

Annex: Checklist - relevant topics for your contribution

I. Justice System

A. Independence

Relevant topics to be covered in your contribution include:

1. Appointment and selection of judges¹, prosecutors and court presidents (incl. judicial review)

➤ JUDICIAL SERVICE

Since the 2025 Rule of Law Report, the restructuring of the highest level of the judiciary has been completed through constitutional and legislative amendments. The reform introduced a clear institutional separation between constitutional and administrative justice, on the one hand, and civil and criminal justice, on the other.

The Twenty-First Amendment to the Constitution (Law No. 130(I)/2025) introduced a comprehensive reorganisation of the judicial system through amendments to Articles 135, 136, 146, 152 and 155 of the Constitution. The Amendment expressly established the Supreme Constitutional Judicial Council, composed exclusively of the President and judges of the Supreme Constitutional Court, and entrusted it with exclusive constitutional competence for the appointment, promotion, transfer, termination of service and disciplinary control of judges of the administrative jurisdiction, including judges of the Administrative Court of Appeal.

The amendment of Article 146 expressly provided for the establishment of an Administrative Court of Appeal. The Court is positioned between the first-instance administrative courts and the Supreme Constitutional Court, thereby completing a three-tier structure of administrative judicial review. The Administrative Court of Appeal was granted exclusive competence to hear appeals against decisions of administrative courts, while the Supreme Constitutional Court examines such cases only following a referral. New constitutional provisions further introduced explicit guarantees that a special law regulates the establishment, jurisdiction, powers and remuneration of judges, and prohibit any adverse alteration of these conditions after appointment.

Law No. 141(I)/2025 revised the Administration of Justice Law (Law No. 33/1964) in order to implement the new constitutional framework. The law established the Administrative Court of Appeal, with its seat in Nicosia, composed of up to six judges appointed by the Supreme Constitutional Judicial Council. Appointment requires a minimum of twelve years of legal experience and demonstrated specialisation in public law. The law also introduced a dual system of Supreme Judicial Councils, with a judicial majority and mechanisms of mutual annulment review.

Further legislative amendments adopted in 2025 aligned the Administrative Court and the International Protection Administrative Court with the new structure. Supervisory competences over administrative judges were transferred to the Supreme Constitutional Judicial Council and their previous alignment with district judges was discontinued. The amendments also introduced the possibility of temporary appointments in cases of incapacity, absence or increased workload. As a result, administrative courts are fully integrated into a distinct administrative judicial branch, with appeals lying before the Administrative Court of Appeal.

¹ The reference to 'judges' concerns judges at all level and types of courts as well as judges at constitutional courts.

In parallel, the procedural framework governing judicial appointments was further refined through complementary regulatory instruments adopted within the constitutional remit of the competent judicial authorities.

The Regulation on the Advisory Judicial Council (*Procedure for the Appointment of Members of the Supreme Court*) clarified the internal functioning of the Council when convened for appointments to the Supreme Court. It regulates composition, presiding arrangements, quorum, deliberations, voting procedures and record-keeping, and introduced a formalised and public call for expressions of interest. Calls are published in the Official Gazette and on the website of the Supreme Court and are communicated to the Cyprus Bar Association and the Law Office of the Republic.

In September 2025, the Operating Regulations of the *Advisory Judicial Council of the Supreme Constitutional Court* were adopted pursuant to Article 4(4)(e) of the Administration of Justice (Miscellaneous Provisions) Laws (1964–2025). The Regulations codify the internal procedures applicable when the Council exercises its advisory role in appointment matters falling within the constitutional competence of the Supreme Constitutional Court.

Overall, these developments enhance procedural clarity, transparency and predictability in judicial appointment processes, while preserving the constitutional allocation of powers and the advisory nature of the Council's role.

2. Irremovability of judges; including transfers (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

➤ JUDICIAL SERVICE

Following the adoption of Law No. 145(I)/2022, non-judicial actors were allowed to participate, without voting rights, in meetings of the Supreme Judicial Council concerning the appointment and promotion of judges. These include the Attorney General, the President of the Cyprus Bar Association, and two lawyers of recognised standing and senior professional experience, nominated by the Cyprus Bar Association and approved by the Supreme Court. Their participation is strictly advisory and does not extend to decision-making (see our contribution to the 2025 Rule of Law Report).

Following the Twenty-First Amendment to the Constitution (Law No. 130(I)/2025) and the related amending Law No. 141(I)/2025, competences concerning the appointment, promotion, transfer and disciplinary supervision of judges were redistributed between two supreme judicial councils, reflecting the institutional separation between the civil and criminal jurisdiction and the administrative jurisdiction.

The *Supreme Constitutional Judicial Council (SCJC)*, composed of the President and judges of the Supreme Constitutional Court, is responsible for judges of the administrative jurisdiction, including the Administrative Court of Appeal, the Administrative Court and the International Protection Administrative Court.

The *Supreme Judicial Council (SJC)*, composed of the President and judges of the Supreme Court, is responsible for judges of the civil and criminal jurisdiction, including the District Courts, the Court of Appeal, the Assize Courts, the Family Courts, the Industrial Disputes Courts, the Rent Control Courts and the Military Court.

When the Councils meet to decide on appointments or promotions, non-judicial members participate without voting rights. When the councils decide on transfers or exercise disciplinary powers, they sit exclusively in judicial composition.

Decisions on transfers and disciplinary matters are subject to annulment review by the other Supreme Court, acting as a second-instance judicial body. Such review is limited to legality and the sufficiency of reasoning and does not extend to the merits. This mechanism provides judicial oversight of decisions affecting the irremovability of judges.

This review mechanism was applied in practice in *Decision No. 1/2025 of the Supreme Constitutional Judicial Council* (2 September 2025), concerning an objection against a transfer decision of the Supreme Judicial Council. Acting as an annulment body, the Supreme Constitutional Judicial Council reviewed the contested decision exclusively as regards legality and the sufficiency of reasoning. It confirmed that transfers without the consent of the judge may be compatible with the principle of irremovability where they are justified by objective service needs and are subject to independent judicial review, in line with European standards (*European Charter on the Statute for Judges*; CM/Rec (2010)12; CJEU, Case C-487/19; ECtHR, *Bilgen v. Turkey*).

3. Promotion of judges and prosecutors (incl. judicial review)

➤ JUDICIAL SERVICE

As described in our Contribution to the 2025 Rule of Law Report, reports prepared by the Administrative Presidents of the courts play a central role in promotion procedures. The reports assess the efficiency, quality and timeliness of judicial decisions, the clarity and consistency of legal reasoning, professional conduct and case management.

Candidates are assessed in accordance with the Regulation on Procedure and Criteria of the Supreme Judicial Council. Following the 2025 reform, the same framework applies to the Supreme Constitutional Judicial Council with regard to judges of the administrative jurisdiction. The promotion procedure includes two successive interviews.

The first interview focuses on personal qualities, legal knowledge, analytical capacity, breadth of thinking and the ability to perform effectively under pressure. Candidates who obtain an absolute majority of votes are included in the list of most suitable candidates and proceed to the second interview. The second interview assesses analytical legal reasoning, knowledge of case law, independence and openness of mind, communication and organisational skills, ability to cooperate, respect for differing views and technological competence. Minutes of the interviews include detailed reasoning.

Promotions are decided by an absolute majority of the members of the competent council. Decisions of the Supreme Judicial Council and the Supreme Constitutional Judicial Council are subject to annulment review by the other supreme court, acting as a second-instance judicial body, in accordance with Article 10(5)(z) of the Administration of Justice Law (Law No. 33/1964), read in conjunction with Article 146 of the Constitution. Judicial review is limited to legality and the sufficiency of reasoning and does not extend to the merits.

4. Allocation of cases in courts

➤ JUDICIAL SERVICE

In September 2025, the Supreme Constitutional Court adopted the Procedural Regulation on the Operation of the Supreme Constitutional Court (Review Jurisdiction – Transitional Provisions).

The Regulation was adopted pursuant to Article 135 of the Constitution and the Administration of Justice (Miscellaneous Provisions) Laws (1964–2025).

The Regulation governs the procedural handling of appeals examined under the transitional provisions introduced by the 2022–2025 judicial reforms. It provides that, for such appeals, the procedural rules applicable to the Administrative Court of Appeal apply *mutatis mutandis*. It further empowers the Supreme Constitutional Court, acting either *ex officio* or upon request, to issue procedural directions necessary for the orderly conduct of proceedings.

The Regulation aims to ensure procedural continuity and legal certainty during the transitional phase following the restructuring of the system of judicial review.

5. *Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary)*

➤ **JUDICIAL SERVICE**

In 2025, the ethical framework applicable to judges was further consolidated through the continued application of the *Guide to Judicial Conduct*, adopted by the Supreme Constitutional Court. The Guide is based on the Bangalore Principles of Judicial Conduct and relevant European standards and provides guidance on judicial independence, impartiality, integrity, propriety, equality, diligence and competence.

The Guide includes specific guidance on conflicts of interest, recusal, relations with lawyers, public statements, political activity and the use of social media. It applies to judges of the Supreme Constitutional Court, the Administrative Court of Appeal and the administrative courts.

The Guide supports a common and coherent understanding of ethical standards applicable to the exercise of judicial functions. Its application is without prejudice to the constitutional guarantees governing judicial independence and the institutional competences of the bodies responsible for judicial governance.

6. *Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)*

➤ **JUDICIAL SERVICE**

In November 2025, the Supreme Constitutional Court adopted Judicial Practice No. 13, strengthening safeguards for judicial impartiality by introducing clear rules on judicial abstention in cases involving close family or professional links between judges and lawyers appearing before the courts. The Practice aims to prevent both actual and perceived bias and aligns with European standards on objective judicial impartiality.

In addition, in 2025, a *Procedural Regulation on the Exercise of Disciplinary Powers* was adopted by the Supreme Constitutional Court, pursuant to Article 135A of the Constitution and the relevant provisions of the Administration of Justice Laws. The Regulation establishes a detailed and transparent framework governing disciplinary proceedings concerning judicial officers of the Administrative Courts and the Administrative Court of Appeal, while ensuring full respect for judicial independence and due process.

The Regulation provides for a multi-stage disciplinary procedure, including a preliminary examination phase during which the judicial officer concerned is informed of the allegations and afforded the opportunity to submit observations. Where justified, an independent Investigating Judge is appointed, subject to strict rules on the separation of functions, and conducts the investigation with full disclosure of evidence and respect for the right to be heard. Disciplinary proceedings are judicial in nature, adversarial, and conducted before the Supreme Constitutional Judicial Council, with the case presented by the Attorney General of the Republic or a duly authorised representative.

The Regulation provides for proportionate disciplinary sanctions, ranging from written warnings to dismissal or compulsory retirement, depending on the seriousness of the misconduct. The publication of certain sanctions is provided for in accordance with the applicable legal framework. Disciplinary decisions are subject to judicial review.

Second-instance review is exercised by the Supreme Judicial Council, composed of judges of the Supreme Court, sitting in a different judicial composition than the one exercising first-instance disciplinary powers.

7. *Independence/autonomy of the prosecution service*

➤ **LAW OFFICE**

Separation of roles

The bills for the reform of the Law Office (separation of roles of the Attorney General) are pending before the House of Representatives. The Law Office has participated in the first discussion that took place on 10/9/25 in the competent Parliamentary Committee.

The Attorney General explained to the members of the Parliamentary Committee his reservations on the constitutionality of the amendments which were in line *inter alia* with the reservations expressed by the majority of the members of the Independent ad hoc Committee of Legal Experts that prepared a report on the matter. The Attorney General's opinion as well as the opinions of all seven members of the said Committee are publicly available on the website of the Law Office. Concerns about the constitutionality of the aforementioned bill were also expressed by the President of the Cyprus Bar Association during the discussion in the competent Parliamentary Committee.

Review of the Decisions of the Attorney General

On 2/12/25 the Ministry of Justice and Public Order submitted to the House of Representatives the bill for the judicial review of the decisions of the General Public Prosecutor which builds on the main draft bill providing for the separation of roles of the Attorney General by establishing the position of the General Public Prosecutor. The Law Office had conducted the legal vetting of this draft legislation based on the extensive discussions held between the Ministry of Justice and Public Order, the Law Office and the Supreme Court.

The first discussion of this bill took place on 14/1/26 in the competent Parliamentary Committee. According to the aforementioned Bill, the following decisions of the General Public Prosecutor are subject to judicial review:

- (i) decisions not to institute criminal prosecution against a person for an offence; and
 - (ii) decisions to suspend criminal proceedings on charges against a person before the Assize Court.
- The Supreme Court is designated as the competent court for final and conclusive review of the final decisions of the General Public Prosecutor.

- A decision of the General Public Prosecutor may be annulled on three grounds:
 - (i) bad faith on the part of the General Public Prosecutor;
 - (ii) failure, without good reason, to comply with the established policy of the Office of the General Public Prosecutor of the Republic; and
 - (iii) failure to comply with an annulment judgment of the Supreme Court at the review stage.
- Locus standi to apply for judicial review is granted to:
 - (i) a natural or legal person who suffered harm or damage directly caused by the offence for which prosecution was not instituted or was suspended, who is recognized as a victim; or
 - (ii) a person who is a relative of the victim, where the victim has died as a result of the offence.

Regarding decisions not to institute criminal prosecution, victims can apply for judicial review provided that they have complied with the internal (hierarchical) review procedure first which is also being introduced.

In addition, it should be noted that a Member of Parliament (MP) has also submitted a draft bill on the reform of the Law Office which was also discussed on 14/1/26. The draft bill submitted by the MP has a limited scope. It provides for a fixed period of the years of tenure to the position of the Attorney General and the Deputy Attorney General (8 years non-renewable) and introduces the possibility of review of the Attorney General's decisions by a special Committee.

8. *Independence of the Bar (chamber/association of lawyers) and of lawyers*

9. *Significant developments capable of affecting the perception that the general public has of the independence of the judiciary*

➤ **JUDICIAL SERVICE**

In November 2025, the Supreme Constitutional Court took further steps to enhance transparency and public access to judicial information by launching official social media accounts and a dedicated YouTube channel. These channels are used for the publication of judgments, plain-language summaries and institutional information. The initiative aims to improve public communication and understanding of the work of the Court.

In July 2025, the Supreme Court hosted a group of university students from Cyprus and abroad in the framework of the “Internship at the House of Representatives 2025” programme. The visit included presentations by a Supreme Court judge on the role, mission and challenges of the judiciary, as well as by the Director of the Judicial Training School on judicial training and professional development. The initiative contributed to legal education and to raising awareness of the justice system.

B. Quality of justice²

Relevant topics to be covered in your contribution include:

10. Accessibility of courts (e.g. court/legal fees, legal aid, language)

➤ JUDICIAL SERVICE

In March 2025, the Supreme Court adopted amending Procedural Regulations governing the jurisdiction and procedural framework for the issuance of prerogative writs (*habeas corpus*, *mandamus*, *prohibition*, *quo warranto* and *certiorari*). The amendments consolidated the applicable procedural rules and introduced transparent scales of recoverable legal fees, differentiated by type of prerogative remedy and procedural stage, with a view to improving cost predictability, strengthening legal certainty, and facilitating access to judicial review proceedings.

In September 2025, the Supreme Constitutional Court adopted the *Procedural Regulation on the Operation of the Supreme Constitutional Court (Review Jurisdiction – Transitional Provisions)*, pursuant to Article 135 of the Constitution and the Administration of Justice (Miscellaneous Provisions) Laws (1964–2025). The Regulation governs the procedural handling of appeals under the transitional provisions introduced by the 2022–2025 judicial reforms, providing that the procedural rules of the Administrative Court of Appeal apply *mutatis mutandis*, and aims to ensure procedural continuity and legal certainty during the transitional phase.

➤ MINISTRY OF JUSTICE AND PUBLIC ORDER

See questionnaire.

➤ CYPRUS BAR ASSOCIATION

See questionnaire.

11. Resources of the judiciary (human/financial/material³), remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year)

➤ JUDICIAL SERVICE

No significant targeted increase or decrease in judicial resources or remuneration was reported during the reference period. Adjustments to resources were implemented within the framework of the judicial reform and broader public administration planning.

² Under this topic, Member States are not required to give statistical information but should provide input on the type of information outlined under section 2.

³ Material resources refer e.g. to court buildings and other facilities. Financial resources include salaries of staff in courts and prosecution offices.

➤ **LAW OFFICE**

The Law Office performs a unique and fundamental role under the Constitution in ensuring the proper functioning of the State and the criminal justice system.

Over the years, both the workload and the complexity of matters handled by the Law Office have increased significantly. As a result, the Office's lawyers face considerable daily pressure to carry out their duties in a timely and effective manner. A substantial number of government bills require legal vetting, while the number of criminal cases has also risen markedly. Furthermore, there has been a significant increase in interlocutory proceedings during the investigation phase of criminal cases, due to the growing number of applications for prerogative writs, primarily certiorari (e.g. applications seeking the annulment of search warrants).

In addition, under the current leadership, lawyers of the Law Office have been instructed to attend and provide opinions during parliamentary discussions on bills introduced by Members of Parliament, which has further increased the workload.

All of the above have created an urgent and growing need for additional legal and support staff. To this end, letters have been sent to the Minister of Finance and, more recently, the President of the Republic was informed by the Attorney General of the situation and of the request for the allocation of approximately 30 additional lawyers and around 30 clerical officers. The additional legal staff will primarily support the Departments of Legislative Drafting and Coordination of Constitutional Affairs, Criminal Law, and Fiscal Law. The support staff will, in addition to assisting these areas, replace retiring personnel and contribute to the smooth operation of the Office.

12. Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

➤ **JUDICIAL SERVICE**

During 2025 and early 2026, judicial training activities continued through the Judicial Training School, covering a broad range of substantive and procedural topics relevant to the administration of justice.

In 2025, training focused inter alia on the application of the EU Pact on Migration and Asylum, including the handling of asylum cases, with exchanges among judges from several EU Member States. Further training addressed the implementation of the new Civil Procedure Rules, with particular emphasis on case management. Additional seminars covered the role and procedural acts of the European Public Prosecutor's Office, competition law and judicial oversight in public procurement, as well as the handling of cases involving domestic violence, including the application of the Istanbul Convention and victim-sensitive judicial approaches.

In early 2026, initial training was delivered for newly appointed judges, focusing on judicial ethics and conduct, judicial time management, courtroom behaviour, criminal and administrative procedures, arrest and search warrants, detention orders, death inquests, procedures concerning persons with mental health conditions, and registry procedures.

These activities contribute to the continuous professional development of judges and support the effective and consistent application of national and EU law.

➤ **LAW OFFICE**

The Academy of the Law Office of the Republic was established in late 2022 and, in accordance with its founding framework, aims to provide continuous professional education and training to counsel serving at the Law Office, public servants, and legal professionals more broadly. Its primary objective is to promote lifelong learning in the field of law and to strengthen the capacity of legal professionals.

The Academy's activities are structured around three pillars: fundamental training, lifelong learning, and third-party training. Fundamental training primarily consists of presentations on the main duties and core areas of work of each section of the Law Office and is provided to both entry-level and more senior counsel. Lifelong learning for counsel focuses on the development of professional skills and includes thematic lectures and seminars on current legal issues of particular relevance. Third-party training activities mainly involve the dissemination of knowledge to other public services and stakeholders, such as seminars on legal drafting delivered by experienced counsel to ministries and departments, with a view to improving the quality of law-making.

The Academy collaborates closely with various institutions for the organization of activities. During the reporting period, it has cooperated at different levels with the Cyprus Judicial Training School, the Law Commissioner, the Commissioner for Gender Equality, the Cyprus Bar Association, the Cyprus Academy of Public Administration, NGOs, the Crown Prosecution Service of the United Kingdom, the GREVIO Committee of the Council of Europe, the House of Representatives, and the Office of Overseas Prosecutorial Development of the U.S. Department of Justice.

During 2025, the Academy organised, inter alia, the following activities:

- Seminar on “Conclusion of International Conventions and Memorandums of Cooperation with Other States,” in collaboration with the Cyprus Bar Association (Lifelong Learning / Third-Party Training).
- Presentation on the role and responsibilities of the European Union Agency for Criminal Justice Cooperation (EUROJUST) (Lifelong Learning).
- Two-day workshop on Time and Stress Management (Lifelong Learning).
- Lecture on “Artificial Intelligence in Justice” by Dr Konstantinos Kouroupis (Lifelong Learning).
- Training for Public Prosecutors on the proof of money laundering offences (Lifelong Learning).
- Lecture on EU sanctions issues by Mr Savvas Papasavvas, Judge at the General Court of the European Union (Lifelong Learning).
- Lecture on “Hate Speech” by Dr Aris Konstantinidis (Lifelong Learning).
- Conference entitled “The Legitimate Interest in Administrative Proceedings,” held in memory of Andreas Angelides and co-organised with several academic and institutional partners.

- Two-day training workshop on “Environmental Offences” for Public Prosecutors, co-organised with the NGO Terra Cypria (Lifelong Learning).
- Seminar on “Financial Investigative Techniques (FIT)” for Police officers and Counsel of the Republic, organised by the U.S. Embassy in cooperation with the Academy and the Criminal Justice Sector of the Law Office (Lifelong Learning / Third-Party Training).
- Annual Conference of the Academy entitled “Historical Development, Prospects and Challenges for the Institution of the Attorney General of the Republic – Memorial Event in Honour of Former Attorneys General.”
- Seminar on “Support for Child Victims of Abuse in Criminal Procedure,” co-organised with the NGO Hope for Children and the Children’s Home “Voice” (Lifelong Learning / Third-Party Training).
- A two-day “train-the-trainers” programme and a three-day “Advocacy Skills Seminar” for Counsel of the Republic and Public Prosecutors, delivered with experts from the Office of Overseas Prosecutorial Development of the U.S. Department of Justice, in cooperation with the U.S. Embassy (Lifelong Learning).
- Seminar on “Law of the Sea – Jurisdiction of the Republic of Cyprus,” co-organised with the Police Academy (Third-Party Training), as well as delivery of the same seminar for Counsel of the Republic (Lifelong Learning).

The Academy’s scope of activities continues to expand steadily, and it is actively engaged in further developing and refining its programme to better align with the evolving learning needs of its members and the broader public sector. In pursuing this development, the Academy seeks not only to diversify its educational offerings but also to ensure that its training remains relevant, forward-looking, and responsive to emerging professional demands.

In the long term, these efforts aim to strengthen the quality, consistency, and effectiveness of the services provided by the Law Office in its role as legal adviser to the Government. At the same time, the Academy seeks to enhance awareness and understanding of contemporary legal challenges, regulatory developments, and best practices among its members and across the wider public sector. Through continuous improvement, structured planning, and targeted capacity-building initiatives, the Academy aspires to contribute to professional excellence, institutional credibility, and informed decision-making within public administration.

13. *Digitalisation (e.g. use of digital technology, including electronic communication and AI tools, within the justice system and with court users, procedural rules, access to judgments online)*⁴

➤ JUDICIAL SERVICE

In 2025, Cyprus continued the digital transformation of its justice system.

In August 2025, the Judicial Service concluded a contract for the upgrade of the iJustice platform into a comprehensive Case Management System, with phased implementation beginning in September 2025 and covering all court jurisdictions, including the Supreme Court and the

⁴ Factual information presented in Commission Staff Working Document of 2 December 2020, SWD(2020) 540 final, accompanying the Communication on Digitalisation of justice in the European Union, COM(2020) 710 final and Figures 40 to 48 of the 2025 EU Justice Scoreboard, does not need to be repeated.

Supreme Constitutional Court. The upgrade aims to establish a unified digital infrastructure for managing the full lifecycle of judicial proceedings, with enhanced reliability and cybersecurity.

In December 2025, an AI-based Digital Assistant was introduced on the websites of the Supreme Court, the Supreme Constitutional Court and the government portal (gov.cy), providing 24/7 informational guidance on judicial procedures in Greek and English, without processing personal data or offering legal advice. In parallel, Cyprus adopted the European Commission's reference implementation software for the service of documents and the taking of evidence, in line with Regulations (EU) 2020/1784 and 2020/1783, and participates in EU-level technical processes to ensure interoperability with standards such as e-CODEX. The Judicial Service is also assessing the broader use of remote hearings and AI-supported tools for legal research.

In November 2025, the Supreme Constitutional Court further enhanced transparency and access to judicial information by launching official social media accounts and a YouTube channel for the publication of judgments, plain-language summaries and institutional updates.

➤ **CYPRUS BAR ASSOCIATION**

See questionnaire.

14. *Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)*

➤ **JUDICIAL SERVICE**

See Question 13 above.

15. *Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.*

➤ **JUDICIAL SERVICE**

In the context of the reorganisation of the judicial map, the Twenty-First Amendment of the Constitution (Law No. 130(I)/2025), together with the related legislative acts Laws No. 141(I)/2025, 142(I)/2025 and 143(I)/2025, led to the establishment of an autonomous administrative jurisdictional branch.

Article 146 of the Constitution was revised to expressly provide for the establishment of an Administrative Court of Appeal as a second-instance court. This reform created a distinct two-tier administrative judicial structure, composed of first-instance administrative courts and the Administrative Court of Appeal. First-instance administrative courts include the Administrative Court and the International Protection Administrative Court.

As part of the same reform, matters relating to the service status of administrative judges, including appointment, promotion, transfer and disciplinary supervision, were transferred to the

Supreme Constitutional Judicial Council. This completed the institutional separation of the administrative jurisdiction from the civil and criminal jurisdiction.

Administrative justice is thus organised as a specialised judicial branch dealing exclusively with public law disputes. Appeals against decisions of the Administrative Court and the International Protection Administrative Court lie with the Administrative Court of Appeal. The Supreme Constitutional Court examines administrative cases only in the limited circumstances provided for by law.

As regards fraud and corruption cases, these fall within the criminal jurisdiction. They are examined by the ordinary criminal courts, in accordance with the general judicial map, including the District Courts and the Assize Courts, depending on the seriousness of the offence. No specialised courts or chambers dedicated exclusively to fraud and corruption cases are in place.

➤ **MINISTRY OF JUSTICE AND PUBLIC ORDER**

See questionnaire.

16. *Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.*

➤ **JUDICIAL SERVICE**

See Question 12 above.

➤ **MINISTRY OF JUSTICE AND PUBLIC ORDER**

See questionnaire.

➤ **CYPRUS BAR ASSOCIATION**

See questionnaire.

C. Efficiency of the justice system⁵:

E.g. Measures as regards length of proceedings, to address backlogs, ...

Other – please specify

➤ **JUDICIAL SERVICE**

In November 2025, the Supreme Constitutional Court adopted the *Procedural Regulation on the Timely Delivery of Decisions by the Administrative Courts*. The Regulation was adopted pursuant to Articles 135, 135A and 152(1) of the Constitution and the relevant legislation on the administration of justice. It establishes a binding procedural framework aimed at ensuring the delivery of judicial decisions within a reasonable time in administrative justice proceedings.

The Regulation introduces specific time limits for the issuance of decisions. Final judgments must be delivered within six months from the completion of the hearing, while interim decisions must

⁵ Under this topic, Member States are not required to give statistical information but should provide input on the type of information outlined under section 2.

be issued within two months. Compliance is monitored through a register of reserved judgments, which records the date on which each decision is reserved.

Where a judge is unable to comply with the prescribed time limits, a reasoned written explanation must be submitted to the President of the Supreme Constitutional Court. A justified extension may be granted. Parties are informed of delays and may submit observations. Following the expiry of any extension, an affected party may apply to the Supreme Constitutional Court, which may issue appropriate orders. These may include setting a binding deadline for the delivery of the decision or ordering a rehearing before another competent formation.

Persistent or unjustified non-compliance with the Regulation may give rise to disciplinary proceedings. The framework links judicial efficiency with accountability safeguards, while preserving judicial independence. The Regulation entered into force on 1 January 2026.

In parallel, a comprehensive *Report on the restructuring of the Courts Service* was prepared in the context of the broader judicial reform. The Report aims to strengthen administrative capacity and support the efficient functioning of courts. It proposes a reorganisation of court administration based on a clearer separation between judicial and administrative functions, enhanced professional court management and greater functional specialisation of support services.

Key elements include the redefinition of roles within court registries, the strengthening of case-management and preparatory functions, and the establishment of specialised support units. These measures are intended to reduce the administrative burden on judges and allow them to focus on adjudication.

The Report was examined and approved by the Supreme Constitutional Court, the Supreme Court, and the Ministry of Justice and Public Order and provides the basis for the next stages of implementation, with a view to contributing to shorter proceedings and more effective case handling.

➤ MINISTRY OF JUSTICE AND PUBLIC ORDER

See questionnaire.

II. Anti-corruption framework⁶

A. *The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)*

Relevant topics to be covered in your contribution include:

17. List any **changes** as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/specialised resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any

⁶ Where previous specific reports, published in the framework of the review under the UN Convention against Corruption, of GRECO, and of the OECD address the issues below, please make a reference to the points you wish to bring to the Commission's attention in these documents, indicating any relevant updates, changes or measures introduced that have occurred since these documents were published.

relevant measures taken to effectively and timely cooperate with OLAF and EPPO.

➤ **LAW OFFICE**

In 2025, the request of the European Chief Prosecutor for the deployment of a second European Delegated Prosecutor was accepted.

To date, no cases have been brought before the national courts. The Cyprus Police, which conduct criminal investigations, have been instructed to refer cases falling within the competence of the European Public Prosecutor's Office (EPPO) to the European Delegated Prosecutor (EDP).

With regard to prosecutions, following the commencement of EPPO operations, it was decided that both the national implementing law of the EPPO Regulation and the legislation transposing the PIF Directive required amendment in order to ensure the effective prosecution of offences falling within EPPO's competence. More specifically, the law amending the national implementing legislation of the EPPO Regulation introduced a provision, in line with the EPPO Regulation, expressly granting EPPO the power to initiate, conduct, continue or discontinue criminal prosecutions in Cyprus in respect of offences within its competence. For both criminal investigations and prosecutions conducted by EPPO, the relevant national legislation applies *mutatis mutandis*.

An Attorney of the Republic from the Law Office has been appointed as a liaison with EPPO. Where it is determined that a case falls within EPPO's competence, the Law Office transmits the case to the European Delegated Prosecutor.

➤ **INDEPENDENT AUTHORITY AGAINST CORRUPTION**

See questionnaire.

➤ **CYPRUS POLICE**

See questionnaire.

18. Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption.

➤ **INDEPENDENT AUTHORITY AGAINST CORRUPTION**

See questionnaire.

19. Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators.

➤ **INDEPENDENT AUTHORITY AGAINST CORRUPTION**

See questionnaire.

➤ **CYPRUS BAR ASSOCIATION**

See questionnaire.

B. Prevention

Relevant topics to be covered in your contribution include:

20. Measures to enhance integrity in the public sector *in particular* as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

➤ **INDEPENDENT AUTHORITY AGAINST CORRUPTION**

See questionnaire.

➤ **MINISTRY OF FINANCE (Public Administration and Personnel Department)**

A new Guide of Conduct and Ethics for civil servants, was prepared by the Department of Public Administration and Personnel of the Ministry of Finance in collaboration with the Commissioner for Administration and Human Rights and the Law Commissioner. It was approved by the Council of Ministers on 26.03.2025.

The principles and standards of the Code are based on the provisions of relevant laws in force. In particular, the Guide describes, in a single text and in a simple manner, the responsibilities / obligations of civil servants, the general principles that should govern their actions and their expected behavior in the exercise of their duties, which are included in the Civil Service Law, in the Regulations issued under it, as well as in other special applicable legislative acts like the Protection of Persons who Report Breaches of Union and National Law (whistleblowers), the Law on transparency in public decision-making processes, the Right of access to information of the public sector Law and the Law providing for the protection of natural persons regarding the processing of personal data etc.

The standards of conduct and principles of action of civil servants are included in the following three chapters of the Code:

(a) Fundamental principles of the action of the public service, which include the general principles of legality, serving the public interest, good administration, equal treatment and transparency.

(b) Standards of professional conduct of civil servants in the exercise of their duties and in serving the public, which aim to promote the image and credibility of the public service, like Planning and organizing of work, efficiency and effectiveness in performing work, the proper Serving of citizens, Consistency, responsibility, Professionalism, Secrecy and Confidentiality.

(c) Standards for safeguarding the integrity of civil servants, which include the principles of impartiality, objectivity, avoidance of conflicts of interest, incompatibility, the prevention and fight against corruption and gifts and bribes.

The Code issued in 2025 was prepared to replace the Code issued in 2013.

21. Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party financing).

➤ **INDEPENDENT AUTHORITY AGAINST CORRUPTION**

See questionnaire.

➤ **CYPRUS BAR ASSOCIATION**

See questionnaire.

➤ **HOUSE OF REPRESENTATIVES**

See questionnaire.

22. Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned).

➔ For the three previous points, **please also provide information and figures on their application/enforcement**, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.).

➤ **INDEPENDENT AUTHORITY AGAINST CORRUPTION**

See questionnaire.

➤ **CYPRUS BAR ASSOCIATION**

See questionnaire.

23. Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given).

➤ **MINISTRY OF JUSTICE AND PUBLIC ORDER**

We consider that the measures already outlined in the reports of previous years provide comprehensive and sufficiently detailed information on this matter.

With regards to the number of external reports received by the competent authorities, this information was collected in the context of statistical reporting pursuant to Article 27(2) of Directive (EU) 2019/1937. The available data indicate that 25 external reports were submitted in 2024. The corresponding data for 2025 will be collected and made available by May 2026.

➤ **CYPRUS POLICE**

Professional Standards and Inspections Directorate

Since 29 April 2024, a dedicated whistleblower reporting page has been operational on the official website of the Police. The platform provides a form enabling the submission of both identified and anonymous reports or complaints. For security reasons, submissions made through this platform are automatically transmitted to a designated official government email address, which is monitored at regular intervals throughout the day.

Between 1 January 2025 and 31 December 2025, a total of 80 reports or information submissions were registered, the majority of which were submitted anonymously. Of these, 79 reports were assessed as falling outside the scope of the whistleblower protection legislation, while one report is currently being examined on a preliminary basis in accordance with the applicable legal framework. In all instances, the Police leadership was duly informed, and the information received was forwarded to the competent departments or offices for further evaluation and any necessary action.

The Director of the Professional Standards and Inspections Directorate reports directly to the Deputy Commissioner of Police and is responsible for safeguarding the professional standards of police officers. This responsibility includes the conduct of ex officio inspections and the review of

officers' external activities. In 2025, the Directorate investigated 38 cases and carried out inspections in 48 police stations.

24. *Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups.*

- *Such high-risk sectors could include: public procurement, including construction, transport/infrastructure, defence, cohesion, agriculture, environment, healthcare, investor residence schemes, large-scale investments of national interest and the spending of EU funds, urban planning.*
- *In particular, measures to mitigate high risks of corruption in the area of public procurement, such as enhancing transparency and oversight (for example through digital technologies) and promoting fair competition and accountability in public procurement (e.g. targeted actions to address the high share of single bids) and measures to guarantee the effective and independent functioning of the public procurement review bodies.*

➤ **LAW OFFICE**

The Financial Intelligence Unit (FIU) (MOKAS) requires obliged entities, when submitting Suspicious Transaction Reports (STRs) via electronic means, to indicate at the time of filing the possible predicate offence associated with the reported activity. This includes, inter alia, corruption-related offences. STRs related to corruption are prioritised by the FIU for financial analysis and, where reasonable grounds for suspicion are identified, are disseminated to the Police for further investigation.

In 2025, the FIU finalised a Strategic Analysis Report (see attached) examining trends and patterns emerging from STRs submitted by obliged entities. The report was circulated to reporting entities, the Police and the relevant supervisory authorities. It includes typologies relating to corruption-linked STRs and identifies relevant red flag indicators. The purpose of the strategic analysis is twofold: to enhance the operational effectiveness of the FIU and to provide the regulated sector with targeted information on money laundering (ML) risks and emerging patterns, based on intelligence held by the FIU. In doing so, it contributes to the early detection and prevention of criminal activity through the identification of suspicious transactions.

Furthermore, in order to strengthen early risk identification and the prevention of criminality, a Public–Private Partnership (PPP) has been established, bringing together the FIU, the Police and domestic commercial banks. The initiative seeks to enhance and further develop the national framework for combating money laundering and terrorist financing (ML/TF), as well as associated predicate offences. The first Strategic Analysis Report prepared within the framework of the PPP was finalised and circulated to the participating sectors in December 2024. This initiative operates in addition to, and does not replace, the statutory obligation of banks to report suspicious transactions or activities related to ML/TF and associated predicate offences to the FIU.

➤ TREASURY OF THE REPUBLIC (PUBLIC PROCUREMENT DIRECTORATE)

The Public Procurement Directorate (PPD) has implemented a comprehensive reform aimed at the professionalisation of public procurement in Cyprus. In this context, 45 procurement officers have completed an extensive training programme comprising 32 working days. The training curriculum and materials were based on **ProcurCompEU**, a competency framework developed by the European Commission identifying 30 core competences required for procurement professionals. The trained procurement officers are expected to apply appropriate methodologies in order to undertake, or provide structured support for, procurement activities across all contracting authorities in a horizontal and consistent manner.

In addition, the PPD is implementing a new e-procurement system, which is scheduled to become operational in February 2026. Among its enhanced functionalities, the system will provide stakeholders with comprehensive information covering the full lifecycle of public procurement procedures — from project initiation through to contract completion and final acceptance. This currently unavailable end-to-end visibility will support decision-makers and audit authorities in assessing the effectiveness and efficiency of procurement procedures, while significantly strengthening transparency and accountability.

Furthermore, the PPD has launched a new website featuring a dedicated section on procurement statistics. This section provides detailed and granular data on public procurement activities and contract awards from January 2019 onwards. Interested parties have unrestricted access to this information, which includes, inter alia:

- Public procurement procedures published and awarded since January 2019, disaggregated by Contracting Authority;
- The largest Contracting Authorities in terms of total award value and number of procedures conducted;
- The largest contractors, both overall and per Contracting Authority (in terms of number of awards and total contract value), with the possibility for users to identify specific procedures awarded to each contractor;
- Information on award criteria applied (e.g. Most Economically Advantageous Tender (MEAT), lowest price), as well as the average number of bids received per Contracting Authority.

The enhanced statistical reporting and open access to procurement data contribute substantially to improving transparency and oversight of public procurement procedures.

Moreover, the PPD of Cyprus, together with five other Member States, has successfully applied for and received support under the Technical Support Instrument (TSI) to connect national procurement data sources to the **Public Procurement Data Space (PPDS)**. The PPDS is an EU-level platform designed to centralise and harmonise access to public procurement data that has previously been fragmented across different national and EU-level systems. This initiative is expected to significantly enhance transparency, data quality, availability and completeness of procurement data across the Union. The project is currently under implementation.

➤ MINISTRY OF JUSTICE AND PUBLIC ORDER

The Ministry of Justice and Public Order has taken concrete measures to promote the implementation of international best practices and compliance programmes in the public and private sector, notably through a national funding programme supporting the implementation and certification of ISO 37001 anti-bribery management systems.

The programme explicitly addresses foreign bribery risks, including third-party due diligence, internal controls, whistleblowing mechanisms, and risk assessments for cross-border activities, and is aligned with the Organisation for Economic Co-operation and Development (OECD) and the United Nations Convention against Corruption (UNCAC) standards.

To date, 95 entities have applied and have been approved for funding, and the process of implementation and certification is currently ongoing. Through this targeted financial support and accompanying guidance, the Ministry is actively strengthening compliance culture and corruption-prevention frameworks in the private and public sector.

Within the framework of approving the ISO 37001 Anti-Bribery Management Systems funding programme, the Council of Ministers decided to designate certain public-sector authorities and required them to promote and pursue the procedures for ISO 37001 certification.

These authorities are:

- the Department of Customs,
- the Tax Department,
- the Department of Civil Registry and Migration,
- the Department of Lands and Surveys,
- the Department of Town Planning and Housing,
- the Department of Road Transport,
- the Department of Labour,
- the Social Insurance Services, and
- the Department of Environment.

This decision aims to strengthen preventive anti-bribery frameworks and integrity safeguards in key areas of public administration.

25. *Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)*

C. Repression

Relevant topics to be covered in your contribution include:

26. *The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery*
27. *Official data on the number of investigations, prosecutions, final judgments, and the application of sanctions for corruption offences (differentiated by offence if possible)⁷. Please indicate*

⁷ Please include, if available the number of (data since 2022 or latest available data): indictments; first instance convictions, first

whether the cases: involve legal persons; are related to the implementation of EU or national funds⁸; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data.

➤ LAW OFFICE

Important note: Since the following information refers to pending cases, we do not consent to be published

During 2025, the Cyprus Police initiated ten (10) corruption-related cases. Five (5) cases were brought before the Court, four (4) cases are under investigation and one (1) case was forwarded to the Attorney's General Office for instructions (the suspected persons are officials of the Forestry Department). Out of the five (5) cases that were brought before the court, three (3) cases are considered high-level cases since the accused are a high-ranking government official, officials of the department of prison and a high-ranking church official.

Also, three (3) cases that were initially reported to Independent Authority Against Corruption, were forwarded by the Attorney General to the Cyprus Police for investigation. In one case, a current member of Parliament is involved, in the second case a high-ranking official of a local government organization is involved and in the third case an ex-minister and various officials are involved. This relates to a development of a project in the Limassol District. Therefore, the total number of corruption cases that are or were investigated by the Police in 2025 is thirteen (13) out of which seven (7) cases are under investigation.

It is worth mentioning that the Attorney General's Office and the Independent Authority Against Corruption have established good channels of communication which has resulted in fruitful cooperation in their common fight against corruption.

During 2025, a total of four (4) persons were convicted for corruption related offences by the Cypriot Courts in four (4) cases that were tried. These include two (2) cases that were initiated in 2022, one (1) case that was initiated in 2021 and one (1) case that was initiated in 2020. Among the convicted persons was a high-ranking government official, a high-ranking municipal official, a chairman of a community council and a lawyer in a case related to the corruption in the private sector.

Sport Corruption

During 2025, the Cyprus Police initiated six (6) sport corruption-related cases. Two cases were brought before the Court. One (1) case is under investigation and three (3) cases were forwarded to the Attorney's General Office pending instructions.

The investigation of a high-ranking sports official that begun in 2023, was completed and was forwarded to the Attorney's General Office for instructions.

Ongoing cases relating to the Investor Citizenship Scheme

One criminal case in relation to two former Ministers is scheduled for hearing on 9.3.2026.

instance acquittals; final convictions; final acquittals; other outcomes (final) (i.e. excluding convictions and acquittals); cases adjudicated (final); imprisonment / custodial sentences through final convictions; suspended custodial sentences through final convictions; pending cases at the end of the reference year.

⁸ For MS participating in the EPPO, data on cases related to EU funds does not encompass investigations and prosecutions carried out by the EPPO.

In relation to one criminal case against the former Speaker and a former member of Parliament, the Court will deliver its judgment on 17.2.2026. The Court had previously found that there was a prima facie Case against the defendants.

The case against a law firm in Larnaca and its staff led to acquittal by the Larnaca Assize Court. The Attorney General of the Republic appealed against the acquittal of all accused persons and succeeded. The Court of Appeal quashed the acquittal and ordered retrial. The accused tried to obtain leave to appeal to the Supreme Court but this was rejected so the case will proceed for retrial. It is expected to commence soon.

Another case involving a developer and his lawyer which led to the acquittal on violations of the CIP and conviction on VAT offences by the developers has been appealed by the Attorney General of the Republic and the appeal is pending. The appeal covers both the acquittal of the defendants and also the inadequacy of the sentence imposed on the developer for the VAT violations for which he was found guilty.

Lastly, as we have already informed the Commission Services, on 12th of December 2025 an amendment law was published in the Official Gazette, Law 224(I)/2025, which permanently deletes the provisions of the CIP as requested by the Commission.

➤ **CYPRUS POLICE**

See questionnaire.

28. *Potential obstacles identified in law or in practice to the investigation and prosecution of high-level and complex corruption cases (e.g. political immunity regulation, procedural rules, statute of limitations, cross-border cooperation, pardoning)*
29. *Information on effectiveness of criminal and non-criminal measures and of sanctions (e.g. recovery measures and administrative sanctions) on both public and private offenders.*

Other – please specify

➤ **MINISTRY OF JUSTICE AND PUBLIC ORDER**

On 16 September 2025, the Compliance Report concerning Cyprus under the GRECO evaluation process was made public. The report assesses the measures adopted by the Cypriot authorities to implement the recommendations issued during the evaluation round.

Of the 22 recommendations addressed to Cyprus, 6 were fully implemented already at the first compliance stage (4 relating to the Central Government and 2 relating to the Police). Furthermore, substantial progress has been achieved in relation to a significant number of the remaining recommendations. In particular, of the 16 recommendations still under consideration, 13 have been assessed as partially implemented (7 concerning the Central Government and 6 concerning the Police), while 3 have not yet been implemented (2 concerning the Central Government and 1 concerning the Police).

GRECO acknowledges the significant progress achieved in several key areas concerning persons with “top executive functions” and welcomes the specific measures taken with regard to law enforcement agencies.

III. Media pluralism and media freedom

A. Media authorities and bodies⁹

Relevant topics to be covered in your contribution:

30. Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies.

➤ **MINISTRY OF INTERIOR & Radio Television and Digital Services Authority (RTDSA)**

[See questionnaire](#)

31. Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies.

➤ **MINISTRY OF INTERIOR & Radio Television and Digital Services Authority (RTDSA)**

[See questionnaire](#)

32. Existence and functions of media councils or other self-regulatory bodies.

➤ **MINISTRY OF INTERIOR & Radio Television and Digital Services Authority (RTDSA)**

There has been no change in the status or existence of self-regulatory bodies since the previous reporting period.

B. Safeguards against government or political interference and transparency and concentration of media ownership

Relevant topics to be covered in your contribution include:

33. Measures taken to ensure the fair and transparent allocation of state advertising

➤ **MINISTRY OF INTERIOR**

[See questionnaire.](#)

34. Safeguards against state / political interference, in particular:

- safeguards to ensure editorial independence of media (private and public)

➤ **MINISTRY OF INTERIOR & Radio Television and Digital Services Authority (RTDSA)**

Regulation (EU) 2024/1083 (European Media Freedom Act – EMFA), as well as the corresponding draft implementing legislation currently pending adoption by the House of Representatives, introduce provisions aimed at strengthening and safeguarding editorial independence.

- specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal),
safeguards for their financial and operational independence (e.g. related to reporting

⁹ Cf. Article 30 of Directive 2018/1808.

obligations and the allocation of resources) and safeguards for plurality of information and opinions

➤ **MINISTRY OF INTERIOR & Radio Television and Digital Services Authority (RTDSA)**

See questionnaire.

- information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licences, company operation, capital entry requirements, concentration, and corporate governance

➤ **MINISTRY OF INTERIOR & Radio Television and Digital Services Authority (RTDSA)**

As already noted, the draft legislation currently pending adoption, which aims to establish the necessary enforcement procedures for the implementation of the European Media Freedom Act, provides for a strengthened role of the Media Regulatory Authority (RTDSA). In particular, the RTDSA will be directly involved in the assessment of media concentrations and will have the competence to approve concentrations insofar as they concern media service providers.

35. Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

➤ **MINISTRY OF INTERIOR & Radio Television and Digital Services Authority (RTDSA)**

As already indicated, under the draft implementing legislation for the enforcement of the European Media Freedom Act (EMFA), and in particular in accordance with Article 6 of the EMFA, the regulatory authority will establish and maintain a database containing comprehensive information on media ownership, including details of beneficial owners.

C. Framework for journalists' protection, transparency and access to documents

Relevant topics to be covered in your contribution include:

36. Rules and practices guaranteeing journalist's independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists.

➤ **MINISTRY OF INTERIOR**

Relevant provisions to ensure the effective enforcement of Article 4 of the European Media Freedom Act (EMFA) have been incorporated into the draft implementing legislation currently pending adoption.

➤ **COMMISSIONER FOR ADMINISTRATION AND THE PROTECTION OF HUMAN RIGHTS (OMBUDSMAN)**

The Commissioner, as an independent NHRI, monitors issues affecting freedom of expression and the media, including journalists' independence and safety.

In particular, the Commissioner may:

- Receive and investigate complaints regarding public administration practices that may threaten journalists' independence or safety.

- Issue recommendations to public authorities to ensure compliance with national and international standards on press freedom, including protection of journalistic sources and communications.
- Promote awareness and public dialogue on the obligations of authorities to protect journalists.
- Encourage timely and effective follow-up by authorities on alerts submitted to the Council of Europe's Platform for the Protection of Journalism and Safety of Journalists.

The Commissioner has launched the “Stop Hate Speech & Disinformation” public awareness campaign, implemented in collaboration with the Advisory Committee on Human Rights and other civil society stakeholders. Launched on the International Day for Combating Hate Speech (June 18), the campaign aims to raise public awareness of the risks posed by toxic public discourse, disinformation, and online hate speech. Key actions include:

- Posting and sharing informational materials and posters on social media (Facebook and X).
- Displaying campaign messages on public billboards in Nicosia and distributing printed materials to all government services for visible display.
- Engaging institutions and the public through repeated interventions, including during election periods, to highlight the importance of responsible communication and countering misinformation.
- Reinforcing the message that hate speech and disinformation “must stop,” linking public awareness to journalist safety and the protection of freedom of expression.

This campaign supports, inter alia, a safe and independent environment for journalists and the media, strengthening public access to reliable information.

In addition, the Commissioner has a longstanding practice of safeguarding freedom of expression more broadly through ex officio interventions in various contexts, such as:

- The cancellation of a theatre performance by the Cyprus Theatre Organization due to public opposition, emphasizing that personal opinions cannot justify broad censorship and that public authorities must respect democratic procedures.
- Artistic freedom and religious sensitivities in visual arts exhibitions, highlighting that freedom of expression in art must be balanced with respect for others' human rights and religious beliefs.
- Limitations on audiovisual access for persons with disabilities, linking accessibility to the right to receive and express information.
- Restrictions on the freedom of expression of military personnel, stressing that legal limitations must be proportionate and not undermine the core of the right, in line with European Court of Human Rights standards.

Together, the campaign and these broader interventions contribute to promoting a culture of respect for human rights, pluralistic dialogue, and the rule of law, in line with national and European human rights obligations.

37. *Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists.*

38. *Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the*

classification of information).

➤ **INFORMATION COMMISSIONER**

Access to information constitutes an enabling right and a core component of the Rule of Law. In my capacity as Information Commissioner, my mandate is to ensure the effective exercise of this right in practice, while maintaining a proportionate balance with the protection of the public interest.

Cyprus has an established legal framework. The main challenges we observe relate not to the law itself, but to consistent implementation and administrative practice.

Since 2021, the Office has examined over one hundred complaints, many of which were resolved following our intervention, without any appeal being lodged against our decisions. This reflects both growing public awareness and institutional effectiveness.

Our focus remains on guidance, follow-up and awareness-raising, with the aim of fostering a sustainable culture of transparency that supports accountability, media freedom and public trust. Independence, institutional continuity and accountability guide the work of the Office.

In the context of efforts to achieve the core objective of the Office and in light of the ongoing redesign of the websites of Public Sector Authorities, on the 20th of October 2025, I issued the [Circular 2/2025](#) reminding the obligation of the public authorities to adopt, maintain and review a publication scheme at regular intervals.

During the first quarter of 2026, an awareness-raising campaign is planned with the aim of informing the public about the Law and its implementation.

At the current stage, available resources are being assessed in order to identify and evaluate potential follow-up measures, including training initiatives, the development of informational material, and other related actions.

Awareness-raising efforts are ongoing through targeted campaigns and official announcements. Relevant information is regularly published on the Office's website.

39. *Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits.*

The Ministry of Justice submitted the draft bill transposing the Anti-SLAPP Directive to the House of Representatives in December 2025 and it has already been examined by the relevant Committee in January 2026. The Directive is required to be transposed into national law by May 2026. It is anticipated that the bill will be adopted by the end of March 2026, prior to the suspension of parliamentary proceedings in view of the parliamentary elections scheduled for May 2026.

Other – please specify

IV. Other institutional issues related to checks and balances

A. The process for preparing, enacting and implementing laws

Relevant topics to be covered in your contribution include:

40. *Framework, policy and use of impact assessments and evidence-based policy-making, stakeholders¹⁰/public consultations (including rules and practices on the transparent*

¹⁰ This includes also the consultation of social partners.

participation of civil society to policy development and decision-making processes, and transparency and quality of the legislative process in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation).

➤ **MINISTRY OF FINANCE (GENERAL DIRECTORATE FOR GROWTH)**

Cyprus has established clear policies and practices for impact assessments, evidence-based policymaking, and public consultations. These practices are designed to ensure transparency, inclusiveness, and efficiency throughout the entire legislative cycle, from policy preparation and parliamentary review to implementation. They include defined procedures for involving civil society, guidance on effective implementation of legislation, and the use of digital platforms to enhance accessibility, reliability, and overall effectiveness.

The Council of Ministers approved the e-consultation platform on 4 January 2024, as the central portal for conducting public consultations, together with the revised Practical Guide issued by the Directorate-General Growth. The guide requires the early identification and notification of relevant stakeholders during the preparation of draft legislation and sets a minimum consultation period of four weeks. This period may be extended for complex proposals or shortened in cases of extreme urgency. Competent authorities are required to publish responses to stakeholder input on the platform within two weeks of the consultation's closure. Authorities are also encouraged to carry out annual evaluations of consultation effectiveness, taking into account factors such as the number and relevance of contributions received, the consultation tools used, and the extent to which stakeholder input contributed to refining policy objectives.

The operational e-consultation platform publishes new legislative proposals, significant amendments, and key policy initiatives for review and commentary before submission to Parliament. It promotes transparent and early participation by enabling citizens, businesses, professional bodies, and organizations to provide input at an early stage of policymaking. Stakeholder feedback supports burden reduction by identifying unnecessary administrative requirements, legal complexities, or redundancies, thereby improving legislative quality and proportionality and reducing the need for subsequent amendments and administrative effort.

To support effective implementation, public consultation coordinators have been appointed in each ministry and service. These coordinators oversee ongoing consultations, provide technical support to responsible officers, and ensure coordinated implementation across administrations. A dedicated training session for officers from various ministries and departments was held in October 2025.

Usage data demonstrate a steady and significant increase in platform use. Consultations rose from 112 in 2024 to 249 in 2025. Over the same period, the number of participating services and departments increased from 77 to 101, stakeholder comments from 792 to 2,341, and registered external users from 472 to 1,122, representing increases of more than 100% across key indicators. The DG Growth continues to act as the central authority responsible for platform maintenance and monitoring and ensures that all ministries conduct internal assessments using a standardised template. Regular reviews by the DG Growth promote quality, timeliness, and the application of best practices, supported by ongoing guidance and training.

Impact assessments are mainly carried out through the Regulatory Impact Assessment (RIA) process during the legislative drafting stage. Each ministry is responsible for assessing its own proposals. These assessments are primarily qualitative in nature, with quantitative analysis applied selectively where appropriate.

The e-legislation platform, currently under development, is expected to further improve the quality of the legislative process across the preparatory and implementation phases. The platform will digitalise legislative procedures and provide consolidated versions of Cypriot legislation, including primary laws and subsequent amendments. It will also allow users to view the state of any law at a specific point in time. These features will enhance clarity, accessibility, and legal certainty for public authorities, legal professionals, the judiciary, businesses, and citizens.

41. *Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency/urgent procedure compared to the total number of adopted decisions)*
42. *Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.*
43. *Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight.*
44. *Regime for constitutional review of laws*

B. Independent authorities

Relevant topics to be covered in your contribution include:

45. *Independence, resources, capacity and powers (including effective access to relevant data) of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions¹¹*

➤ COMMISSIONER FOR ADMINISTRATION AND THE PROTECTION OF HUMAN RIGHTS (OMBUDSMAN)

In the Republic of Cyprus, the Commissioner for Administration and the Protection of Human Rights exercises the combined mandate of a National Human Rights Institution (NHRI), Ombudsman, and Equality Body, while audit responsibilities are exercised separately by the Auditor General of the Republic. The Commissioner's role encompasses the promotion and protection of human rights, examination of maladministration, advancement of equality and anti-discrimination standards, and oversight of fundamental rights in relevant contexts. The Institution operates with full independence, adequate resources, and broad authority, in accordance with national, European, and international standards.

In October 2022, the Sub-Committee on Accreditation of the Global Alliance of National Human Rights Institutions re-examined the Commissioner's application for re-accreditation and upgraded the Institution to NHRI Status A, from Status B accredited in 2015. This upgrade confirms full compliance with the Paris Principles, ensuring that the Commissioner exercises its mandate independently, possesses sufficient authority, and is adequately resourced to promote and protect human rights effectively.

The Commissioner's mandate is established under Law 3(I)/1991, the Law on the Commissioner for Administration, and the Combating of Racism and Other Discrimination (Commissioner) Law (L.42(I)/2004). These laws provide that the Commissioner operates impartially and effectively, free from interference. The legal framework ensures that the Commissioner is not accountable to the Government, Parliament, or any other public authority, and receives no instructions in

¹¹ Cf. the website of the European Court of Auditors: <https://www.eca.europa.eu/en/Pages/SupremeAuditInstitutions.aspx#>

exercising powers.

Annual Reports on institutional activities are submitted to the President of the Republic and the President of the House of Representatives, while a monthly memorandum summarising reports and interventions is submitted to the Council of Ministers and the President of Parliament. The Council examines these memoranda in special sessions, inviting relevant services to report on their compliance with the Commissioner's recommendations.

The Commissioner has full discretion to initiate, continue, or discontinue investigations, whether following a complaint or ex officio, and determines the procedures for obtaining information as deemed appropriate.

Appointment to the office is for a six-year term, with restrictions on holding other paid offices, and dismissal is permitted only under conditions equivalent to those of Supreme Court judges. Legal immunity applies to acts performed in good faith in the exercise of official functions, and neither the Commissioner nor staff may be compelled to testify regarding matters arising from their duties.

Although Cyprus is a Presidential Republic, the Commissioner's appointment requires prior approval by a majority of the House of Representatives. As the governing party does not hold a parliamentary majority, cross-party consensus is necessary. This ensures full independence, as the Commissioner is the only public official in Cyprus whose appointment requires prior parliamentary approval. The current appointment procedure was formalised in 2022 through a binding decision of the Council of Ministers, introducing an open call for applications prior to the expiry of the term.

This procedure was first applied in practice in April 2023 when Mrs. Maria Stylianou-Lottides was reappointed for a six-year term with overwhelming parliamentary approval. Historical precedent demonstrates effective parliamentary oversight, as in 2011 a candidate for the Commissioner position was rejected by Parliament, necessitating the nomination and appointment of an alternative candidate with prior parliamentary approval.

The Commissioner strengthens institutional independence and operational capacity through the management and recruitment of staff. Staff members are specifically recruited as Officers of the Office, are not interchangeable with other administrative services, and no posts are filled with secondees. Specialised recruitment examinations are conducted independently from general government exams to ensure candidates are selected based on specific qualifications and expertise. Between 2020 and 2022, twelve Officers were recruited through this process, with additional promotions and positions expected to be filled in 2025–2026.

Staff with indefinite contracts are hired exclusively under private labour law contracts at the Commissioner's discretion and may be dismissed only in cases of serious disciplinary offenses. Furthermore, ten percent of vacant posts are reserved for persons with disabilities, in accordance with applicable law. Two additional staff members will be assigned to support the newly designated responsibility of monitoring fundamental rights compliance during screening and asylum procedures under the EU Pact on Migration and Asylum.

The Commissioner has full control over institutional resources and budget. The annual budget is prepared based on institutional needs and strategic planning and is submitted to the Ministry of Finance for approval by Parliament in full, without reductions or deductions. The Commissioner exercises complete management and oversight of appropriated funds. Historically, all requested budget amounts have been granted, ensuring the necessary financial, technical, and human

resources for the full implementation of the Institution's broad mandate.

The powers and functions of the Commissioner under the NHRI, Ombudsman, and Equality Body mandates are extensive. The Commissioner promotes and protects human rights through the submission of opinions, recommendations, proposals, and reports, drawing government attention to violations and proposing appropriate remedies. The Commissioner examines complaints, issues recommendations in cases of maladministration or human rights violations, and conducts ex officio investigations. In the capacity of Equality Body, the Commissioner intervenes in cases of discrimination or breaches of equality principles in both public and private sector activities, including the power to issue binding recommendations. Furthermore, the Commissioner monitors compliance with fundamental rights in the implementation of EU-funded programmes and provides guidance to Managing Authorities and Intermediate Bodies, ensuring that recommendations are followed prior to programme approval in accordance with the EU Charter of Fundamental Rights and the UNCRPD.

Through these robust institutional safeguards, the Commissioner for Administration and the Protection of Human Rights operates independently, effectively, and impartially, fulfilling its mandates as NHRI, Ombudsman, and Equality Body in full compliance with the Paris Principles. This guarantees the protection of human rights, accountability, equality, and good governance in Cyprus, ensuring that all persons within its jurisdiction benefit from independent and effective oversight and protection.

46. Statistics/reports concerning the follow-up to recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies, and supreme audit institutions in the past year.

➤ **COMMISSIONER FOR ADMINISTRATION AND THE PROTECTION OF HUMAN RIGHTS (OMBUDSMAN)**

Concerning 2024, the following data are included in our 2024 Annual Report (not yet officially submitted to the President of the Republic and therefore not yet published):

During 2024, the examination of 2,709 complaints was completed (an average of 260 complaints per month). In 1,783 cases, compliance by the involved Authorities/Services was achieved following the Commissioner's intervention through mediation, without the need to submit a formal Report. The compliance rate in such cases was approximately 91%, demonstrating the high effectiveness of our approach in promoting voluntary compliance and problem-solving without formal escalation.

During 2024, the Commissioner submitted 140 Reports / Ex Officio Interventions, with the compliance rate of the involved Authorities/Services being approximately 55%. For around 21% of these Reports / Ex Officio interventions, the Authorities/Services have already informed the Commissioner's Office that they have taken or intend to take measures in line with the Commissioner's recommendations. In many cases where full compliance is not yet achieved, partial implementation of the recommendations has occurred, especially when multiple recommendations are involved.

Furthermore, 762 complaints were found, after examination, not to fall within the Commissioner's remit, and complainants were informed accordingly.

The relevant statistics for 2025 are not yet complete and will be included in the 2025 Annual Report, the preparation of which has already begun.

This data underscores that the Commissioner places special emphasis on achieving compliance through mediation, aiming to resolve issues effectively before formal reporting becomes necessary. The high voluntary compliance rate highlights the success of this approach, while formal Reports/Ex Officio interventions remain a critical tool when further action is required.

47. Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators such as national economic oversight, enforcement and competition authorities.

➤ **CYPRUS SECURITIES AND EXCHANGE COMMISSION**

The effective independence of Cyprus Securities and Exchange Commission ('CySEC') is ensured through a framework of institutional, operational and governance safeguards. These safeguards aim to protect the integrity of supervisory action, while reinforcing public trust and market confidence.

The key safeguards can be grouped as follows:

1. Operational Independence

Operational independence is safeguarded through:

- the statutory allocation of supervisory and enforcement powers, including the authority to conduct on-site inspections and investigations, collect information, call parties for testimony, impose sanctions, proceed to settlements, suspend trading of financial instruments and require the cessation of unlawful practices, and issue Directives/Circulars;
- a collective decision-making structure vested in the CySEC Board, with clearly defined quorum;
- the establishment of specialised committees, including an Audit Committee, which reinforces internal oversight and its composition excludes CySEC's Chairman and Vice- Chairman, which are executive members of the Board;
- the provision of legal protection for Board members, consultants, staff and investigating officers, shielding them from personal liability for actions taken in the lawful exercise of their duties.
- In view of the publication of the ESA's Criteria on the Independence of Supervisory Authorities¹², CySEC is in the process of re-assessing its operational independence and propose enhancements to the Government, with a view to ensuring full discretion to allocate resources and full autonomy to recruit, retain and further develop experienced and skilled staff, including the freedom to set remuneration and contractual conditions applicable to its staff, in compliance with the ESA's criteria.

2. Personal Independence

Personal independence is ensured through safeguards relating to the appointment, tenure and conduct of decision-makers:

- Board members are appointed and dismissed by the Council of Ministers, with fixed terms of office and limited renewability;
- the Chairman and Vice-Chairman serve on a full-time and exclusive basis, prohibiting any

¹² https://www.esma.europa.eu/sites/default/files/2023-10/JC_2023_17_Joint_ESAs_Supervisory_Independence_criteria.pdf

- parallel employment or conflicting activity;
- eligibility and integrity criteria apply to all Board members, including requirements of good reputation, competence and absence of criminal convictions;
- Conflict-of-interest rules prohibit Board members from participating in matters where they, or persons connected to them, have a personal or professional interest;
- Conflict-of-interest restrictions apply also to CySEC's employees.
- Two Year "cooling-off" periods apply to former Board members and senior officials before taking up private-sector employment, except where an approval is granted by an independent body.

3. Financial Independence

Financial independence is supported by:

- a diversified funding model, combining supervisory fees and an annual government contribution;
- a transparent budgetary and reporting framework, including annual financial statements audited by the Auditor General and submitted to the Minister of Finance.
- In view of the publication of the ESA's Criteria on the Independence of Supervisory Authorities, CySEC is reassessing the financial independence arrangements, with a view to propose amendments to the Government, to ensure full alignment with the ESAs' criteria, including through securing stable, predictable, transparent and sufficient financial resources, safeguarding the authority's independence, and ensuring that budgetary approval and resource allocation are free from undue influence by the government or the supervised sector.

4. Accountability and Transparency

Independence is reinforced by strong accountability mechanisms, including, institutional accountability to the Parliament, transparent rule-making procedures, with secondary rules being adopted through established processes, involving public or targeted consultation and published in the Official Gazette and extensive public disclosure practices, including publication of:

- annual reports,
- annual and quarterly market statistical reports,
- annual financial statements,
- Board decisions and sanctions and relevant court rulings

➤ COMMISSIONER FOR ADMINISTRATION AND THE PROTECTION OF HUMAN RIGHTS (OMBUDSMAN)

The Commissioner is not a supervisory or regulatory authority with a direct impact on economic operators. Therefore, this question does not apply to our institution.

However, the Commissioner intervenes in cases of maladministration, misuse of public authority, discrimination, and human rights violations, including in the context of monitoring compliance with fundamental rights in the implementation of EU-funded programmes. While this mandate concerns the administration of public funds rather than direct regulation of economic operators, it ensures that public authorities managing EU funds adhere to fundamental rights and equality standards, thereby indirectly supporting lawful and fair practices in public administration.

➤ CENTRAL BANK OF CYPRUS

According to Article 130 of the Treaty on the Functioning of the European Union (TFEU) neither a national central bank nor any member of its decision-making bodies shall, when exercising the

powers and carrying out the tasks and duties conferred upon them by the Treaty and the ESCB Statute, seek or take instructions from Community institutions or bodies, from any government of a Member State or from any other body. Inversely, the Community institutions and bodies and the governments of the Member States must respect this principle and may not seek to influence the members of the decision-making bodies of the national central banks in the performance of their tasks. This principle of independence, as provided for in the Treaty, has been adopted in section 7 of the Central Bank of Cyprus Laws of 2002-2007 as subsequently amended (the CBC Law).

Concerning personal independence, the ESCB Statute contains specific provisions, for example, on the term of office of the governor of a national central bank and the grounds for his dismissal (Article 14.2 ESCB Statute) which have been adopted in Articles 118-121 of the Cyprus Constitution. The CBC also enjoys financial independence; its budget is approved by its Board of Directors and is sent to the Parliament for information purposes.

The Governor of the CBC is an ex officio member, as an independent personality, of the General Council and the Governing Council of the ECB and has the exclusive competence to carry out the tasks and exercise the powers conferred upon the Bank by or in accordance with the provisions of the ESCB Statute. The Governor is appointed by the President of the Republic of Cyprus (according to the Cyprus Constitution) and dismissed as prescribed in Article 118.4 of the Cyprus Constitution (personal independence).

The 2006 Convergence Report concluded that the CBC Law was compatible with the Treaty as regards independence.

C. Accessibility and judicial review of administrative decisions

Relevant topics to be covered in your contribution include:

48. *Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)*

➤ CYPRUS SECURITIES AND EXCHANGE COMMISSION

The Cyprus and Exchange Commission ('CySEC') announces/publishes its decisions for the imposition of administrative sanctions/measures, pursuant to the European Directives that had been harmonized and transposed into Cyprus law and which, also, provide for the content of such announcements and any limitations as to what can be announced to the general public.

In cases where the European Directives do not provide specifically for the publication of the decisions relating to the imposition of administrative sanctions/measures, CySEC implements the provisions of article 30 of the Law 73(I)/2009 and especially article 30(4) of the said Law. Specifically, according to the article 30(4) of Law 73(I)/2009, it is provided that, for transparency reasons, CySEC and the persons stated in subsection (1) of article 30, may disclose confidential information and thus, CySEC may proceed with the publication of Board Decisions containing such confidential information.

It is noted that, all personal data collected by CySEC is processed in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) and/or the national equivalent regime.

All administrative decisions/sanctions taken by the Board of Directors of CySEC are, primarily, disclosed to the interested party, dully and adequately justified, as per the provisions of article 26 of the Law 158(I)/1999, and relevant announcements, subject to the applicable legislation, are published on CySEC's website at <https://www.cysec.gov.cy/en-GB/public-info/decisions/> (Board

Decisions). It is important to note that, CySEC's announcements published on its website are presented in a summarised format, containing only the essential information required to be disclosed to the public, under the applicable legislation.

➤ **COMMISSIONER FOR ADMINISTRATION AND THE PROTECTION OF HUMAN RIGHTS (OMBUDSMAN)**

The Commissioner ensures that administrative authorities respect the principles of transparency, accountability, and good administration. All administrative decisions are required by law to be reasoned, and the Commissioner monitors compliance with this requirement through complaints handling, ex officio interventions, and the submission of Reports. Most authorities respond promptly when information is requested during the investigation of complaints, although there are some exceptions where delays occur.

The Commissioner's Office publishes Annual Reports, as well as separate reports on specific mandates such as the NPM and Equality Body functions, and every one or two years for other mandates, providing citizens with access to information regarding the functioning of public authorities and their compliance with legal and human rights obligations. Data concerning complaints, recommendations, and compliance are systematically collected, analyzed, and published in the Annual Report to monitor the effectiveness of interventions and identify recurring issues in public administration.

In line with the principle of good administration, the Commissioner promotes legality, transparency, impartiality, and effectiveness in public decision-making. Interventions are conducted primarily through recommendations and mediation, and in many cases compliance is achieved without the need to submit a formal Report.

49. *Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review).*

50. *Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)*

➤ **COMMISSIONER FOR ADMINISTRATION AND THE PROTECTION OF HUMAN RIGHTS (OMBUDSMAN)**

The Commissioner provides an independent non-judicial mechanism to address decisions or inaction by administrative authorities. The Commissioner examines complaints submitted by individuals, as well as matters identified ex officio, to ensure that public authorities act lawfully, respect human rights, and adhere to principles of good administration.

Upon investigation, the Commissioner may issue recommendations, opinions, and guidance to the relevant authority. Authorities are legally obliged to respond to complaints and take corrective action where appropriate. Most authorities respond promptly when information or clarification is requested during complaint investigations, though there are occasional delays.

The Commissioner's interventions serve as a remedy and corrective measure outside the judicial system. In many cases, compliance is achieved without the need to submit a formal report, although reports are issued when necessary to document findings and to alert authorities to

systemic issues. Data concerning complaints, recommendations, and compliance are systematically collected and published in the Commissioner's Annual Report, ensuring transparency and monitoring of administrative performance.

Through these procedures, the Commissioner ensures that citizens have access to effective remedies against maladministration or administrative inaction, promoting accountability, fairness, and adherence to legal and human rights standards in public administration.

51. *Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)*

52. *Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation*

➤ **LAW OFFICE**

With regard to the initiative undertaken by the Ministry of Justice and Public Order to introduce a new legal framework governing the compliance of administrative authorities with decisions of the Administrative Court, it should be emphasised that the Law Office has, from the outset, expressed its willingness to provide its expertise, knowledge and experience, and has offered legal advice during the drafting stage of the proposed legislation in order to contribute meaningfully to achieving the best possible outcome.

In this context, the Law Office submitted written observations and suggestions, drawing on and referencing the most recent relevant case law^[1]. Furthermore, at an early stage, the Law Office clarified that the proposed legislation should, in line with the established legislative practice in Cyprus and in conformity with European and international standards, undergo substantive and open consultation with key stakeholders and the public prior to the submission of a finalised draft bill to the Law Office for legal vetting^[2].

To date, no such draft bill has been formally submitted to the Law Office for legal vetting. According to information received from the Ministry of Justice and Public Order, the draft bill, as prepared by the Ministry, was placed under public consultation and numerous comments have been received from various stakeholders. The Ministry is currently in the process of reviewing and assessing these comments before submitting the revised draft to the Law Office for legal vetting.

This answer also applies to Q.51 above.

53. *Oversight, including by courts, of the use of intrusive surveillance software by national authorities*

^[1] Relevant letters giving advice and guidance were sent to the Ministry of Justice on 6.12.23 and 2.2.2024.

^[2] After the official vetting process, which is carried out by the Law Office, a Bill is submitted before the Council of Ministers accompanied by the Proposal of the Ministry having the competence to introduce it (in the current case the Ministry of Justice) and upon its submission, a Ministerial Decision is taken for its further submission to the House of Representatives, or not.

D. The enabling framework for civil society

Relevant topics to be covered in your contribution include:

54. Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

➤ **MINISTRY OF INTERIOR**

See questionnaire.

55. Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures to protect them from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services, as well as available remedies.

➤ **MINISTRY OF INTERIOR**

In the framework of its efforts to support and safeguard non-profit organisations (NPOs), the Ministry of Interior issued, in November 2024, a Best Practices Report on terrorist financing risks affecting NPOs in Cyprus (“the Report”). The Report was disseminated electronically to NPOs and has also been made publicly available on the official website of the Ministry of Interior.

The objective of the Report is to provide guidance on proposed measures and best practices enabling NPOs to protect themselves against potential misuse for the purposes of terrorist financing. It further aims to raise awareness of the general risks faced by NPOs, as well as the specific risks relevant to the Republic of Cyprus in the context of terrorist financing.

In addition, and in furtherance of the same objectives, the Ministry of Interior organised educational seminars throughout 2025 in all districts of the Republic of Cyprus. These seminars focused on strengthening awareness and capacity-building among NPOs in relation to the prevention of terrorist financing and money laundering.

56. Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

➤ **MINISTRY OF INTERIOR**

In order for a non-profit organisation (NPO) to be eligible for funding—whether from the State or from third parties—it must be duly registered as a legal entity and is therefore subject to regulation and oversight in accordance with the provisions of Law 104(I)/2017. There are no restrictions on funding, unless otherwise provided for in the statutes of the respective NPO.

The Ministry of Finance is the competent authority responsible for the implementation of separate legislation governing the tax-exempt status of NPOs, which is granted on the basis of specific statutory criteria.

E. Initiatives to foster a rule of law culture

This can include developments related to initiatives to foster a rule of law culture, please specify which, (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, education initiatives, etc.):

➤ HOUSE OF REPRESENTATIVES

The Standing Committee on Institutions, Merit and the Commissioner for Administration (Ombudsman) of the House of Representatives systematically and comprehensively examines the annual reports concerning the state of the rule of law in Cyprus.

With regard to the European Commission's Annual Rule of Law Report, the Committee regularly convenes meetings with all relevant stakeholders in order to conduct a thorough examination of each of the Report's pillars.

In relation to the 2025 Annual Rule of Law Report, the Committee examined all four pillars of the Report during its meetings held on 3 and 24 September 2025.

➤ COMMISSIONER FOR ADMINISTRATION AND THE PROTECTION OF HUMAN RIGHTS (OMBUDSMAN)

The Commissioner for Administration and the Protection of Human Rights actively fosters a culture of the rule of law in Cyprus through public awareness campaigns, ex officio interventions, legislative input, and collaboration with civil society.

In 2025, the Commissioner undertook multiple initiatives to promote the rule of law, human rights, equality, and inclusion, ensuring active public participation and awareness of legal and human rights obligations. These initiatives include:

- Campaign against hate speech and disinformation: In collaboration with the Advisory Committee on Human Rights, the Commissioner launched a public awareness campaign addressing hate speech and disinformation. The campaign informs citizens and public authorities about the societal impact of misinformation, the importance of respectful communication, and the protection of vulnerable groups. It includes dissemination of educational materials, public outreach, and engagement with media stakeholders. The campaign is ongoing, reflecting the Commissioner's commitment to accountability, respect for human rights, and transparency in public discourse.
- Awareness campaign for the elimination of violence against women: On the International Day for the Elimination of Violence against Women (25 November), under her mandate as the Equality and Anti-Discrimination Body, the Commissioner issued a public intervention emphasizing the need for continuous, decisive, and collective action against gender-based violence. An awareness poster was distributed to all government offices and circulated electronically to empower victims and support reporting of abuses.
- Awareness and inclusion campaign for persons with disabilities: On the UN International Day of Persons with Disabilities (3 December), the Commissioner launched the campaign

“Together we break barriers, together we apply equality. Inclusion for all.” The campaign highlighted ongoing barriers faced by persons with disabilities in accessing healthcare, education, employment, recreational activities, and political participation, and raised awareness of their higher risk of poverty and social exclusion. Campaign messages were disseminated nationwide, including public signage and digital platforms. Public interventions addressed systemic issues and individual cases, promoting inclusive practices, reasonable accommodations, and respect for rights.

- Advisory Committee for the UN Convention on the Rights of Persons with Disabilities: In 2025, the Commissioner presided over the expansion and reorganization of the Advisory Committee to ensure meaningful participation of persons with disabilities and their representative organizations beyond the Cyprus Confederation of Organisations of Persons with Disabilities (KYSOA). The 2012 composition was revised to fully comply with Cabinet decision No. 73.519/2012. An open call for applications was issued and evaluated by the Commissioner and KYSOA. The revised Committee strengthens monitoring of compliance with the Convention, promotes human rights, and ensures active participation of persons with disabilities in decision-making processes affecting them.

The Hate Speech and Disinformation campaign involved collaboration with the Advisory Committee on Human Rights, which includes representatives advocating for persons with disabilities, refugees, former detainees, the elderly, and LGBTI+ persons, ensuring diverse civil society perspectives in promoting the rule of law.

Through these initiatives, the Commissioner has reinforced the rule of law by promoting respect for human rights and fundamental freedoms, transparency, accountability, and participation in public decision-making, awareness of obligations under domestic and international law, inclusion, equality, and protection of vulnerable groups, as well as the prevention of discrimination, violence, and abuse.

Furthermore:

- The Commissioner actively participates in debates before the House of Representatives, providing input on draft legislation and reforms affecting human rights, equality, accessibility, and inclusion, including reforms in special education, disability services, and employment policies.
- Through complaints handling, ex officio interventions, and the issuance of recommendations or reports, the Commissioner ensures that public authorities act lawfully and in line with human rights obligations. Data concerning complaints, recommendations, and compliance are systematically collected and published in the Commissioner’s Annual Reports. Many interventions lead to compliance by authorities without the need for formal reports, demonstrating the effectiveness of mediation and advisory functions in promoting legality, accountability, and transparency.
- Through public information, workshops, and dissemination of campaign materials, the Commissioner educates both public officials and citizens on their rights, responsibilities, and best practices in administration, strengthening awareness and promoting adherence to rule of law principles.

Through these combined actions, the Commissioner fosters a culture of the rule of law characterized by transparency, accountability, equality, and respect for human rights, while actively engaging citizens, civil society, and public authorities in reinforcing democratic governance.

Cross-pillar elements: cross-border rule of law issues related to the Single Market

If you are aware of any significant challenges concerning the Single Market faced by businesses or citizens from your Member State in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, please highlight them in your input¹³

➤ CYPRUS BAR ASSOCIATION

See questionnaire.

➤ CYPRUS SECURITIES AND EXCHANGE COMMISSION

As a smaller Member State with a high concentration of cross border investment services activity, CySEC the NCA of the financial services sector observes challenges in the Single Market stemming from legal uncertainty and uneven supervisory scrutiny and policy making intensity, including through ESAs' convergence and soft law tools.

Insufficiently granular Level I legislation, together with reliance on Level II/III measures and ESAs' convergence tools (such as Q&As, Opinions, Supervisory Briefings, Public Statements and other soft law instruments), can introduce expectations or obligations beyond what is explicitly set out in EU law. These requirements may disproportionately affect entities from smaller Member States that rely on passporting to operate across borders, as such work is often focused on business models and products offered on a cross border basis.

In some cases, the exercise of powers by host NCAs, or the adoption of additional national measures, may result in cross border constraints where the basis is not adequately robust, potentially placing home NCAs in a position where they need to act on the basis of perceived violations that are not underpinned by clear and demonstrable grounds, within the time frames set by host authorities to maintain smooth cross border operations and avoid reputational risk.

Similarly, selective supervisory and policy focus by ESA, on certain products or business models concentrated in particular jurisdictions, while, comparable activities in other markets. attract less attention, can create perceptions of unequal treatment and may affect proportionality, legal certainty, confidence in the Single Market and conditions for market access.

The absence of adequate EU checks and balances on ESAs' work, including in relation to the definition of policy work, formal independent review of convergence and policy initiatives, structured public consultation for all policy instruments, and clear criteria for initiating convergence and policy initiatives by ESAs can exacerbate these asymmetries and create potential barriers to cross border market access.

These challenges may be addressed through enhanced legal clarity, consistent criteria for supervisory engagement, structured checks and balances on all ESAs' convergence and policy tools, and outcome-based convergence that is neutral with respect to providers' geographic

¹³ Given the cross-cutting nature of this question, it is included as a separate section in the questionnaire. Information collected under this question will however be integrated under the relevant existing pillar(s) of the Report.

locations in the EU. In addition, instances where Member States adopt additional national measures beyond EU requirements in a way that may fragment the Single Market should be appropriately considered by the European Commission in a timely manner in order to ensure the uniform functioning of the Single Market.