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

Implementation Status by June

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

Target	Measures taken to meet targets	Principal responsibility Other bodies	Schedule (implemented)	Resource	Assessment of implementation by June 2024
1. Reinforcement and clarification of the official structures for preventing and combating corruption and improvement of cooperation between the parties involved					
1.1.1. Coordination and cooperation to be enhanced	Set up an operational cooperation group to enhance the fight against corruption and to improve operational cooperation between the authorities	National Prosecution Authority, National Bureau of Investigation / Helsinki Police Department, Finnish Competition and Consumer Authority, Finnish Tax Administration,	2021	Carried out as part of official duties	NOT STARTED

		Financial Intelligence Unit, Customs			
	Ministries appoint contact persons for the prevention and combating of corruption to draw attention to corruption issues within their own organisation, to monitor the implementation of the Anti-Corruption Strategy and report on it to the Ministry of Justice, which supports ministries in anti-corruption work	Ministries	2021	Carried out as part of official duties	COMPLETED
1.1.2. Exposure of corruption offences and support for investigation	With existing structures and resources strengthen the National Bureau of Investigation's anti-corruption function, utilising existing official structures and focusing on the detection of corruption offences and support for investigation. The function is responsible for – collecting operative tips, intelligence and information and other reports on corruption, for their analysis and for bringing cases for criminal investigation on a national level, – disseminating good practices and for	Ministry of the Interior, National Police Board, National Bureau of Investigation	2021	Carried out as part of official duties	COMPLETED

	communications to make prevention successful – maintaining the operational situation awareness of the police concerning corruption, – receiving and analysing investigation requests, tips and other information from authorities, and bringing cases for criminal investigation on a national level, – coordinating the national contact person network of the police, – developing national and international cooperation between authorities and stakeholders, and improving the exchange of information jointly with the National Police Board and other police departments				
1.1.3 Development of anti-corruption activities by criminal investigation authorities	The police, the Border Guard and Customs develop anti-corruption strategies and policies that are communicated to the general public (GRECO 5, paragraph 129)	National Police Board, Border Guard, Customs	2022	Carried out as part of official duties	COMPLETED

	(i) Prepare rules/requirements for appropriate procedures for the police, the Border Guard and Customs from the perspective of integrity and anti-corruption, which are made easily accessible to the public; (ii) supplement these rules/requirements with practical implementation measures, including, in particular, confidential advisory services and special, mandatory induction and continuing training Pay particular attention to ethical management training (GRECO 5, paragraph 132)	National Police Board, Border Guard, Customs	2022	Carried out as part of official duties	COMPLETED
	Ensure that the recruitment and career advancement processes of the police, the Border Guard and Customs (i) use appropriate inspections and supervision to prevent an individual from having an inappropriate influence on the process and (ii) build internal complaint/mediation mechanisms (GRECO 5, paragraph 140)	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties	COMPLETED
	Develop a functioning system for outside employment permits for the police and organise effective monitoring of this system (GRECO 5, paragraph 151)	National Police Board	2022	Carried out as part of official duties	COMPLETED

	Develop guidance for the police, Border Guard and Customs on the requirements and procedures that officials must follow when forming private interests and taking up outside employment and when negotiating on a future employment contract, which they will enter into after working for the police, the Border Guard or Customs (GRECO 5, paragraph 152)	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties	COMPLETED
	(i) Prepare a plan on the collection of data to further improve police risk management to prevent corruption; and (ii) allow more stringent internal oversight through regular cross-checks and inspection of registers (GRECO 5, paragraph 163)	National Police Board	2022	Carried out as part of official duties	COMPLETED
	(i) Require the police, border authorities and customs authorities to report corruption and (ii) enhance, in this respect, the protection of whistleblowers (GRECO 5, paragraph 168)	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties	COMPLETED
	Organise special guidance and training on the protection of whistleblowers at all hierarchy levels in the police, the Border Guard and Customs (GRECO 5, paragraph 169)	National Police Board, Border Guard and Customs	2022	Carried out as part of official duties	COMPLETED

1.1.4 Measures aimed at ensuring that authorities acting in the criminal procedure chain have adequate means to combat corruption will be enhanced	Take steps to ensure that after the planned restructuring of the prosecution service, cases concerning foreign corruption will be referred to prosecutors with sufficient expertise and experience on the subject (OECD 4, 2a)	National Prosecution Authority	2021–2023	Carried out as part of official duties	COMPLETED
	Take steps to ensure that the resources allocated to the National Bureau of Investigation to combat foreign bribery are kept at the current level and that the prosecution service's resources are sufficient to enable prosecutors to continue to participate in the investigation of foreign bribery cases at an early stage (OECD 4, 2b)	National Police Board, National Bureau of Investigation, National Prosecution Authority	2021–2023	Carried out as part of official duties	COMPLETED
	Take steps to ensure that courts and judges dealing with foreign corruption cases have specialised expertise and experience in dealing with such cases (OECD 4, 2c)	National Courts Administration	2021–2023	Carried out as part of official duties	WELL ADVANCED
	Prepare detailed, written material for criminal investigators, prosecutors and judges (either jointly or separately) on what is required to fulfil the essential elements of a foreign bribery offence in accordance with	Ministry of Justice, National Courts Administration, National Prosecution Authority, National Police Board	2022	Carried out as part of official duties utilising the results of the Government's analysis, assessment and research activities (TEAS) project	WELL ADVANCED

	Article 1 of the Convention (e.g. OECD 4, 3a)			concerning evidence requirement analysis	
	Plan comprehensive training, using the information specified above in Recommendation 3a, for criminal investigators, prosecutors and judges on the application of the definition of foreign bribery offences (OECD 4, 3b)	Ministry of Justice, National Police Board, National Prosecution Authority, National Courts Administration	2021–2023	Carried out as part of official duties	STARTED
	Encourage prosecutors to make full use of the possibility of demanding business prohibitions in foreign corruption cases (OECD 4, 4a)	National Prosecution Authority	2021–2023	Carried out as part of official duties	STARTED
Target	Measures taken to meet targets	Principal responsibility Other agencies	Schedule (implemented)	Resource	Assessment of implementation
2. Raising awareness of corruption					
1. 2.1 General awareness of corruption (nb. the measures related to awareness raising are continuous and should be transferred to the next Action Plan)					
2.1.1. People know what corruption means and understand the damage it causes	Maintain and update the national anti-corruption website (www.korruptiontorjunto.fi) through which the public, companies and authorities receive objective, fact-based information	Ministry of Justice and the anti-corruption cooperation network and contact persons from ministries	2021–2023	Carried out as part of official duties	COMPLETED

	on corruption and reporting practices				
	Actively communicate anti-corruption actions on the websites and in the newsletters of authorities/agencies and in the media	Ministry of Justice and the anti-corruption cooperation network Agency contact persons in matters related to corruption	2021–2023	Carried out as part of official duties	STARTED
	Organise training and distribute anti-corruption and prevention materials to the branch of government of the Ministry of Education and Culture	(Ministry of Education and Culture)	2021–2023	Carried out as part of official duties	WELL ADVANCED
	Highlight the importance of the fight against corruption at various public events and special events aimed at increasing corruption awareness in conjunction with the Anti-Corruption Day	Ministry of Justice, the anti-corruption cooperation network and stakeholders	Annually/on 9 December	Carried out as part of official duties	COMPLETED
2.1.2. An effort will be made to increase the awareness of media representatives in the area of corruption and its prevention	Develop interaction between authorities and the media through new forms of cooperation	Ministry of Justice and the anti-corruption cooperation network	2021–2023	Carried out as part of official duties	STARTED

2.1.3 Increase the awareness of corruption that takes place abroad	Take steps to raise awareness of existing guidelines (e.g. OECD guidelines) and of how corruption abroad in the private sector can be tackled, including in sectors where risks are high, such as the defence industry, state-owned companies, SMEs, and in sectors for legal advice, and accounting and auditing professionals (OECD Recommendation 3, 5c)	Ministry of Justice, Ministry of Economic Affairs and Employment, Ministry of Finance, Ministry of Defence, and stakeholders	2021–2023	Carried out as part of official duties	WELL ADVANCED
2.1.4 National situation awareness of corruption will be developed and maintained	Design a monitoring method, and prepare a situation report on corruption every two years	Ministry of Justice, Police University College	2022–2023	Requires additional funding, for which an application has been submitted to the Internal Security Fund (ISF)	STARTED
2.2 Awareness of corruption and the development of expertise in combating corruption in the public sector					
2.2.1 Awareness among state, municipal and regional government officials, employees and elected officials of the forms of manifestation of corruption and its harmful effects, and of the means to combat corruption will be increased	Prepare and implement ethics guidelines on preventing and combating corruption for state and municipal officials and for other local and regional operators, including publicly owned companies	Ministry of Finance and Ministry of Justice in cooperation with other ministries	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling the Grey Economy and Economic Crime Otherwise carried out as part of official duties	WELL ADVANCED
	Launch a separate corruption and ethics website aimed specifically at officials under the national anti-corruption website	Ministry of Justice, Ministry of Finance and Prime Minister's Office	2021–2023	Carried out as part of official duties	COMPLETED

	(korruptiontorjunta.fi) that will include an online training module on corruption An effort will be made to use this training as part of the induction of new officials				
	Organise thematic training on the risks of corruption for officials, internal auditors and elected officials engaging in recruitment, zoning and land use planning, procurement, construction contracts and government grants	Ministry of Justice and other ministries Will be implemented as part of the Action Plan for Tackling the Grey Economy and Economic Crime in cooperation with stakeholders	2021–2023	Funding in part under project 1.3. of the Action Plan for Tackling the Grey Economy and Economic Crime Otherwise carried out as part of official duties	COMPLETED
2.2.2 Officials and elected officials participating in anti-corruption work have the necessary knowledge and skills required for the prevention of corruption, the fight against corruption and the investigation of corruption	Give specialised, and when necessary, joint training sessions, on corruption to special prosecutors, police officers, the staff at courts of law and the Financial Intelligence Unit	Police University College, National Prosecution Authority, Ministry of Justice, Finnish Competition and Consumer Authority, National Bureau of Investigation, National Courts Administration	2021–2023	Carried out as part of official duties	COMPLETED

	Organise training for the police and prosecution service organisations on the recovery of proceeds from corruption-related offences (OECD 4, 5b)	National Prosecution Authority, National Police Board, National Bureau of Investigation, Police University College	2021–2023	Carried out as part of official duties	STARTED
2.3 Awareness of corruption in political activities					
2.3.1 Increase the awareness of corruption among political actors	Provide material on corruption and its manifestation to political parties, new MPs and other political representatives	Parliament, Ministry of Justice	2022–2023	Carried out as part of official duties	NOT STARTED
2.3.2 Increase the awareness of corruption among ministers and senior officials in central government	Investigate the necessary measures (e.g. rules of procedure, training, guidance and advisory services, monitoring and sanction mechanisms) for increasing the awareness of senior officials in central government on corruption (GRECO, paragraph 46, 48 and 65)	Prime Minister's Office: ministers Ministry of Finance: senior officials Ministry of Finance and Prime Minister's Office: political state secretaries and special advisers (working group)	2021–2022	Carried out as part of official duties	WELL ADVANCED
	Lay down provisions on procedures for preventing and avoiding conflicts of interest situations when members of Government move to other positions	Prime Minister's Office	2021–2022	Carried out as part of official duties	WELL ADVANCED

2.4. Awareness of corruption in the private sector					
2.4.1. Steps will be taken to increase the awareness of employees of state-owned companies on corruption and the fight against corruption	State-owned companies will draw up an action plan against corruption and implement it in accordance with OECD guidelines	Prime Minister's Office (Ownership Steering Department)	2022	Carried out as part of official duties	STARTED
2.4.2. Steps will be taken to increase the awareness of companies engaged in international trade on corruption and the fight against corruption	Organise discussion events on responsible business for companies engaged in international trade; these will include a section on corruption in international business relationships, its consequences and means for its prevention. Prepare and collect guideline materials on the topic. Where possible, utilise existing structures, channels and mechanisms	Ministry of Economic Affairs and Employment, Ministry for Foreign Affairs, Ministry of Justice (in cooperation with Business Finland and key business organisations, companies and other relevant parties)	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling the Grey Economy and Economic Crime Otherwise carried out as part of official duties and in cooperation with other key parties	COMPLETED
2.4.3. Awareness of SMEs concerning corruption and anti-corruption will be increased	Continue the marketing of the anti-corruption guide prepared by the Ministry of Economic Affairs and Employment for SMEs with stakeholders and participate in the planning and implementation of training and seminars for SMEs	Ministry of Justice, Ministry of Economic Affairs and Employment, and stakeholders	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling the Grey Economy and Economic Crime Otherwise carried out as part of official duties and	WELL ADVANCED

				in cooperation with other key parties	
2.4.4. Companies and other private actors receiving development cooperation funding know what corruption means and understand the damage it causes	Organise training on responsible business practices, good administration, and statutes, conditions, restrictions and principles related to the use of discretionary government grants, including a section on the harmful effects, sanctions and prevention measures of corruption, for companies receiving development cooperation funding (Ministry for Foreign Affairs/Finnfund, etc.) and other private actors. Where possible, utilise existing structures, channels and mechanisms	Ministry for Foreign Affairs/ Finnpartnership, companies	Annually	Carried out as part of official duties	WELL ADVANCED
2.4.5. Employees at enterprises in the construction sector know what corruption means and understand the damage it causes	Offer seminars to enterprises in the construction sector that focus on corruption and cartels in the construction sector, the damage caused by corruption, sanctions for corruption and means of preventing corruption	Ministry of Justice, Ministry of the Environment, Finnish Competition and Consumer Authority, the police, the Finnish Tax Administration and stakeholders	2021–2023	Funding in part under project 1.3 of the Action Plan for Tackling the Grey Economy and Economic Crime Otherwise carried out as part of official duties and in cooperation with other key parties	STARTED

2.4.6. Parties subject to the reporting obligation under the Anti-Money Laundering Act know what corruption means and recognise its various forms	Offer training to parties subject to the reporting obligation under the Anti-Money Laundering Act and other reporting bodies on the more effective identification of corruption	National Bureau of Investigation, Regional State Administrative Agencies, Ministry of Justice, Police University College	2021–2023	Carried out as part of official duties	STARTED
2.4.7. Efforts will be made to raise awareness of corruption among parties receiving significant government grants	Take steps to increase awareness of the fight against corruption so that parties receiving government grants are familiar with the principles of good administration and the necessary processes and legislation related to the use of government grants	Ministries	2021–2023	Carried out as part of official duties	COMPLETED
2.4.8 Consideration of discretionary government grants to organisations promoting physical activity will include an assessment of how the organisations implement the principles of good administration in their activities	Add good administration that includes measures against the manipulation of sports competitions (match fixing) to the criteria for granting discretionary government grants to organisations promoting physical activity	(Ministry of Education and Culture)	2021	Carried out as part of official duties	COMPLETED
Target	Measures taken to meet targets	Principal responsibility Others	Scheduling (implemented)	Resource	Assessment of implementation
3. Increasing transparency					

3.1 Increasing transparency in official activities					
3.1.1 Transparency of decision-making will be increased in accordance with the Government Programme	Take steps to investigate and assess the appropriate implementation of the principle of openness, the problem areas in its implementation and measures that will impact these	Ministry of Justice	2021–2023	Carried out as part of official duties	COMPLETED
3.1.2 Steps will be taken to examine ways to make appointment processes of senior officials more transparent	Assess the grounds for the appointment of senior officials and examine the length of the periods in office as part of the power to appoint and, if necessary, update the relevant guidelines. Additionally, investigate the functioning of the prohibition of appeal laid down in the Act on Public Officials in Central Government	Ministry of Finance	2021	Carried out as part of official duties	COMPLETED
3.1.3. Steps will be taken to limit or prevent the use of confidential information, or other information protected by provisions limiting its disclosure, and of the related knowledge in an employment relationship or activity for personal gain or the gain of another, or to the detriment of another in situations where public	Officials dealing with exceptionally sensitive information or information with significant economic value are required to sign a non-compete agreement, making it possible to impose a non-compete period before they can take up employment with another employer (see GRECO 5, paragraph 82)	Ministry of Finance	2022–2023	Carried out as part of official duties	COMPLETED

officials leave central government for other work opportunities	Investigate possibilities to extend the same practice to regional and municipal officials				
3.2 Increasing transparency in political activities					
3.2.1. Transparency of decision-making will be improved	Prepare and adopt a transparency register (lobbying register)	Parliament prepares the legislative proposal, and the Ministry of Justice in cooperation with the register authority carry out its implementation	2020–2023	A Parliament-guided project set up by the Government, which will be carried out in close cooperation with stakeholders	COMPLETED
	In connection with the preparation of the transparency register, take steps to ensure that the good lobbying practices to be prepared will contain guidelines for increasing transparency and combating conflicts of interest	Parliament prepares the legislative proposal, and the Ministry of Justice in cooperation with the register authority carries out its implementation	2021–2023	A Parliament-guided project set up by the Government, which will be carried out in close cooperation with stakeholders	COMPLETED
3.2.2. Steps will be taken to increase the transparency of the private interests of senior officials, ministers and special advisers	With regard to all senior management (including special advisers), (i) standardise and specify the content and timing of the requirements for declarations of private interests; and (ii) consider the possibility of extending the scope of the declarations to include	Prime Minister's Office: ministers Ministry of Finance: senior officials Ministry of Finance, Prime Minister's Office: special advisers	2021–2022	Carried out as part of official duties	WELL ADVANCED

	information on gifts, financial interests, secondary employment and debts of a spouse and dependent family members above a certain threshold (in which case, this information of close relatives may not necessarily need to be disclosed) (GRECO 5, paragraph 95); in addition, consider whether information on declared interests should be added to the transparency register				
	Introduce a government gift register to which information on gifts received by ministers will be added	Prime Minister's Office	2021	Carried out as part of official duties	COMPLETED
3.3. Increased transparency in public procurement					
3.3.1. The procurement process will be made more transparent and healthy competition will be enhanced	Examine means for promoting access to information on direct procurements	Ministry of Economic Affairs and Employment, Finnish Competition and Consumer Authority	2021–2023	Carried out as part of official duties	STARTED
	Investigate ways of effectively preventing conflicts of interest and private interests in decision-making in contracting entities that are limited liability companies	Ministry of Finance, Ministry of Economic Affairs and Employment	2021–2022	Carried out as part of official duties	STARTED

	Investigate means to improve access to information for contracting entities in connection with procurements	Ministry of Finance, Ministry of Justice, Ministry of Economic Affairs and Employment	2021	Funding in part under project 3.1 of the Action Plan for Tackling the Grey Economy and Economic Crime Otherwise carried out as part of official duties	WELL ADVANCED
	Investigate the possibility of requiring declarations of private interests from persons involved in the preparation of procurements or other means of preventing conflicts of interest	Ministry of Finance	2020–2022	Carried out as part of official duties	WELL ADVANCED
3.4. Promoting transparency in business					
3.4.1. Operators have as much information as possible on the management of corporate responsibilities	Investigate the possibility of setting up a public service from which the general public, companies and authorities can easily and cost-effectively verify that companies are fulfilling their statutory obligations as employers and contracting parties. Running this type of public service would require that information on	Ministry of Finance/Tax Administration Will be implemented as part of the Action Plan for Tackling the Grey Economy and Economic Crime	2021–2022	Resourcing will be from the funds allocated to the Action Plan for Tackling the Grey Economy and Economic Crime	WELL ADVANCED

	companies included in the certificate for the fulfilment of obligations be made public by law				
3.4.2 Transparency of publicly owned companies will be increased	In accordance with the Government Programme, take steps to assess whether the scope of the Act on the Openness of Government Activities should be extended to include legal persons owned or controlled by the public sector. In the assessment, take into account the market impacts of the different options and the effects on the competitive position of companies	Ministry of Justice	2021–2023	Carried out as part of official duties	WELL ADVANCED
Target	Measures taken to meet targets	Principal responsibility Others	Scheduling (implemented)	Resource	Assessment of implementation
4. Promoting the exposure of cases of corruption					
4 .1. Promoting the exposure of corruption cases in election and party funding					
4.1.1. The prerequisites for detecting the links between election and party funding and corruption will be improved	Methods will be sought to further increase the transparency of the election funding received by local political organisations	Parliament will investigate	2020–2022	A Parliament-guided project set up by the Government	COMPLETED

	Investigate the need for a legislative amendment that would increase the right of the National Audit Office to obtain from third parties necessary comparative information for the performance of control or audit tasks free of charge, where necessary	Parliament will investigate	2020–2022	A Parliament-guided project set up by the Government	COMPLETED
	Take steps to determine whether it would be possible to draft a legislative amendment according to which all candidates in non-municipal elections should open a separate bank account as a campaign account and that donations addressed to the candidate for election should be paid to that election account	Parliament will investigate	2020–2022	A Parliament-guided project set up by the Government	COMPLETED
4.2. Promoting the exposure of corruption cases in public activities					
4.2.1. Corrupt practices in public procurement processes will be detected more effectively	Improve the competence of persons working with public procurement in procurement processes and procurement legislation by increasing training as part of the activities of the Public Procurement Advisory Unit and the implementation of the objectives related to increasing the competence of the Hankinta-Suomi project	Ministry of Economic Affairs and Employment, Ministry of Finance	2021–2023	Carried out as part of official duties	COMPLETED

	Organise training for internal auditing in municipalities to support increased awareness	Principal responsibility: Ministry of Justice Others: Finnish Competition and Consumer Authority, Tax Administration, Association of Finnish Local and Regional Authorities, National Bureau of Investigation	2021–2023	Resourcing will be from the funds allocated to the Action Plan for Tackling the Grey Economy and Economic Crime	COMPLETED
4.2.2. The prerequisites of internal audits to detect corruption will be improved	Draw up and implement guidelines on corruption risks for internal audits of central government to strengthen the identification of corruption risks	Ministry of Finance	2022	Carried out as part of official duties, will possibly require separate financing	COMPLETED
	Examine and implement methods for strengthening the autonomy of public sector internal audits	Ministry of Finance	2022	Carried out as part of official duties	COMPLETED
	Examine and implement methods to ensure the adequate access of public actors to information for the internal auditing	Ministry of Finance	2022	Carried out as part of official duties	COMPLETED
4.3. Facilitating easier means for reporting on suspected corruption and for the protection of the persons submitting a report					
4.3.1. Information will be produced on the implementation of the EU	Prepare guidelines on reporting channels, reporting practices and protecting whistleblowers	Ministry of Justice	2022–2023	Funding has been applied for from the Internal Security Fund;	COMPLETED

Directive on the protection of whistleblowers				Otherwise carried out as part of official duties	
	Organise general communication, advice and guidance on reporting and the protection of whistleblowers, and organise training for those receiving and processing reports and for the authorities and companies participating in the protection	Ministry of Justice, external reporting channel	2022–2023	Carried out as part of official duties	WELL ADVANCED
4.3.2. The reporting of suspected corruption by officials to the competent authority will be further facilitated	Examine the possibility of obligating officials to report suspected cases of bribery that they observe within the scope of their own duties to the competent authority (OECD 3, xi)	Ministry of Finance	2021–2023	Carried out as part of official duties	WELL ADVANCED
	Investigate the role, operating methods and tools of public supervisory authorities, with the aim of strengthening their autonomy in relation to those whose activities they supervise and promoting reporting observations related to corruption at one's own initiative to the criminal investigation authorities	Ministry of Finance	2021–2022	Carried out as part of official duties	COMPLETED
	Examine the possibility of extending liability for acts in office to cover municipal and state majority-owned companies	Ministry of Justice and Ministry of Finance	2020–2021	TEAS project under way	COMPLETED

4.4 Enhancing the identification and exposure of foreign bribery, and international anti-corruption work					
4.4.1 The ability of authorities to identify corruption will be improved	Authorities prepare guidelines for their personnel operating abroad on how to identify corruption and how to proceed when corruption is detected	Ministries	2021	Carried out as part of official duties	WELL ADVANCED
	The Ministry for Foreign Affairs prepares guidelines for all officials posted abroad; the guidelines must require reporting on foreign bribery, provide information on different reporting channels and provide instructions on how foreign bribery can be identified. (OECD 4, 1a) In addition, Finnish foreign missions monitor the corruption situation in their host countries as part of a wider operating environment and assess its impact on Finland's operations in the country	(Ministry for Foreign Affairs)	2021	Carried out as part of official duties	WELL ADVANCED
	In the planning, implementation and monitoring of development cooperation, improve existing risk management guidelines and processes	(Ministry for Foreign Affairs)	2021	Carried out as part of official duties	COMPLETED

	This work will be supported by a risk management policy for development cooperation that is due to be completed during the first half of 2021				
Target	Measures taken to meet targets	Principal responsibility Other agencies	Scheduling (implemented)	Resource	Assessment of implementation
5. Examination of the functioning of legislation relevant to the prevention of corruption, and the development of legislation					
5.1. Ensure that legislation related to the fight against corruption is sufficiently effective and appropriate and that legal protection requirements are met					
5.1.1 Assessment of criminalisation and necessary amendments	Submit a legislative proposal on the criminalisation of trading in influence to Parliament	Ministry of Justice	2021–2023	Carried out as part of official duties	STARTED
	Increase the size of corporate fines (OECD 4, 4c)	Ministry of Justice	2021–2022	Carried out as part of official duties	STARTED
	Investigate whether the provisions under chapter 30 of the Criminal Code on bribery offences in business should be amended so that the provisions related to bribery offences in public office and in business are more similar	Ministry of Justice	2022–2023	The measure requires additional funding Financial repercussions to be investigated	COMPLETED
	Examine the adequacy of current regulation in the fight against competitive manipulation	Ministry of Justice	2022–2023	The measure requires additional funding	NOT STARTED

				Financial repercussions to be investigated	
5.1.2 Implementation of the Whistleblower Directive	Implementation of the EU Directive on the protection of whistleblowers	Ministry of Justice	2020–2023	Carried out as part of official duties	COMPLETED
5.1.3 Determine the possible need to develop the ministerial responsibility system	Examine the possible need to develop the regulation concerning the ministerial responsibility system (e.g. GRECO 5, paragraph 109)	Ministry of Justice and Prime Minister's Office in cooperation	2022–2023	The measure requires additional funding	WELL ADVANCED
5.1.4 Effective recovery of criminal proceeds in cases of corruption	Examine in the light of case law, the effectiveness of current regulation in the recovery of criminal proceeds in bribery offences (e.g. OECD 4, 5a)	Ministry of Justice, relevant authorities	2021–2023	Carried out as part of official duties	WELL ADVANCED
Target	Measures taken to meet targets	Principal responsibility Other agencies	Schedule (implemented)	Resource	Assessment of implementation
6. Promotion of research related to corruption and its prevention					
6 .1. Increasing and utilising research data related to corruption					
6.1.1. Carry out research projects that will provide information on the nature and extent of corruption at national and international level	Implement a project promoting the measurement and identification of corruption and utilise the results of the project in measuring and identifying national corruption	Ministry of Justice, TEAS project	2022–2023	TEAS project money	COMPLETED

	Carry out a joint Nordic research project on the links between corruption and money laundering in international business	Nordic Council of Ministers, Ministry of Justice, Police University College	2021–2022	Funded by the Nordic Council of Ministers	COMPLETED
	Analysis and international comparison of evidence requirements in connection with bribery offences	Ministry of Justice	2021–2022	TEAS project, funding approved on 5 November	COMPLETED