



Secretariat of the Group of States against Corruption (GRECO)
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France

**Ministry of the Interior and
Kingdom Relations**

Turfmarkt 147
2511 DP The Hague

Our reference
2024-0000757882

Your reference

Date 30 September 2024
Subject Situation report of the Netherlands - 5th Evaluation Round

Dear Sir/Madam,

At its 81st Plenary meeting (December 3 – December 7, 2018), the Group of States against Corruption (GRECO) adopted the Evaluation Report on the Netherlands in the fifth evaluation round. In the Dutch context, the fifth round regards ministers and state secretaries (part 1) and the National Police of the Netherlands (NPN) and the Royal Netherlands Marechaussee (KMar) (part 2).

In the fifth round evaluation report, GRECO addressed 16 recommendations to the Netherlands and asked the Head of delegation of the Netherlands to submit information regarding the implementation of the recommendations by 30 June 2020. This deadline was extended by GRECO to 30 September 2020 due to the COVID-19 pandemic.

During the 87th Plenary meeting (March 22 – March 25, 2021), GRECO discussed and adopted the Compliance Report of the Netherlands in the fifth evaluation round. In the compliance report, GRECO concluded that the Netherlands had satisfactorily implemented none of the sixteen recommendations contained in the Fifth Round Evaluation Report. Eight recommendations were partly implemented, and eight recommendations were not implemented. GRECO invited the Head of delegation of the Netherlands to submit additional information regarding the implementation of all recommendations by 30 September 2022. GRECO informed the Netherlands that the deadline for the additional information was extended to the end of December 2022.

During the 94th Plenary meeting (June 5 – June 9, 2023), GRECO discussed and adopted the Second Compliance Report of the Netherlands in the fifth evaluation round. In the second compliance report, GRECO concluded that the Netherlands had satisfactorily implemented seven of the sixteen recommendations contained in the Fifth Round Evaluation Report. Seven recommendations were partly implemented, and two recommendations were not implemented. GRECO asked the Head of delegation of the Netherlands to provide a report on the progress in implementing the outstanding recommendations by 30 June 2024. GRECO informed the Netherlands that the deadline for additional information was extended to the end of September 2024.

With this letter I provide you with the information on the follow-up and relevant actions taken in the Netherlands since the adoption of the second compliance report.

1. Preventing corruption and promoting integrity in central governments (top executive functions)

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i. GRECO recommended developing a coordinated strategy for the integrity of persons entrusted with top executive functions, based on analysis of risks, aiming at preventing and managing various forms of conflicts of interest, including through responsive advisory, monitoring and compliance measures.

In recent years, multiple policies have been implemented that seek to prevent and manage various forms of conflicts of interest for candidate-ministers and -state secretaries. The policies address separate phases of the candidate-ministers and -state secretaries time in office, which the following paragraphs will elaborate on. First is the self-assessment risk analysis on the topic of integrity for candidate-ministers and -state secretaries prior to taking office. Secondly, the Code of Conduct for members of the government during their time in office. Thirdly, a proposed bill regarding jobs that ministers and state secretaries take up after they leave government, which contains a two year lobbying ban, a revolving door ban and an obligation to request independent advise on the acceptability of entering into a new employment.

Prior to taking office, candidate-ministers and -state secretaries complete a self-assessment risk analysis on the topic of integrity.¹ With the introduction of the self-assessment, prospective members of the government examine possible integrity risks and other vulnerabilities prior to their accession to the government. During the formation of the government, each candidate-minister and -state secretary talks with the formateur² to examine whether there is any impediment in the candidate's past or present to accepting the position in question.³ The self-assessment risk analysis on integrity is used during this conversation between the candidate-minister or -state secretary and the formateur. The government sees the self-assessment first and foremost as a basis for a more coordinated risk-oriented strategy, in accordance with the recommendation.

While in office, the Code of Conduct for Members of Government⁴ applies to ministers and state secretaries. Regarding conflicts of interest, the code of conduct contains rules on the integrity risk analysis prior to taking office, ancillary positions, gifts, the use of public funds, financial interests and trading in securities, contact with third parties, positions after leaving office, and presence at official occasions and (commercial) (sport)events. Regarding ancillary positions, the Code of Conduct states that prior to being sworn into office, a prospective member of government shall resign all ancillary, both paid and unpaid, positions. Additionally, it states that while in office, a member of government shall not engage in any outside activities. Regarding gifts received by the member of government, the Code of Conduct states that each gift with a value that exceeds 50 EUR should be registered with and stored by the protocol bureau of their

¹ [Self-Assessment risicoanalyse integriteit kandidaat-bewindspersonen | Formulier | Rijksoverheid.nl](#)

² [Duties of the formateur | House of Representatives](#)

³ [Kamerstuk 28754, nr. 1 | Overheid.nl > Officiële bekendmakingen \(officielebekendmakingen.nl\)](#)

⁴ [Gedragcode bewindspersonen | Rapport | Rijksoverheid.nl](#)

respective ministry. Gifts made to the partner of the member of government could also affect the integrity of the member of government, and therefore the aforementioned rule also applies to gifts received by the partner of a member of government. With respect to control rights concerning relevant financial or business interests, a prospective member of government either renounces them entirely or finds an accepted solution and reports this to the formateur and prime minister. The code of conduct contains definitions of both relevant financial or business interests, as well as accepted solutions. While in office, a member of government will not create relevant financial or business interests. If, through circumstances, a member of government acquires relevant financial or business interests while in office, he/she shall choose an accepted solution and report this to the House of Representatives.

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With respect to ministers taking on new jobs after they leave government, a bill was submitted to the House of Representatives in Spring of 2024.⁵ This proposed bill contains, for a period of two years after the resignation of ministers, a lobbying ban, a revolving door ban and an obligation to request independent advice on the acceptability of entering into a new employment. This independent advice is provided by the Advisory Board on the Legal Status of Political Officeholders (Adviescollege Rechtspositie Politieke Ambtsdragers). This Advisory Board is separate from politics and is completely independent.⁶ This proposed bill would codify into law the measures that are already set out in the letter to Parliament of 29 November 2021.⁷ The members of the most recent outgoing cabinet have agreed and publicly stated that, in anticipation of the law's enactment, they will already comply with the bill's rules.⁸

ii. GRECO recommended that a consolidated code of conduct for persons entrusted with top executive functions be developed, complemented with appropriate guidance regarding conflicts of interest and integrity related matters (e.g. gifts, outside activities, third party contacts, lobbying, etc.) and made easily accessible to the public; and (ii) that such a code be coupled with a mechanism of supervision and sanctions.

The Fifth Round Second Compliance Report concluded that the first part of the recommendation has been dealt with in a satisfactory manner.

As regards the second part of the recommendation, the Council of State was asked in 2022 for advice on a mechanism of monitoring and sanctioning.⁹ The Council of State concludes that from a constitutional point of view, there is no objection to the establishment of a committee charged with *internal* supervision and enforcement. The Council of State acknowledges, however, that the internal

⁵ <https://www.tweedekamer.nl/downloads/document?id=2024D18103>

⁶ [Instellingsbesluit-Adviescollege-Rechtspositie-Politieke-Ambtsdragers.pdf \(adviescollege-rpa.nl\)](#)

⁷ [Kamerbrief over uitbreiding integriteitsbeleid voormalige bewindspersonen | Kamerstuk | Rijksoverheid.nl](#)

⁸ [Wetsvoorstel 'regels vervolgfuncties bewindspersonen' - Adviescollege RPA \(adviescollege-rpa.nl\)](#)

⁹ [Samenvatting voorlichting sanctionering gedragscode voor bewindspersonen - Raad van State](#)

nature of such a committee places limitations on its positioning and powers. The Council of State argues that if the committee were to handle complaints from third parties as well, it would no longer exclusively conduct internal supervision, which in turn could give rise to constitutional questions. The Council of State argued that establishing an authority charged with external supervision and enforcement of integrity rules for ministers would be a profound change to the constitutional system. It could significantly affect the position of ministers, the prime minister and parliament and their mutual relations, and a permanent authority would require an amendment to the Constitution. An authority that could impose sanctions (such as a fine) on ministers would be in conflict with the Constitution, the Council of State argues, as it would interfere with parliament's autonomy to pass judgment on the functioning and responsibilities of ministers.

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The Council of State, in its advice, argues for a broader approach that does justice to the moral dimension of integrity, which requires a clear and orderly normative framework. The Council of State mentions that the Council of Europe's recommendation that the Netherlands draw up an 'integral' integrity code has important added value. It argues that efforts should be made to develop a more comprehensive integrity system, focusing on training, risk analysis, confidential counsellors and ethical leadership. As political leaders, ministers have an exemplary role. Finally, for integrity in practice and to keep integrity rules 'alive', it is very important that ministers discuss integrity issues and dilemmas regularly, openly and in a safe setting. The prime minister, as chair of the council of ministers, plays a central role in this. The information provided under recommendation i, the appointment of two independent confidential counsellors for ministers (see recommendation iii), and the intention to organise a (training) session on integrity with the Council of Ministers (see recommendation iii) contribute to a culture in which integrity issues can be discussed.

The government of the Netherlands, in accordance with the advice by the Council of State, does not see any room to implement an external or internal monitoring and sanctioning mechanism. The government considers the implementation of an external or internal monitoring and sanctioning mechanism undesirable for the reasons mentioned by the Council of State.

iii. GRECO recommended (i) establishing confidential counselling to persons entrusted with top executive functions on integrity related issues, conflicts of interest etc.; and (ii) raising the awareness of integrity matters among persons entrusted with top executive functions, including through training at regular intervals.

In the Fifth Round Second Compliance Report, GRECO took note of the encouraging measures that were underway regarding recommendation iii. The first measure was that, in a parliamentary letter, the Minister of the Interior and Kingdom Relations had announced that the government would appoint a confidential counsellor on integrity for members of the government. In March 2024, the cabinet appointed two former ministers as confidential counsellors.¹⁰

¹⁰ [Kamerstuk 28844, nr. 272 | Overheid.nl > Officiële bekendmakingen \(officielebekendmakingen.nl\)](#)

Members of the government can consult them to discuss integrity questions/issues they encounter in their position. Everything that is exchanged between the confidential counsellor and the minister/state secretary remains confidential. Ministers and state secretaries remain responsible for their own actions at all times, even when they consulted the confidential counsellor.

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Regarding confidential counselling for political assistants, they are subject to the same rules (i.e., the Central Government Code of Conduct, GIR) as any other civil servant. Therefore, political assistants can make use of the confidential counselling that is provided to all civil servants.¹¹

The second part of the recommendation addresses raising the awareness of integrity matters among persons entrusted with top executive functions, including through training at regular intervals. Due to the demissionary¹² (caretaker) status of the previous cabinet during the second half of 2023 and first half of 2024, no integrity training has yet taken place. However, during a Council of Ministers of the aforementioned demissionary cabinet, attention was paid to the relevant rules that ministers should observe when seeking a follow-up position. By now, there is a new government. The intention is to organise a session with the ministers in the fall of 2024. During this session, the importance of integrity in government will be emphasised, and integrity dilemmas will be discussed. The preparations for this session, which can be considered a training, have already begun. A former minister, not being one of the two confidential counsellors, will supervise the session. The two confidential counsellors will attend the session and explain their role and availability to members of the new government.

iv. GRECO recommended (i) introducing rules and guidance on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence governmental processes and decisions, and (ii) increasing the transparency of contacts and subject matters concerning lobbying of persons who are entrusted with top executive functions.

In the Fifth Round Second Compliance Report, art. 3.6 of the Code of Conduct for members of government was discussed. Art. 3.6 states the following: a member of government shall pursue transparency in their contact with third parties, a member of government shall provide insights into their agenda arrangements by publishing the agenda on the website of the government, and a member of government shall be aware of their private contacts and where these contacts may pose an integrity risks. In June 2023, the implementation guideline on the public agenda of ministers was updated,¹³ which has as a starting point “publicly available, unless”. The legitimate grounds for exception of publication are listed in the guideline. Each appointment to be published (with the exception of the ministerial council and subcouncils) shall include at least the subject and an

¹¹ [Gedragcode Integriteit Rijk | Richtlijn | Rijksoverheid.nl](#). See art. 8.4, p. 25.

¹² A cabinet becomes demissionary when the cabinet or the prime minister has requested resignation from the King. A demissionary cabinet continues to govern until there is a new cabinet. Only pending matters are handled. The outgoing cabinet does not deal with politically sensitive (controversial) issues. The Senate and House of Representatives determine which topics are controversial. See [Kabinetsformatie | Regering | Rijksoverheid.nl](#)

¹³ [Uitvoeringsrichtlijn Openbare agenda bewindslieden | Rapport | Rijksoverheid.nl](#)

explanation of the appointment, as well as a contact person in case more information is desired.

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The Netherlands is committed to continuously improving the public agendas of ministers as well as improving lobby paragraphs in the explanatory memoranda of legislative processes. The public agendas of ministers and lobby paragraphs de facto fulfil the underlying idea of a lobby register: offering insights into the contacts with third parties (transparency) and offering insights into the incorporation of input from third parties (accountability). A professor is currently conducting an evaluation of whether the aforementioned improvements are sufficiently effective. The evaluation is expected to be completed by the end of September 2024. Depending on the results and recommendations of this evaluation, the cabinet will consider whether a lobby register should still be considered.

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During the past period, an assessment has been conducted to see which elements of lobby registers from other countries would be effective and feasible in the Dutch context. This assessment was conducted so that, should a decision be made to introduce a lobby register in the Netherlands for members of the government, certain preparatory work has already been done. Naturally, close attention is also paid in this context to proposals by the European Commission to promote transparency and combat covert influence.

v. GRECO recommended that a requirement of ad hoc disclosure be introduced in respect of persons entrusted with top executive functions in situations of conflicts between private interests and official functions, when they occur.

Implemented satisfactorily.

vi. GRECO recommended introducing general rules dealing with post-employment restrictions before persons entrusted with top executive functions seek new employment in the private sector and/or are about to enter into such employment after their termination of functions in the public sector.

In the spring of 2024, the then-sitting cabinet submitted a bill to the House of Representatives on rules for ministers and state secretaries taking on new jobs after they leave government.¹⁴ This bill codifies into law the measures introduced in the parliamentary letter on post-employment measures for former members of the government,¹⁵ which was discussed in the previous situation report and the Fifth Round Second Compliance Report.

The bill contains, for a period of two years after the resignation of ministers, a lobbying ban, a revolving door ban and an obligation to request independent advice on the acceptability of entering into a new employment. The ban on lobbying in respect of former members of the government includes not only their

¹⁴ <https://www.tweedekamer.nl/downloads/document?id=2024D18103>;
<https://www.tweedekamer.nl/downloads/document?id=2024D18104>

¹⁵ [Kamerbrief over uitbreiding integriteitsbeleid voormalige bewindspersonen | Kamerstuk | Rijksoverheid.nl](#)

former ministry, but also includes adjacent policy areas in which the former member of government was actively involved while in office. The revolving door ban means that former members of government are not allowed to be employed for a period two years after the end of their term in office by either their former ministry or another ministry to the extent that they have been intensively involved with its policy areas.

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Written consideration of this bill is currently taking place. The members of the previous government have agreed and publicly stated that, in anticipation of the law's enactment, they will already comply with the bill's rules.

vii. GRECO recommended (i) that persons entrusted with top executive functions be obliged to declare their financial interests publicly on a regular basis; ii) considering including financial information on spouses and dependent family members in such declarations (it being understood that the latter information would not necessarily need to be made public) and (iii) that the declarations be subject to an appropriate review mechanism;

No new information.

viii. GRECO recommended ensuring that the procedures allowing for investigation and prosecution of abuse of office (including passive bribery) do not hamper the criminal justice process in respect of ministers/state secretaries suspected of having committed corruption related offences;

In the evaluation report of the Netherlands of the 5th evaluation round by GRECO, GRECO stated that the current legal system may form a hindrance for the prosecution of (passive) bribery of ministers and state secretaries. GRECO recommended that measures should be taken to make sure that the procedures allowing for investigation and prosecution of abuse of office (including passive bribery) do not hamper the criminal justice process in respect of ministers/state secretaries suspected of having committed corruption relations offences. The Committee for the Revision of the legislation on offences committed while in office by members of parliament and members of government (in Dutch: 'de commissie herziening wetgeving ambtsdelicten Kamerleden en bewindspersonen'), which was established to advice on the fundamental revision of the legislation for the prosecution and trial of the members of the House of Parliament and ministers and state secretaries for offences committed while in office, included the recommendation by GRECO in its advice. The committee presented her report in July 2021 to the minister of Justice and Security and the minister of the Interior and Kingdom Relations.¹⁶

The former minister of Justice and Security and the former minister of the Interior and Kingdom Relations have sent an outline to Parliament responding to the

¹⁶ *Niet boven maar in de wet. Een werkbare en faire regeling voor de opsporing, vervolging en berechting van ambtsdelicten van Kamerleden en bewindspersonen*, bijlage bij Kamerstukken II 2020/21, 34340, nr. 19, see [Niet boven maar in de wet - Een werkbare en faire regeling voor de opsporing, vervolging en berechting van ambtsdelicten van Kamerleden en bewindspersonen | Rapport | Rijksoverheid.nl](#)

advice from the Committee.¹⁷ The former ministers agree with the advice and conclude that the legislation for the investigation, prosecution and adjudication of offenses committed while in office by members of parliament and members of government is outdated and must be modernized.

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The biggest objection to the current rules is that article 119 of the Constitution places the decision on whether to prosecute a member of Parliament (MPs) or member of government for an offense committed while in office with political bodies: the government or the House of Representatives (Tweede Kamer). Another objection is that the fundamental right to appeal to a higher court is missing, as following article 119 of the Constitution MPs and members of government are tried in the first and only instance before the Supreme Court.

The prosecution and adjudication of these offenses is partly regulated in the Constitution and partly in 'ordinary' legislation. Because an amendment to the Constitution requires two readings in both houses of Parliament and therefore takes a long time and a revision of the current regulations is desirable in the short term, the committee recommends working along two 'tracks'. Track I contains proposals for changes to the investigation, prosecution and trial of offenses committed while in office within the framework of the current Constitution, track II contains proposals for amendments to the Constitution and the investigation, prosecution and trial after that constitutional amendment.

The most important recommendation for track I concerns the recommendation to charge the independent procurator general at the Supreme Court (procureur-generaal bij de Hoge Raad, hereafter PGHR) with the investigation of offenses committed while in office by MPs and members of government and also to give it the possibility to proceed with investigations ex officio. At present, the PGHR is only involved if it is instructed by the government or the House of Representatives to proceed with prosecution. An ex officio authority of the PGHR is a certain guarantee against the situation in which possible suspicions of an offense against a Member of Parliament or minister are not investigated for political reasons. The PGHR is an independent body and has a constitutionally guaranteed appointment for life (article 117 of the Constitution).

With regard to track II, the Commission recommended to delete Article 119 of the Constitution and to declare the 'normal' criminal procedure applicable, so that, just like in ordinary criminal proceedings, a trial in three instances becomes possible (trial in first instance at court in first instance, with the possibilities of appeal by the court of appeal and appeal in cassation by the Supreme Court, instead of the current trial in one instance by the Supreme Court). In addition, the committee recommends to charge the PGHR with the investigation, and the authority to order prosecution in the event of offences committed while in office.

The former ministers of Justice and Security and of the Interior and Kingdom Relations concluded that they would like to take over the advice to change the law through two tracks. The former government adopted all recommendations, except for the recommendation to delete article 119 of the Constitution. Instead, the former government proposed to change article 119 of the Constitution to include the constitutional guarantee that the PGHR decides on the order to prosecute a Member of Parliament or minister for an official offense. In the former

¹⁷ Kamerstukken II 2023/24, 34340, nr. 22, see <https://www.rijksoverheid.nl/documenten/kamerstukken/2024/04/12/tk-hoofdpijnenbrief-herziening-wetgeving-ambtsdelicten-kamerleden-en-bewindspersonen>.

governments opinion, such a crucial rule in our government system requires constitutional embedding.

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The current government prepares legislative proposals for both tracks. As stated in the government program, the government aims to publish both legislative proposals for public consultation before the end of this year, before sending both proposals to the Council of State for advice.

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2. Preventing corruption and promoting integrity of law enforcement agencies

General progress information National Police of the Netherlands (NPN):

The National Police of the Netherlands (NPN) is taking multiple measures to promote integrity within its organisation and aims to tackle corruption adequately.¹⁸ In 2023, all (sub)tasks and recommendations from the Review VIK¹⁹ have been largely implemented. This review has led to the outline of a renewed integrity system and internal investigations.²⁰ Furthermore, the temporary installed program manager has been appointed permanently as Director of Integrity in September 2023. The Director is tasked with shaping a central Integrity Department and structurally securing the renewed integrity system within the police organisation.

The development of the renewed integrity system is taking place on two tracks simultaneously. The first track consists of integrity-promoting measures such as the establishment of a national team for complex internal investigations, a new information system for improved registration and monitoring and the possibility of thematic analyses, the strengthening of the organisation's learning capacity and specific actions on staff training and retraining. Supporting methodologies such as moral deliberation (case consultation) and peer review (intervisie) are applied. The second track focuses on identifying and preventing police corruption and consists of six practical development lines (tracks). For instance, the NPN is working on improved registration and analysis of signals of specific risks and phenomena from available operational data. Based on these strategic analyses, the National Police Corruption Survey (Nationaal Beeld Politie Corruptie) will be prepared in 2024. In addition, the NPN is a member of the Internal Criminal Investigations Network (ICIN), whose primary goal is to share methods and techniques for investigating corruption within police organisations. Legal research into the nature and extent of this specific form of corruption is also being intensified and, in consultation with the Police Academy, ways in which the NPN can contribute to this are currently being explored. Finally, employees are taking resilience training courses aimed at identifying corruption through practical examples.

ix. GRECO recommended (i) that the Theme pages of the Professional Code of the National Police (NPN) be further developed with guidance, examples and lessons learned, offering adequate guidance on conflicts of interest and other integrity

¹⁸ Kamerstukken II 2020/21, 28844, nr. 220

¹⁹ [Kwaliteit interne onderzoeken Review en Vooruitblik](#)

²⁰ [Contouren vernieuwd stelsel integriteit en interne onderzoeken](#)

related situations (e.g. gifts, third party contacts, accessory activities, handling of confidential information) and that a similar instrument be established for the Royal Marechaussee (KMar); and (ii) to ensure supervision and enforcement of these instruments;

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Implemented satisfactorily.

x. GRECO recommended that the in-service training on ethics and integrity for the National Police (NPN) and the Royal Marechaussee (KMar) staff, including managers, be enhanced by developing at national level further regular training programmes as a support and complement to the existing decentralised training in the units;

Implemented satisfactorily.

xi. GRECO recommended that adequate measures and appropriate resources be allocated in order to ensure that within the National Police (NPN) vetting and screening of staff takes place at regular intervals during their entire service.

Implemented satisfactorily.

xii. GRECO recommended that the procedures in situations where gifts and advantages of a certain level have been offered/accepted be reinforced, in particular by introducing a standard format for the reporting/declaration of gifts/advantages and such offers, that these be registered and subject to supervision.

NPN: Following GRECO's recommendations, the NPN has updated its professional code in 2023 with an additional document which includes a procedure, explanation of rules, guidelines and discussion of practical dilemmas through case studies. This document is published on the NPN's intranet page and is applicable to all NPN officers, including executives.

In addition, the current Guideline on Handling Gifts²¹ is under revision and useful elements from the Code of Conduct on Integrity for Civil Servants (2020)²² will be used, among other sources, to enrich the guideline. The NPN highlights that the current guideline already contains procedures regarding valuation, the obligation to report received gifts to the superior, a formal assessment framework for executives and a clear method of returning gifts when not permitted. Finally, the introduction of a new Human Resource information system will make it easier for different types of reports to be recorded and monitored by executives. Through added education and training, the NPN will enhance the employees' willingness to report. In the light of these current developments the NPN takes the implementation of an obligatory registration system (for registering gifts with a value < €50) under consideration but still has some reluctance if such a system

²¹ Guideline on Handling Gifts. Assessment framework for employees and managers regarding the acceptance of gifts from third parties, 2014 (Translation).

²² [Gedragcode Integriteit Rijk 2020](#)

will be effective, as employees are currently prohibited from accepting gifts with a value of more than €50.

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Royal Netherlands Marechaussee (RNLM) progress report:

Previous progress and compliance reports have provided a comprehensive account of RNLM policy on accepting gifts. RNLM is aware that, in order for GRECO to consider the recommendation implemented, a gift registration system enabling the appropriate monitoring of accepted gifts must be established. In light of the arguments presented earlier, RNLM would like to emphasise that a formal registration requirement (and corresponding reporting requirement) cannot be implemented in isolation from the rest of NLD MOD, given the Defence-wide policy on gifts. The mandate for taking such action is vested in the Minister of Defence, given that RNLM is within the scope of his purview. In response to GRECO's reiterated position, NLD MOD is prepared to examine the potential value of a supervised central register alongside the existing rules of conduct. It is also looking at how the police have acted on this recommendation.

xiii. GRECO recommended enhancing control measures in respect of access to and use of confidential information, in order to prevent unauthorised access to law enforcement registers and leaking of information.

Implemented satisfactorily.

xiv. GRECO recommended that a study be conducted concerning risks of conflicts of interest in relation to post-employment and other activities of police officers (including the top level), after they leave the police service, with a view to considering appropriate regulations in this area

Implemented satisfactorily.

xv. GRECO recommended (i) enhancing the current regime for declarations by introducing an obligation in respect of the top management of the National Police (NPN) and the Royal Marechaussee (KMar) to declare financial interests in accordance with a predefined format, when taking up their duties and at regular interval thereafter, (ii) to designate posts which are vulnerable to conflicts of interest, and (iii) to provide for suitable oversight.

RNLM progress report:

A Defence-wide scheme is currently being prepared which further implements the reporting and registration requirement already laid down in the NLD MOD legal status arrangements. The lack of progress thus far can be attributed to competing priorities and limited capacity. It is anticipated that the process of adopting the scheme will commence in early 2025.

xvi. GRECO recommended (i) establishing a requirement for law enforcement officials to report corruption related misconduct within the service; and (ii) adapting the protection of whistleblowers in that respect.

Implemented satisfactorily.

**Ministry of the Interior and
Kingdom Relations**

Concluding remarks

With this letter, the government of the Netherlands informs GRECO about the developments with regards to the recommendations for the prevention of corruption and promotion of integrity for members of government and law enforcement agencies. The government of the Netherlands will actively inform GRECO about new developments that occur with regards to the aforementioned recommendations.

Kind regards,

Head of Delegation of the Netherlands at GRECO
[weggelaten i.v.m. persoonsgegevens]

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