to the above mentioned heads of parliamentary groups a need to conduct hearings before the senate of the CPC was identified in two cases. None of them provided sufficient additional clarification or responded to a sufficient manner with regard to the allegations of reporting violations with regard to their assets presented by the CPC. During the ad hoc procedure the CPC also identified situations with corruption risks. After the CPC issued a final report both persons started an administrative dispute and used other possible legal remedies. Currently the cases are being adjudicated before the Administrative Court.

RECEIVING GIFTS:

Article 30 of the IPCA provides that an official may not accept gifts or other benefits in connection with the discharge of the duties of the office, the exceptions being protocol gifts and occasional gifts which are small in value. The act goes on to define protocol and occasional gifts. Protocol gifts are gifts given to officials by representatives of other State bodies, other countries and international organisations and institutions on the occasions of visits, guest appearances and other occasions, and other gifts given in similar circumstances. Occasional gifts of small value are gifts given on special occasions that do not exceed EUR 75 in value, and a total value that does not exceed EUR 150 during a particular year when they are received from the same person. Under Article 31 of the IPCA, protocol gifts and occasional gifts with a value greater than EUR 75 become the property of the Republic of Slovenia, local community or organisation in which the official holds office.

The method of disposing of gifts and the keeping and content of the list of gifts are set out in the Rules on restrictions and duties of officials related to accepting gifts (Official Gazette of the Republic of Slovenia, No. 53/10, 73/10, hereinafter: the Rules). Under Article 4 of the Rules, in addition to information about the official, date of receipt of gift and title of gift giver, the information to be entered on the form must include the type and value of the gift, an indication whether it is a protocol or occasional gift, and an indication whether the gift has become the property of the official, the State or the local community, or the body in which the official holds office. Article 5 of the Rules defines the method of determining the value of a gift. Under that article the value of a gift for which the market value cannot be determined is appraised through the non-expert assessment of the official, while if the gift is of artistic or historical value, its value is determined by expert appraisal.

With the analogous application of Articles 4 and 5 of the Rules, determining the value of gifts received is important both for protocol and occasional gifts, while for both categories a limit of EUR 75 is set, beyond which the gift becomes the property of the State, the local community or the body in which the official holds office. Nevertheless the CPC believes that for gifts given to the State, the local community or the body in which the official holds office, and for gifts which the official hands over to the State, municipality or body, the entry or determination of value is not essential to achieving the aims pursued by the aforementioned provisions of the IPCA and the Rules. Where it involves a protocol gift for which a lay assessment cannot determine its value, or a gift of artistic or historical value, where the appraisal of value requires the hiring of an expert and thereby a certain cost, while the gift is given over to public ownership in one way or another, for reasons of expediency the CPC will allow a statement to be made on the form that the value cannot be determined by non-expert appraisal and that if necessary, it may be determined later through the hiring of an appropriate expert.

In 2002 the Civil Servants Act (CSA) was adopted, establishing the obligatory standards of conduct for all civil servants and provides the legal foundation for the Decree on the limitations and duties imposed upon public servants with respect to receiving gifts, adopted in 2003. CSA in Article 100 defines activities and work that is not compatible with the work of civil servants and public officials and also defines the sanctions for breaking this rules. The article 100 CSA defines that officials may not perform other activities, if the activity violates the prohibition of competition or the competition clause pursuant to the law governing employment; if the performance of activity might affect the impartiality of the performance of work; if the performance of activity might result in the abuse of data accessible at the performance of the tasks at work, that are not accessible to the public and if the performance of activity is harmful to the reputation of the body. The restrictions under this Article shall not apply to activities relating to scientific and educational work, work in associations and organisations in the field of culture, art, sport, humanitarian activities and other similar associations and organisations, work in the area of journalism, and to membership and activities in political parties.

Officials holding the positions of director-general, secretary-general, the principal of Body within Ministry, the principal of a Government Office, the principal of Administrative Unit and the director of municipal administration (municipal secretary), may not perform any profitable activities with the exception of activities in the field of science, research, education, art, journalism and culture. Legal entities in which officials

under the preceding paragraph, or their spouses, their lineal relatives or their collateral relatives three times removed, hold a share exceeding 20 per cent, may not enter business relations with bodies in which officials work. Contracts concluded contrary to the provision of this Article shall be null and void.

Official that believes a situation has arisen in which his personal interests might affect the impartiality and objectivity of the performance of his tasks, or where the circumstances of the situation might cast doubt as to his impartiality and objectivity, must, immediately or as soon as practical under the circumstances, notify the principal and act in accordance with his instructions. In such cases, the principal must assure that the tasks are performed lawfully, impartially and objectively, or must verify that the tasks were performed in such a manner.

Statistics regards receiving gifts:

	2012	2013	2014	2015	2016
Received signal / report and opened cases on self initiation	/	3	2	/	1
Identified violations	/	/	/	/	/
Number of issued advices	14	13	11	11	8

As regards civil servants:

The Ministry for public Administration does not process records about the number of cases in which the public servants were advised about the proper managing the potential or actual conflicts of interests. Usually the state or local authority seeks for advice when the certain situation occurs and the answer is then published at the web site of the Ministry for Public Administration.

Should you need additional clarification or information please contact us. The contact person of the Commission is: Mr. Jure Škrbec, Ph.D., Senior European and International Relations Officer, E-mail: jure.skrbec@kpk-rs.si.

With best regards,

Boris Štefanec
CHIEF COMMISSIONER

Sent to:

- addressee
- archives.