

1. What are the current priorities of MENAC and the upcoming activities?

With regard to the current priorities of the MENAC, it is important to note that, in accordance with the [2026 Activity Plan](#), four major strategic areas of intervention have been defined.

The **first priority** consists of **strengthening MENAC's operational capacity and consolidating its recognition as the national anti-corruption prevention authority.**

In this context, the aim is to **reinforce the institution's internal and external communication, deepening engagement with its key stakeholders — public and private entities, civil society, and academia. Communication and digital awareness campaigns** are also planned to promote integrity, public ethics, and compliance with the General Regime for the Prevention of Corruption and the general whistleblower protection regime. The objective is to position MENAC as a credible reference authority, close to citizens and organizations alike.

The **second priority** concerns **the promotion and consolidation of a culture of integrity and transparency.**

In this regard, particular emphasis is placed on the **preparation of the annual anti-corruption report, to be submitted to Parliament and to the Government**, as a key instrument for assessing public policies in this field. **The issuance of recommendations and technical guidance aimed at strengthening transparency and probity is also envisaged**, as well as the monitoring of their implementation whenever appropriate.

The **third priority** focuses on **ensuring the effective implementation of the General Regime for the Prevention of Corruption.**

MENAC will continue to promote this regime among the entities concerned, reinforcing it as an essential instrument for regulatory compliance. At the same time, **inspection, supervisory and, where applicable, sanctioning activities will be intensified**, ensuring that legal obligations are not merely formal but effectively fulfilled.

Finally, **the fourth priority** relates to the **development of systems for the collection, organization, and exchange of information on the prevention and repression of corruption and related offences.**

In this context, cooperation will be strengthened with as many public and private entities as possible. By way of example, this includes the Court of Audit, the Public Prosecution Service and the High Council for the Judiciary. This institutional cooperation aims to deepen knowledge, improve practices in the prevention, detection and repression of corruption and promote more coordinated and effective action.

2. Regarding the amendments to the structure and functioning of MENAC, which entered into force in May 2025:

- a. How has this impacted its functioning? Did those amendments sufficiently address the issues at stake, in particular effectiveness and limited operational activities?

The amendments to the structure and functioning of MENAC, which entered into force in May 2025, resulted in **a significant institutional strengthening of the entity.** This had **a particular impact in terms of clarifying its competences, reorganising its internal structure (ensuring greater**

operational capacity, embedding collegial decision-making, and providing a more agile and stable framework), and consolidating its supervisory and monitoring powers.

Accordingly, since last August, MENAC has a new governance structure, namely:

- A **Board of Directors (composed of one Chair and two Board Members)**, which now centralises the powers arising from the MENAC legal framework and which were previously exercised exclusively by a single individual;
- A **Secretary-General**, responsible for providing technical and administrative support in matters relating to the management of human, financial and patrimonial resources, under the direction of the Board of Directors;
- **Two operational Units: the Planning, Prevention and Information Unit and the Supervision and Administrative Offences Unit**, each headed by one of the Board Members.

It is also important to **highlight the impact on MENAC's activity resulting from the expansion of the Advisory Board's role**. Now its composition includes all sectoral and regional supervisory bodies, a representative appointed by Court of Audit, and a representative of non-governmental organisations active in the field of research, study and the fight against corruption and related crime. Also its remit has been broadened to include the power to issue opinions on other particularly relevant acts and documents, **namely all plans and reports to be submitted to Parliament and to the Government (including the Annual Anti-Corruption Report), the staffing plan, the internal regulations, and the appointment of the Secretary-General.**

From **a functional perspective**, these changes have contributed to:

- **a more robust development of supervisory and control responsibilities**, particularly in monitoring compliance programmes and corruption risk prevention plans;
- **strengthening coordination with public and private entities, promoting a more systematic monitoring approach**;
- **improving procedural predictability, through clearer definitions of deadlines, reporting obligations and consequences for non-compliance.**

With regard to operational effectiveness, it is important to stress that:

- **within the Supervision and Administrative Offences Unit**, administrative offence proceedings are already underway, making use of Artificial Intelligence as an innovative tool and good anti-corruption practice;
- **within the Planning, Prevention and Information Unit**, there is a clear focus of MENAC's work on prevention, training (notably through webinars), and education initiatives, without overlooking the issue of corruption in sport.

While these changes represent a significant formal step forward, **important challenges remain ahead, particularly in attracting qualified human resources and in ensuring the capacity to carry out a truly proactive and systematic supervisory role, especially in light of the large number of entities subject to oversight.**

b. What are the remaining outstanding challenges to the functioning of MENAC?

The remaining outstanding challenges to the effective functioning of MENAC can be grouped into three main areas: **facilities, operational procedures, and human resources.**

1. Facilities

At the time of its creation, MENAC was provided with premises owned by an entity within the justice sector. While these facilities allowed the institution to begin its work, they never fully met the ideal conditions required — particularly in terms of location, infrastructure, and overall working conditions.

Since taking office last August, the current Board of Directors has made **securing permanent and adequate premises a top priority.**

The new premises are intended to meet two essential objectives:

- To ensure a central and visible location, reflecting the prominent role MENAC seeks to play in the public and media space and reinforcing its image as a dynamic and accessible institution;
- To provide appropriate infrastructure and working conditions, enabling higher levels of performance and strengthening our ability to attract and retain qualified staff.

2. Operational Procedures

For an organisation of MENAC's size, entrusted with multiple and highly demanding responsibilities, full professionalisation is key. Effectiveness requires a strong culture of standardised procedures, clear internal rules, implementation of best practices, and rigorous resource management.

As a young and relatively small entity, MENAC did not initially have a comprehensive set of governance and management instruments in place. We are therefore conducting an assessment of our structure and performance, while simultaneously developing and approving essential internal frameworks.

These include:

- A consolidated internal regulatory framework;
- Structured staff training programmes;
- Clear onboarding and offboarding policies;
- The introduction of remote working arrangements, which had not previously been implemented;
- The adoption of modern governance and management tools aligned with best institutional practices.

These measures are crucial to ensure consistency, credibility, and institutional robustness, in line with the responsibilities entrusted to MENAC.

3. Human Resources

Human resources remain our most significant strategic challenge.

Past framework:

The original staffing plan — which formally remains in force — provided for 27 staff members, in addition to the President and Vice-President. Importantly, it did not foresee permanent in-house staff; all positions were temporary, and secondment was the only available recruitment mechanism.

Current situation:

Following last year's legislative and organisational reforms, MENAC now benefits from a clearer and more functional structure. Crucially, it is now legally possible to recruit permanent staff under MENAC's own staffing framework.

Recruitment mechanisms now include:

- Secondment (mobility) for up to 18 months;
- Consultants (limited to six positions) for up to three years;
- The Board of Directors and the Secretary-General, with a four-year mandate;
- Permanent staff members.

However, significant challenges remain:

- Historically, secondment was the only legal mechanism available;
- There were no specific financial incentives;
- The pool of qualified specialists in this field is limited, both in the public and private sectors.

- c. Regarding the staffing of MENAC the objective is mentioned of ensuring MENAC will be able to conduct its tasks through its own stable staff. What is planned to ensure that MENAC reaches the necessary staffing levels to achieve this? Which aspects of MENAC's work will staff recruited in January and February 2026 contribute to? Does the issue of resources still constitute a challenge?

At present, the official staffing plan provides for 27 positions, of which 21 are filled. We are recruiting two consultants and additional staff for financial and support functions. We have proposed increasing the staffing plan to 54 positions, although we realistically expect authorisation for approximately 10 additional roles.

Strategic priorities:

While the support team is being consolidated, the main priority is strengthening planning and inspection functions. Since 1 January, five new staff members have joined and been allocated to planning and inspection (including administrative offence proceedings). Most of the anticipated additional positions — particularly the creation of six inspector roles — will be directed toward inspection activities.

This reinforcement is critical. MENAC's supervisory and sanctioning competences require specialised technical expertise. Strengthening inspection capacity is therefore a strategic necessity and essential to the effective implementation of our mandate.

To conclude, although significant progress has been made in consolidating MENAC's institutional framework, key challenges remain. Securing adequate facilities, consolidating professionalised procedures, and — above all — reinforcing human resources are essential steps to ensure that MENAC is fully equipped to fulfil its responsibilities with effectiveness, credibility, and long-term sustainability.

3. What has been the impact of the new enforcement capacity, namely the possibility of opening administrative offence proceedings and imposing fines?

The enforcement capacity of MENAC represents a structural strengthening of the national public integrity and anti-corruption framework, particularly within the scope of the RGPC (General Regime for the Prevention of Corruption) and the RGPDi (General Regime for the Protection of Whistleblowers).

It is important, however, to clarify that:

- i. The enforcement legislation has already existence since 2021, insofar as the regulatory framework provided for accountability mechanisms. So, the penalty legislation has been the same since the beginning, however, there have been changes in 2025 to the structure that enforces the administrative offence regime, namely, in what concerns MENAC structure:
 - a. **The sanctions committee, whose powers were unclear in the law, has been abolished and a Supervision and Administrative Offences Unit has been created, with clearer powers.**
 - b. **So, what is now taking place is a more effective and structured operationalization of this capacity, supported by consolidated resources (both human and technical), procedures and administrative practice, and a more proactive approach.**
- ii. Investigative, supervisory, and enforcement activities are effectively underway, including the initiation of administrative offence proceedings. **The first administrative offence proceedings were initiated only in September 2025, under this Board of Directors, and 16 procedures, which are under instruction, took place in 2025 (and 19 more in 2026 until now).** In January 2026, MENAC reported that, with regard to preliminary inquiry proceedings, the entity had: (i) closed 25 preliminary inquiries initiated in 2024 by the former Sanctions Committee, 11 of which resulted in administrative offence proceedings; (ii) initiated 66 (sixty-six) preliminary inquiries in 2025, of which 10 (ten) had been closed and 4 (four) resulted in administrative offence proceedings, with the remaining cases still under analysis.

As of the present date, with regard to administrative offence proceedings, a total of 16 proceedings have already been initiated, 14 of which relate to facts liable to constitute violations of the RGPC and 2 to facts liable to constitute violations of the RGPDi. Among the ongoing cases, 2 administrative offence proceedings were initiated on the basis of complaints.
- iii. We know that this enforcement activity enhances the credibility of the regime, reduces perceptions of impunity, and signals those legal obligations — such as the adoption and implementation of compliance programs — are not merely formal requirements, but binding duties subject to effective oversight, and the impact is particularly significant in terms of prevention and enforcement of the RGPC and the RGPDi. **The opening of administrative offence proceedings was made public, namely by the press, and had repercussions.** The real possibility of initiating administrative offence proceedings has already **produced immediate spillover effects**, namely:
 - a. Greater diligence by obligated entities in implementing and updating their compliance programs.
 - b. Improved quality and completeness of reported information.

- c. Regularization and updating data on the RGPC platform.
- d. Strengthening of internal compliance culture.
- e. More effective relation with the General inspections of the ministries

4. Are there currently any plans to carry out any evidence-based analyses, tailored recommendations for sector-specific risks, or providing guidance in view of the legislative reforms?

There are currently concrete plans and ongoing actions in all three areas: **evidence-based analyses, tailored recommendations for sector-specific risks**, and **guidance in light of recent legislative reforms**.

In terms of evidence-based analyses, MENAC is preparing its **Annual Anticorruption Report**, which is grounded in data collected from multiple institutional sources, including:

- The national statistics system (Directorate-General for Justice Policy - Direção-Geral de Política de Justiça)
- The Courts (High Council for the Judiciary - Conselho Superior de Magistratura)
- The Public Prosecution Services
- MENAC's external whistleblowing channel
- The Criminal Police
- The Probation Services (Directorate-General for Reintegration and Prison Services - Direção-Geral de Reinserção e Serviços Prisionais)
- The Court of Auditors (notably on conflicts of interest)
- The Entity for Transparency (EpT)
- The Political Accounts and Financing Entity (Entidade das Contas e Financiamentos Políticos - EPCFP)
- The Institute of Public Markets, Real Estate and Construction (Instituto dos Mercados Públicos, do Imobiliário e da Construção, I.P. - IMPIC)
- Data relating to the informal economy

This cross-institutional approach ensures a comprehensive and evidence-based assessment of corruption risks and trends.

In addition, following the large-scale rural wildfires last summer, MENAC issued [Recommendation No. 5/2025](#), based on past evidence concerning emergency procedures and public procurement. The recommendation addresses the heightened risks associated with exceptional procurement regimes in crisis contexts, particularly risks to principles such as equal treatment, transparency, impartiality, and proportionality.

It calls on public authorities to:

- Prioritise ordinary procurement procedures wherever feasible;
- Clearly justify the use of exceptional procedures;
- Strengthen conflict-of-interest safeguards;
- Reinforce controls and documentation for beneficiaries of crisis-related support;
- Enhance transparency, including through digital platforms;
- Anticipate and address risks of fraud, corruption, and related offences, including through appropriate reporting mechanisms.

Although a monitoring survey was initially delayed due to subsequent storms and floods causing widespread destruction in Portugal, MENAC maintained its monitoring action and recently relaunched that same recommendation in light of the ongoing emergency response.

In terms of tailored recommendations for sector-specific risks, MENAC is also preparing and planning targeted interventions in specific sectors:

- [Recomendation nº 1/2026](#) focuses on identifying irregularities in compliance programmes and revokes [Recomendation N° 7/2024](#). It aims to simplify implementation of the General Regime for the Prevention of Corruption (RGPC) while providing clearer guidance on the internal functioning of compliance programmes.
- In the **sports sector**, MENAC is likely to issue a new recommendation in anticipation of significant investments in sports-related infrastructure.
- The **defense sector** is also under consideration as a potential area for future tailored recommendations, given its specific risk profile.

In terms of guidance in view of legislative reforms, MENAC provides guidance in three main ways:

1. **Opinions on draft legislation:** MENAC continuously respond to requests for opinions on legislative proposals under preparation in Parliament, Government or Regional Legislative Assemblies. An opinion is currently being prepared following a recent request from Parliament.
2. **Preparation of legislative amendments: in its monitoring capacity as guardian of the RGPC and the General Regime for the Prevention of Corruption-Related Offences (RGPD), MENAC identifies areas where amendments may be needed. It is currently working on proposals aimed at improving MENAC's operational framework and simplifying procedures.**
3. **Guidelines and directives to support implementation**
MENAC regularly issues guidance to ensure effective implementation of legislation ("from law in books to law in action"). The most significant recent guidance, issued in early 2026, clarified who may act as compliance officers — a clarification that was very well received by both public and private entities.

Moreover, Recommendation No. 1/2026 (awaiting publication) also serves a dual purpose: it simplifies compliance obligations while offering structured guidance on the internal implementation of compliance programmes.

5. What are currently the main sectors of high-risk of corruption?

The identification of high-risk sectors is an ongoing priority for MENAC. The 2026 Activity Plan foresees continued studies: (i) on areas at risk of corruption in Portugal, including work that allows future updates of risk mapping; and (ii) on the reality of corruption in Portugal, with a particular focus on distinguishing between perception indicators and actual occurrences.

At EU level, the EC identified in its 2024 in-depth study "*High-risk areas of corruption in EU Member States: a mapping and in-depth analysis*" six broad sectors that are structurally more vulnerable due to the volume of public funds involved, governance complexity, and strong public reliance. These sectors largely coincide with those that are currently receiving particular attention in Portugal:

1. **Public Procurement:** remains one of the most significant high-risk areas, due to:

- ✓ The high financial volume of contracts and public expenditure;
- ✓ The technical and procedural complexity of procurement rules;
- ✓ The risk of conflicts of interest and reduced competition, particularly under exceptional regimes.

In Portugal, local authorities (municipalities) are especially relevant in this context. MENAC is preparing specific actions targeting municipalities, including:

- Risk-mapping studies in cooperation with a university;
- The development of an integrity risk index for municipalities, aimed at supporting monitoring and preventive action.

2. **Healthcare:** this sector is vulnerable to:

- ✓ Procurement fraud and overpricing of medical supplies;
- ✓ Bribery for access to services;
- ✓ Fraudulent billing practices;
- ✓ Weak or fragmented oversight mechanisms.

MENAC already maintains an open dialogue with stakeholders in this sector as part of its preventive approach.

3. **Finance:** this sector presents corruption risks linked to regulatory capture, conflicts of interest, complex financial instruments, and cross-border transactions. Given its systemic relevance, it remains an area of structural risk.

4. **Defence and Security:** this is a particularly sensitive area due to:

- ✓ Confidentiality and secrecy constraints;
- ✓ Large-scale budgets;
- ✓ Opaque or highly specialised procurement processes.

Defence spending has precedents in Portugal as an area exposed to corruption risks. Given the significant investments currently underway and foreseen in the coming years, MENAC is paying specific attention to this sector.

5. **Construction and Infrastructure:** large infrastructure projects involve:

- ✓ High financial value;
- ✓ Complex subcontracting chains;
- ✓ Significant discretion in planning and licensing decisions.

These characteristics create vulnerabilities to collusion, bid-rigging, and conflicts of interest.

6. **Sports:** in this sector, corruption may occur through:

- ✓ Match-fixing and illegal betting;
- ✓ Links to organised crime;
- ✓ Procurement and infrastructure fraud related to major sporting events;

Governance integrity failures. MENAC has recently initiated discussions with counterparts in other countries, particularly in view of anticipated investments in infrastructure linked to major sporting events in Portugal.

6. What has been the impact of the new rules on the oversight of corruption cases, linked to reporting of all corruption-related case outcomes?

At this stage, it is still **premature to draw definitive conclusions** about the full impact of the new rules on the oversight of corruption cases linked to the reporting of all case outcomes.

It is important to clarify that MENAC does **not supervise** the activities of the courts, the Public Prosecutor's Office, or the police. Judicial and prosecutorial independence remains fully safeguarded. MENAC's role is not to interfere with or direct proceedings, but rather to **observe and analyse systemic trends**.

That said, the new legal framework has formalised and strengthened MENAC's role in **observing and reporting on the outcomes of corruption-related cases**. This represents a significant institutional development. In practical terms, it means that MENAC can now:

- Systematically compile decisions and case outcomes;
- Analyse patterns and trends across different types of corruption offences;
- Identify possible inconsistencies or areas where enforcement may appear weaker;
- Integrate this information into broader risk assessments and policy recommendations.

The operational impact is already visible in procedural improvements. The receipt of judicial decisions has been streamlined, notably through a protocol established with the High Council for the Judiciary (Conselho Superior da Magistratura-CSM), facilitating more structured and timely access to relevant information.

As already mentioned, MENAC is currently preparing its Annual Anticorruption Report — to be submitted to Parliament and the Government by 30th April — which will include a comprehensive analysis of data collected from multiple sources. The objective is not merely to gather data, but to progressively enhance analytical capacity in order to extract the maximum possible insight from the information received.

7. What is the state of play regarding implementation of the rules on whistleblowers? *[in writing]* Could you please provide statistics in relation to the implementation of rules on whistleblowing?

The general regime for the protection of whistleblowers has been enshrined in Portuguese law since 2021 through Law N°. 93/2021 of 20 December, transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who clearly report Union law.

Regarding national statistics, MENAC informs that the competent entity for transmitting information will be the Parliament, since, according to Article 17 of Law N° 93/2021, of December 20th, the entities competent to receive complaints prepare an annual report which they submit to that institution.

The report for 2025 can be consulted https://www.parlamento.pt/sites/COM/XVIILeg/ICACDLG/Documents/Relatorios_anuais_Denuncias_externas_2024.pdf

Specifically, regarding the complaints received by MENAC and their respective destination, based on data reported as of 31 December 2025:



- a total of 266 complaints were received at our entity;
- involving 215 entities from the public sector and 51 from the private sector;
- of which 147 had an identified complainant and 119 were anonymous.
- With regard to how they were handled:
 - o 13 were processed within MENAC itself (as they concerned complaints related to the RGPC or the RGPDI – General Regime for the Protection of Whistleblowers of Infractions);
 - o 9 were forwarded to the Public Prosecutor's Office (PGR) as they indicated potential criminal matters;
 - o 67 were referred to the competent administrative authority (as they indicated an administrative offence);
 - o 177 were archived (no irregularity detected, already submitted by the complainant to the competent authority, mere complaint, or duplicate report).

