



**ACTIVITY REPORT
OF THE CHIEF OFFICIAL ETHICS COMMISSION
FOR 2023**



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Abbreviations of names and concepts used in the report (in alphabetical order):

APL – Law on Administrative Proceedings of the Republic of Lithuania.

Compliance Officer – the person designated within an institution or body as responsible for the supervision and control of the area of conflict of interest.

CPEC – Code of Conduct for State Politicians of the Republic of Lithuania.

LAD – declaration on lobbying activities.

LAL – Law on Lobbying Activities of the Republic of Lithuania.

PINREG – Register of Private Interests.

LAPPI – Law on the Adjustment of Public and Private Interests of the Republic of Lithuania.

SKAIDRIS – an information system for transparent legislative processes.

COEC – Chief Official Ethics Commission.

LCOEC – Law on the Chief Official Ethics Commission of the Republic of Lithuania.

About COEC

The COEC is a collegial institution established by and accountable to the Seimas of the Republic of Lithuania to ensure that public authorities and their employees serve the people ethically.

COEC's MISSION:

helping declarants and their managers to manage the risks posed by private interests, and to disclose influence on legislation in a timely and complete manner.

COEC's VISION:

an institution that helps to quickly find the right way to manage conflicts of interest and disclosing influence on legislation easy.

COEC's tasks:

- ✓ help individuals to declare their private interests and adjust them with public interests;
- ✓ ensure that individuals influence legislation in a transparent manner;
- ✓ prevent the emergence and spread of corruption by exercising the powers set out in the Law on Prevention of Corruption of the Republic of Lithuania;
- ✓ help state politicians behave ethically in public life by exercising the powers set out in the Code of Ethics for State Politicians of the Republic of Lithuania;
- ✓ coordinate the development of ethics policy in state and municipal institutions and bodies and other public sector entities;
- ✓ monitor the declaration of private interests, assess and manage the risk of conflicts of interest, and prevent violations in state and municipal institutions and bodies, other public sector entities and other legal entities referred to in the Law on the Adjustment of Public and Private Interests of the Republic of Lithuania where declarants work.

COEC:

- ✓ examine complaints and requests regarding the implementation of the requirements of the Law on the Adjustment of Public and Private Interests of the Republic of Lithuania, the Law on Lobbying Activities of the Republic of Lithuania, and the Code of Conduct for State Politicians of the Republic of Lithuania;
- ✓ provide recommendations, opinions and advice on proper implementation of the LAPPI, the LAL and the CPEC;
- ✓ monitor the adjustment of interests, analysing problems and proposing measures to manage risks;
- ✓ develop preventive measures;
- ✓ organise education on the LAPPI, the LAL, the CPEC, and other topics.

Key aspects of activities in 2023

- We have addressed the challenges of the lobbying declaration process and modernised the SKAIDRIS system, which has facilitated the disclosure of lobbying activities and simplified "cross-declaration".
- We have modernised PINREG by introducing a distance learning tool.
- We have developed and posted on PINREG the first training material on declaring private interests.
- We have developed templates for advance written advice and criteria for assessing potential risks of conflicts of interests.
- We have developed questionnaires and recommendations for heads of institutions or their delegated persons to assess what measures are lacking for effective implementation of the LAPPI and the LAL.
- Focusing on the mission and vision of the COEC, and with a view to streamlining its operations, we have implemented the reorganisation of the COEC Secretariat.

1. Investigations into compliance of conduct of persons with legislation

The COEC monitors the implementation of the Law on the Adjustment of Public and Private Interests, the Law on Lobbying Activities and the Code of Conduct for State Politicians. The Commission examines reports and complaints related to the compliance of the activities of persons other than members of the Seimas with the requirements of the Law on the Adjustment of Public and Private Interests. It also investigates reports and requests concerning the compliance of the activities of natural and legal persons with provisions of the Law on Lobbying Activities.

1.1. Law on the Adjustment of Public and Private Interests

Around 180,000 persons declaring their interests and more than 4,000 public sector organisations in Lithuania, including budget institutions (BIs), public institutions (PIs), state-owned enterprises (SOEs/SEs) as well as public and private limited liability companies (ABs/UABs) are subject to the Law.

The COEC mainly conducts investigations related to state politicians and top-level executives. Otherwise, the COEC delegates investigations to the management of organisations.

The number of reports of possible violations received by the COEC and the number of investigations carried out fluctuate from year to year and are difficult to predict as they depend little on COEC's actions. The number of reports received by the COEC has been similar for the last two years (around 250),

but the number of investigations carried out on the basis of these reports differs quite significantly. In 2022, the COEC investigated and passed 55 decisions compared to 24 in 2023. The ratio between the number of reports received and the number of investigations carried out shows that most of the reports received are unfounded, i.e. not related to private interests or possible personal interests of the reported person, or do not contain information that would make it impossible to open an investigation. Often, the reported actions of the declarant do not fall within the scope of the mandate of the COEC, i.e. the declarant is reported for a possible violation of other laws, e.g. the Law on Civil Service, the Law on Local Governance, the Code of Conduct for State Politicians, etc.

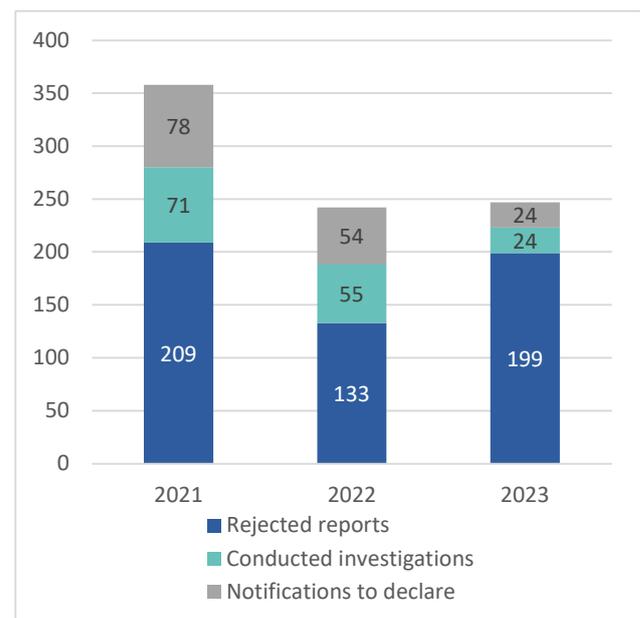


Figure 1. Number of reports received in 2021-2023

The decrease in the number of investigations carried out by the COEC was also due to changes in the Law of COEC as of 2020. When examining reports and deciding whether to open an investigation, the Commission may, in accordance with the changed legal regulation, first of all remind persons of their obligation to declare their private interests by

sending them invitations to submit or to revise or supplement their declaration of private interests within a set time limit. In assessing the validity of the report, the COEC is also entitled to take other pre-investigation actions, such as collecting additional documents and information or asking the applicant to provide them. Thus, the COEC only initiates and carries out investigations in presence of sufficient factual grounds therefor.

In 2023, as is usually the case every year, the majority of violations due to a conflict of private and public interests was found in the case of participation in or attempts to influence the deliberations and adoption of decisions concerning private interests of the declarant or a person close to the declarant (12). 7 of the cases involved state politicians (2 mayors of municipalities and 5 members of municipal councils). The violations of this nature are among the most frequent in the practice of the COEC. Accordingly, out of the 35 recognised violations in 2022, as many as 29 cases of violations of the Law on the Adjustment of Interests were due to a conflict of interest in the performance of official duties (including 10 members of municipal councils and 1 mayor of municipality). According to the COEC, the abundance of these violations in municipal councils undermines public confidence in the impartiality and objectivity of the decisions taken by state politicians.

The main purpose of the Law on the Adjustment of Interests is to ensure that public interests are prioritized when making decisions. Statistics of the investigations carried out by the COEC show that there is still a lot to do in this area. The COEC believes that it is very important to provide assistance to declarants in order to make it as easy as possible for them to identify that their official

duties are related to their private interests. This is something that the COEC pays great attention to. Therefore, in 2023, the COEC finalised a distance learning course on the declaration of private interests intended for all declarants. It also provided advice on the application of the provisions of the Law on the Adjustment of Interests to institutions and bodies conducting investigations into possible violations of the Law on the Adjustment of Interests.



Figure 2. Investigations carried out on the LAPPI in 2021-2023

It should be noted that in the course of monitoring compliance with the Law on the Adjustment of Interests, the COEC also examines requests from individuals regarding an exemption from the restriction on employment established in Article 15 of this Law. This right is granted to the Commission by Article 18 of the Law on the Adjustment of Interests. When investigating these requests, the COEC carries out a thorough assessment of the circumstances: it collects additional documents and information both from the former employer and from the legal person where the person seeks employment, assesses the nature of the person's duties, the functions performed, the extent of responsibility, etc. After assessing the above-mentioned circumstances, the Commission

adopts a reasoned decision to apply (or not to apply) the exemption to the restriction on employment established in Article 15 of the Law on the Adjustment of Interests. In 2023, the COEC examined 11 such requests and took respective decisions (the exemption was not granted in 3 cases).

It should also be noted that the COEC has observed that the recruiting body or institution also draws the attention of the applicant to the fact that he/she may be subject to the above-mentioned restriction, thus referring to the Commission for advice.

	2020	2021	2022	2023
Number of reports received	338	358	242	247
PRE investigations on the LAPPI	102	118	97	36
Calls for submission, revision or completion of a declaration	90	78	54	24
Number of investigations carried out	119	71	55	24
Violations found	76	44	35	19
No violations found or investigation terminated	43	27	20	5
Number of decisions appealed to courts	16	8	7	7
Cases heard and judgments having taken effect to this day	16	8	3	1
of these unfavourable to the COEC	2 in full and 2 in part	1 in full and 1 in part	0	0

Table 1. Control of the implementation of the LAPPI conducted by the COEC in 2020 - 2023

1.2. Law on Lobbying Activities

Around 30,000 individuals involved in the legislative process and more than 4,000 public sector organisations are subject to the Law.

	2021	2022	2023
Number of reports received	25	15	21
Number of investigations carried out	20	6	6
Violations found by the COEC regarding undeclared lobbying activities by a lobbyist	1	0	1
Violations found by the COEC on lobbying activities by persons not included in the list of lobbyists	11	2	3
Number of decisions appealed to courts	5	2	0

Table 2. Control of the implementation of the LAL conducted by the COEC in 2021 - 2023

Key findings on the investigations carried out by the COEC

- Usually, the reports/ complaints submitted are **unfounded and do not fall within the competence** of the COEC;
- There are fewer investigations **due to preliminary investigation actions** performed collecting specific data on a possible violation enabling informed decisions on whether or not to open an investigation;
- Taking court judgements into account, COEC is changing its practice of monitoring compliance with the Law on the Adjustment of Interests: for example, it states violations having determined a **direct and obvious conflict of interests**, i.e. when the official duties performed are obviously related to declarant's private interests and personal interest.

1.3. Preliminary dispute resolution

Conduct of more than 1,500 council members serving in Lithuanian municipal councils is subject to provisions of the Code of Conduct

for Politicians, while Ethics Commissions of municipalities deal with compliance matters. Decisions taken by the Commissions can be appealed to the COEC, which acts as a binding preliminary out-of-court dispute resolution body.

	2020	2021	2022	2023
Number of complaints received by the COEC	21	56	24	17
From an applicant (<i>citizen, politician, journalist</i>) <i>who disagrees with EC's decision taken based on his report</i>	12	30	13	8
From a subject (<i>municipal politician</i>) <i>who has been found by the EC to be in violation</i>	9	26	11	9
Number of refused complaints	6	13	14	8
Number of cases heard	12	40	12	8
COEC upheld the applicant's or subject's complaint annulling EC's decision	6	21	7	8

Table 3. Investigations carried out by the COEC as a preliminary dispute resolution body in 2020-2023

When investigating the complaints submitted to it, the COEC observed that in a number of cases investigations were conducted and decisions were taken in violation of procedural requirements, e.g., the member of the municipal council who was investigated was not given an opportunity to get acquainted with the investigation material, was not invited to a meeting of the Ethics Commission of the municipal council, and was not provided with a report within the deadlines set out in the Code, which would have defined the subject matter of the initiated investigation (the circumstances being assessed) in a comprehensive and clear manner. In addition, the content of the decisions was often insufficient (due to incomplete and non-comprehensive assessment of the data relevant to the investigation, failure to answer the essential questions raised in the applicant's complaint, etc.).

Such deficiencies (procedural and substantive) were significant in finding that

the contested decisions did not comply with the requirements for an administrative decision, and therefore the issues of compatibility of the actions of a civil servant with the requirements of the principles and provisions of conduct set out in the Code were incorrectly resolved, and therefore the COEC annulled the respective decisions of the Ethics Commissions.

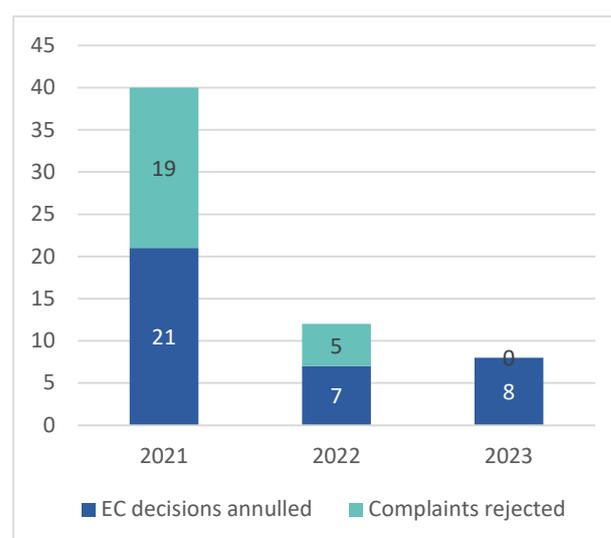


Figure 3: Validity of decisions taken by Ethics Commissions of municipalities in 2021-2023

Challenges in advising politicians and Ethics Commissions of municipalities

Acting as an impartial institution, we face the challenge of simultaneously advising politicians whose conduct is being assessed by municipal Ethics Commissions and the commissions themselves, while they are investigating, and then dealing with complaints from applicants or persons who are the subject of a decision. This situation puts the COEC in a position of institutional conflict of interest, risking the impartiality and fairness of the process. On the other hand, taking into account the enquiries received by the Commission from the Ethics Commissions of municipality councils regarding the application of the provisions of the Code, the Commission drew their attention to the fact that a situation has been observed recently where in the performance of their assigned functions, municipal commissions sometimes fail to comply with the mandatory deadlines for the performance of procedural actions or adoption of decisions set out by legislation (for the opening of an investigation, the performance of an investigation or the adoption of a decision), and has therefore drafted and submitted a consultation to the Ethics Commissions of all the municipal councils on these relevant issues.

Key findings regarding the decisions of Ethics Commissions of municipalities

- Decisions of Ethics Commissions of municipalities are annulled on the grounds of significant procedural violations;
- The application of the Code of Conduct for Politicians in municipalities often becomes more of a formal procedure than a real instrument for building trust and constructive relations between politicians and local communities.

2. Preventive activities

The Organisation for Economic Co-operation and Development (OECD) states that conflict of interest is not in itself corruption, but that it inevitably arises where conflicts between a person's private interests and public duties are not properly managed, or not managed at all, also emphasizing that effective management of conflicts of interest, which are often unavoidable in the course of official activities, depends to a large extent on the ability of declarants to recognise them and to know where to turn in the event of a conflict situation.

In order to improve the efficiency of the provision of services – advice and recommendations in this case – during the reporting year, the majority of enquiries received by e-mail and not signed were answered in the standard manner, i.e. COEC employees respond to enquiries by providing COEC's opinion, which has already been formulated in a similar case.

In the reporting year, out of more than 600 opinions (recommendations) provided on the provisions of the LAPPI and the LAL, COEC employees provided more than half of them within 1-3 business days. This means that individuals receive immediate assistance from an expert in a specific situation.

During the reporting year, key topics of interests of the declarants remained the following: private interests that may give rise to conflicts of interest; ways of managing conflicts of interest; aspects of declaring private interests, with particular reference to data to be declared only in the event of a possible conflict of interest; restrictions after the term of office, the criteria for lobbying activities and exemptions.

	2021	2022	2023
Recommendations on the LAPPI	400	468	575
Recommendations on the LAL	98	57	30
Training on the LAPPI (persons trained)	4130	1420	152
Training on the LAL (persons trained)	2023	1300	131

Table 4. Consultations and training provided by the COEC in 2021 - 2023

The European Commission emphasizes that measures to reduce conflicts of interest and other phenomena detrimental to transparency need to be linked to deep-rooted structural and cultural changes in public sector institutions and wider society, and not just to the adoption of legislation and its formal enforcement. This means not only introducing ethical and lobbying standards of conduct in the public sector, but also educating the public about transparency, its benefits, and the standards of behaviour required. Where possible, during the reporting year, the COEC has been developing tools to help organisations implement standards of conduct internally.

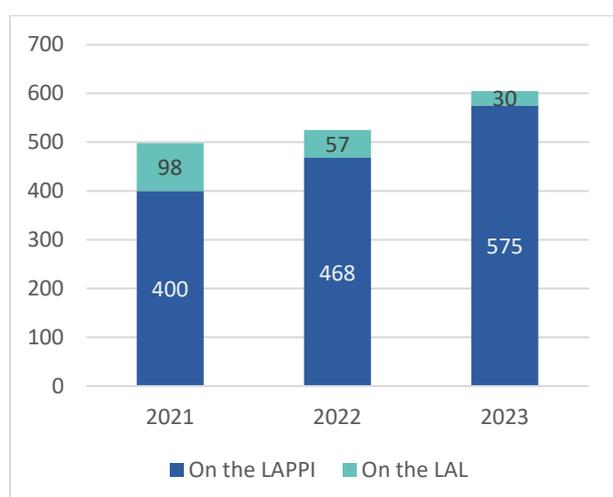


Figure 4: Written recommendations provided by COEC on the provisions of the LAPPI and the LAL in 2021-2023

2.1. Training

In the reporting year, the COEC trained 152 persons on the provisions of the LAPPI and 131 persons on the provisions of the LAL holding face-to-face trainings. This number has been decreasing due to a lack of human resources.

Taking into account the constantly increasing need for training on the implementation of the provisions of the LAPPI and the LAL and in order to address the lack of human resources available to the COEC, the development of distance learning programmes was a priority during the reporting year. In 2023, two courses were developed: “Declaring Private Interests” and “Lobbying”.

The course on Declaring Private Interests is aimed at all those working in the public sector who declare their interests. Upon completion of the course, declarants will know: the extent to which they are covered by the provisions of the LAPPI; who are considered close persons; the procedures and deadlines for declaring private interests; what constitutes a conflict of interest and how it may arise in the course of their official activities; and which data must always be disclosed in the declaration of interests and

which data must only be disclosed in the case of a possible conflict of interests.

The course on Lobbying is intended for people who may be exposed to lobbying influence. Upon completion, participants will know: what constitutes lobbying; who is a lobbyist; the procedures and deadlines for declaring lobbying activities and lobbying influence; what activities are not considered lobbying; and who is not entitled to be a lobbyist.

Both courses will be available on PINREG, having logged in to a personal account at any convenient time. These courses will be available to declarants of private interests under the assignment of the COEC, the head of any organisation or his delegate (Compliance Officer). We expect that the new tools will enable many more persons to acquire relevant knowledge on the application of the LAPPI and the LAL in 2024.

2.2. Compliance assessment tests

In 2023, the COEC developed three compliance assessment tests tailored to different audiences: for managers of a public sector organisation, for compliance officers, and a general one.

The purpose of these tests is to enable these individuals to self-assess their compliance with the established standards for adjustment of interests and lobbying activities and to receive personalized recommendations on how to effectively improve their organisation's processes. This method allows both managers and compliance officers to receive direct feedback.

Tests (questionnaires) are provided to organisations through PINREG. The COEC will

analyse the results and monitor the organisations' progress. Summarising the first results will be possible in 2024.

2.3. Preliminary written recommendations

Pursuant to provisions of the Law on the Chief Official Ethics Commission, the COEC has detailed a tool for managing conflict of interest situations, which is provided for in the LAPPI but is very rarely used in practice – preliminary written recommendations on the performance of official duties abstaining from which is required, and has prepared methodological material for providing such recommendations.

The Commission has made recommendations on how conditions, events and circumstances that may give rise to a conflict of interest should be assessed. It identified risk factors that could give rise to a conflict of interest and damage the reputation of an institution or body, as well as measures to limit the potential for the risk of a conflict of interest to occur and the negative consequences that this may entail.

The methodological material prepared by the COEC is addressed to subjects of control and supervision of the Law on the Adjustment of Public and Private Interests in institutions and bodies, as defined in Article 22(1)(2) of the Law.

2.4. COEC's assessments of situations

As an independent body, the Commission carries out assessments of situations involving potential conflicts of interest.

In 2023, the case of reimbursement of dwelling rental costs was investigated. The

Commission noted that, in order to avoid such risks, agreements on the rent of a dwelling or a part of a dwelling for reimbursement purposes should not be concluded with close relatives of civil servants and other natural or legal persons who may have a conflict of interests.

Transactions of this nature with close persons of employees of an institution (especially directors) will always raise doubts in the public mind as to their transparency and reasonableness and, therefore, in the opinion of the COEC, are only possible in exceptional circumstances.

The procedures for the reimbursement of the costs of renting a dwelling should involve the person responsible for the supervision and control of the adjustment of public and private interests, who, in accordance with the procedures laid down by the institution, would carry out an assessment of the specific situation and would make appropriate proposals on the control of potential risks. These procedures should be organised in such a way as to exclude the participation of the person making the request for reimbursement (including persons under his authority).

2.5. Lobbying activities

In the context of the provisions of the LAL, it is important that the specific lobbying activities carried out are disclosed to the public. During the reporting year, 60 persons, including 41 legal persons, were included in the list of lobbyists, bringing the total number of lobbyists to 348.

During the reporting year, lobbyists submitted 635 declarations on SKAIDRIS. The Lithuanian Business Confederation was the most active lobbyist (96 declarations

submitted). Lobbyists mainly aimed to influence the areas of healthcare (Law on Pharmaceuticals of the Republic of Lithuania), economy and innovation (Law on Public Information of the Republic of Lithuania), energy (Law on Renewable Energy of the Republic of Lithuania), rural affairs and agriculture (Coordination of the Strategic Plan of Agriculture and Rural Development of Lithuania for 2023-2027), and finance and banking (Law on Personal Income Tax of the Republic of Lithuania).

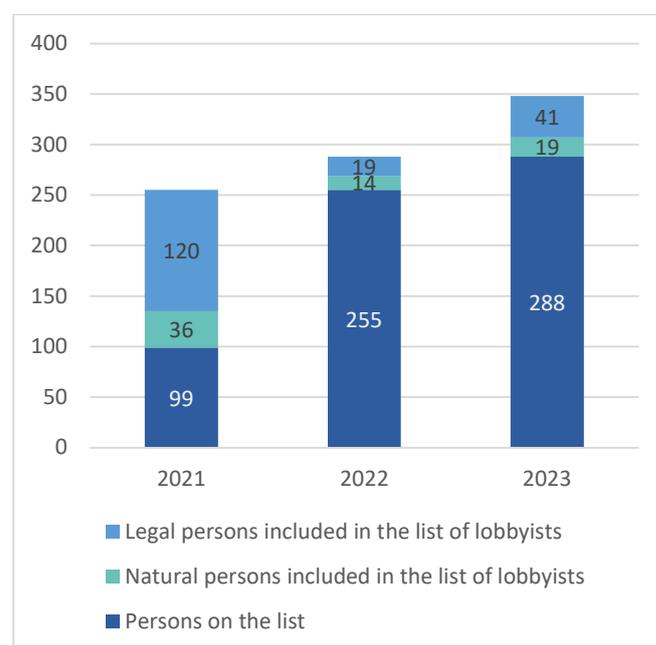


Figure 5. Number of lobbyists in 2021-2023

Under the current procedure, not only the lobbyist but also the person who has been influenced by the lobbyist must declare lobbying activities. This means that both sides of the lobbying process disclose to the public the fact of “persuasion”. In the reporting year, 157 declarations by lobbyists and their influencers were “cross-referenced” in SKAIDRIS. The public sometimes wonders why the number of declarations submitted by lobbyists and the number of declarations “cross-referenced” do not coincide. That is because the influence exerted by lobbyists

does not always reach the specific person. For example, if a lobbyist has submitted proposals to a Seimas committee or group, the lobbyist must declare the lobbying activities carried out, while members of the committee do not need to submit transparency declarations.

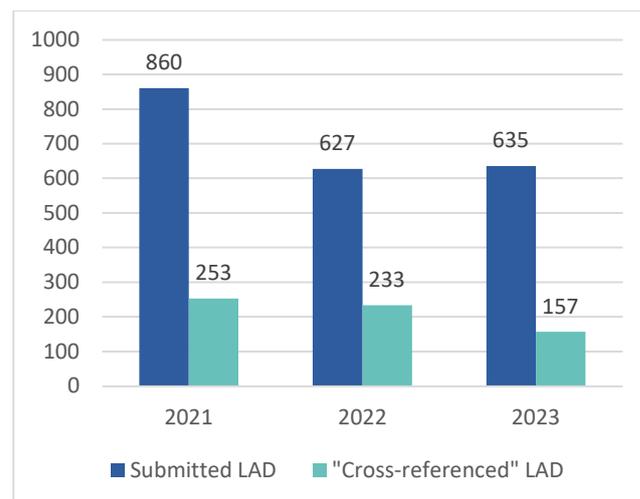


Figure 6. Lobbying declarations in 2021-2023

	2021	2022	2023
Natural persons included in the list of lobbyists	36	14	19
Legal persons included in the list of lobbyists	120	19	41
Lobbyists' LAD, i.e. influence on legislation	860	627	635
Episodes of lobbying activities (cross-declaration)	253	233	157
LAD of influencers, i.e. the annual report	170	139	7
Influencers (Legal persons)	42	6	27

Table 5. Number of lobbyists, influencers and their submitted declarations in 2021-2023

Modernisation of SKAIDRIS

Improvements to the Transparent Legislative Processes Information System (hereafter – SKAIDRIS) intended for the selection of information were implemented in 2023 – practice has shown that fearing possible sanctions, both lobbyists and influencers have declared information that is not required to be declared under the Law on Lobbying Activities (e.g. mere invitations to meet to discuss an issue, descriptions of general problems, etc., but no specific proposals for legislation or draft legislation). Improvements

to the mechanisms for monitoring declared lobbying activities have included the updating of lobbying transparency declarations and the simplification of cross-declaration for persons who have been subject to lobbying influence.

The aim is that these improvements to SKAIDRIS will contribute to a more user-friendly and qualitative declaration of the lobbying activities carried out and experienced, and provide the public with better and more specific information.

What has changed for a lobbyist:

- ✓ Lobbyists will first have to answer four screening questions when submitting their lobbyist transparency declaration.
- ✓ The submitted lobbyist transparency declaration will be made public after an assessment by a COEC employee as to whether the actions described in the declaration are consistent with lobbying.
- ✓ If the lobbyist transparency declaration is consistent with lobbying activities, it shall be approved and made public. Otherwise, the declaration shall be rejected without being made public. In both cases, the lobbyist gets a notification.
- ✓ In cases where it is unclear whether or not lobbying is involved, a COEC employee shall contact the lobbyist.

What has changed for the person who has been lobbied:

- ✓ After a lobbyist transparency declaration has been approved by the COEC, a person who has been influenced will receive a notification that he has been lobbied. Having opened the declaration, he will only have to confirm that such a case has occurred. There will be no need to complete a new declaration.
- ✓ It shall still be possible to file a declaration on lobbying influence on own initiative (without waiting for the lobbyist to do so first).

2.6. Inclusion of positions in the lists of declarants

Provisions of the LAPPI regarding the declaration of private interests, disqualification and restrictions on the acceptance of gifts and favours are also applicable to those employees of public sector entities whose list of duties is approved by the head of the institution or body in agreement with the COEC. This list may include positions whose functions are related to the management of state or municipal budgets and state monetary funds, the management, use and disposal of state and municipal property, the preparation and adoption of administrative decisions or the provision of public services. Pursuant to this provision of the LAPPI, the **Commission approved the inclusion of nearly 800 positions in the list of declarants.**

This demonstrates that managers of public sector organisations assessing the potential risks of conflicts of interest responsibly and that their actions contribute to enhancing the impartiality of public sector activities and promoting trust in public sector organisations.

2.7. Checks on persons

Pursuant to provisions of the Law on Prevention of Corruption and in response to the requests received, the COEC provided the available information on the violations of the provisions of the LAPPI and the LAL committed by applicants for the positions in the public service. In the reporting year, the **COEC provided information on 5214 persons** to the Special Investigation Service, the Prison Department, the State Border Guard Service, the Customs Department and the Dignitary Protection Service.

Key findings on preventive activities

- The COEC team provides an expert opinion to inquiries within 3 days.
- Public sector organisations are increasingly focusing on transparency within the organisation and aim to include more employees in the pool of declarants under the provisions of the LAPPI. This means that these individuals disclose private interests, have to manage risks of conflicts of interest and are subject to restrictions on accepting gifts.
- Distance learning tools on declaring interests and lobbying have been developed and are available to organisations' compliance officers and all declarants.
- Compliance tests have been developed for target groups, taking into account their role in creating transparency in the organisation, i.e. the organisation's managers and compliance officers.
- A form of advance written recommendations is prepared. This is an important conflict of interest management tool to assess and manage risks before a conflict arises.
- The SKAIDRIS system for transparent legislative processes has been updated, simplifying the declaration of lobbying activities and significantly facilitating the "cross-declaration" procedure.

3. International cooperation

During 2023, the COEC has actively contributed to the work of international organisations, strengthening its capacity and sharing its experience not only within the EU but also globally.

Organisation for Economic Co-operation and Development (OECD) and the European Partners Against Corruption (EPAC/EACN)

The networks were established in 2004 and 2008 respectively and currently bring together around 120 anti-corruption institutions from various Council of Europe and European Union (EU) Member States

Network for Integrity

It is a network of organisations around the world concerned with the integrity, transparency and ethics of public officials, with institutions in Europe, the Americas, Asia and Africa. Through the development and promotion of an international culture of integrity and the organisation of events, the Network enables its members to exchange good anti-corruption practices and experiences.

European Network on Ethics in Public Service (ETET)

The European Integrity Network (EIN) was set up in 2022 by the Chief Official Ethics Commission (COEC), together with ten other bodies responsible for transparency in the public sector in the European Union (EU) Member States. The ETET was initiated by France, which currently holds the Presidency of the Council of the European Union. By signing the ETET Founding Declaration in Paris, the countries agreed to strengthen the independence of the institutions operating in the field of official ethics,

their expertise and the capacity to pursue their mission in the public interest, also agreeing to develop joint initiatives, to exchange best practices and experiences, to implement mutual assistance on ethics issues and to strive to become an expert body capable of representing ethics issues at EU level.

Network of European countries that regulate lobbying activities

In 2018, the Chief Official Ethics Commission was invited to participate in the preparatory meeting of the European Network of Countries Regulating Lobbying. The aim of the discussion, which brought together representatives from Ireland, France, Austria, the United Kingdom (Scotland and England), the European Commission and the European Parliament, was to share experiences in the field of lobbying regulation and suggestions on how to ensure better control of lobbying, as well as to set up an informal network of European countries with lobbying registers, which would meet annually to discuss the problems encountered in the supervision of lobbying and to suggest the most effective ways of solving them. Twelve institutions from different European countries are currently members of the network, which also includes the Chief Official Ethics Commission. Members regularly share updates and meet once a year to discuss national challenges and opportunities in lobbying regulation.

4. Internal administration of the COEC

Currently, the COEC is composed of 5 members – civil officers and 22 members of the Secretariat – civil servants and persons hired under employment contracts.

Since 2016, the Seimas has paid insufficient attention to the activities of the COEC and the challenges it faces in ensuring high ethical standards in the public sector:

- The number of civil servants (employees) of the COEC has remained essentially the same

since 2016, although the number of assigned functions has increased a few times.

- In 2016 and 2021, the Board of the Seimas increased the number of positions to 8, but they did not receive any funding. The Seimas approved 35 positions.

- In 2022, additional functions (new Law on Lobbying Activities, early resolution of disputes (formerly a judicial function), etc.)

were assigned by the Seimas, but no funding was allocated for their implementation.

- As of 2021, the COEC has been administering new IT systems (PINREG, SKAIDRIS), but it does not have sufficient human resources to ensure their quality performance, design functionality, and proper analysis of the available data.

In 2023, only the basic functions of the COEC (conducting investigations, responding to inquiries) were ensured. Active preventive activities are almost non-existent or rather delayed.

With the human resources available, the Commission can only carry out its core

functions, such as examining reports, inquiries, complaints, providing general advice, administering PINREG and the core functionalities of SKAIDRIS, and international representation.

Other critical functions such as data analytics, provision of preliminary written recommendations, educating the public sector and the public on the topics of conflict of interest and lobbying, continuous mentoring of senior management and compliance officers, and assessing the compliance of organisations are largely absent due to a lack of human resources and of motivating remuneration for current employees.

	2020	2021	2022	2023
Public officials (COEC members)	5	5	5	5
Civil servants	14	18	17	16
Employees hired under employment contracts	9	8	5	6
Total	28	31	27	27
Number of positions	35	35	35	35
Lack of financially covered positions	7	4	8	8

Table 6. COEC human resources in 2020-2023