



Federal Ministry
of the Interior, Building
and Community

Prevention of Corruption in the Federal Administration

Annual report for 2017

As at: 13 August 2018

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Developments in and results of corruption prevention in the federal administration Annual report for 2017

I. Preliminary remarks

As the result of the resolutions of the Auditing Committee of 7 May 2004, 28 May 2004 and 24 September 2004, the Federal Ministry of the Interior reports annually to the German Bundestag on the development and results of corruption prevention in the federal administration.

The report is based on a computer-assisted survey of all federal authorities. Every year, the content of the questionnaire used for the survey is improved and the questionnaire is technically refined, taking into account the lessons learnt from the previous year.

The report starts with a summary of selected results (see II. below). This is followed by information on the authorities covered by the report and their staff (see III. below), the suspected cases of corruption in the reporting year (see IV. below), a report on the implementation of the Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration of 30 July 2004 (see V. below) and additional comments concerning individual authorities (see VI. below). The report ends with concluding remarks and a preview of the annual report for 2018 (see VII. below). In the annexes to the report, specific information is presented and summarized in table form. Reorganization measures within the federal administration have affected the identification of areas of activity especially vulnerable to corruption again in this reporting year.

The report shows the executive agencies of the federal ministries, divided into

- higher level;
- middle level;
- lower level;
- legal persons under private law;
- federal courts; and
- other bodies (which do not fit into any of the above categories).

Some information in this annual report is of a general nature. It is intended to facilitate understanding of the report. This means that the passages in question were in some cases already included in previous reports.

At the request of the German Bundestag, all annual reports – from 2013 – are published on the website of the Federal Ministry of the Interior after their referral to the German Bundestag (For the German version, please go to http://www.bmi.bund.de/DE/Themen/Moderne-Verwaltung-Oeffentlicher-Dienst/Korruptionspraevention-Sponsoring-IR/Korruptionspraevention/korruptionspraevention_node.html).

An English translation of the annual reports for 2014 to 2016 is available at <https://www.bmi.bund.de/EN/topics/administrative-reform/corruption-prevention/integrity-node.html>

II. Selected results

- This report covers 469,534 staff¹ in 929 authorities, agencies and other bodies of the federal administration.²
- Investigations into 23 federal employees on suspicion of corruption, typical related offences such as fraud, breach of trust or corruption-related breach of duty were opened and conducted in 2017. This means that in the current reporting year, grounds for suspicion applied to 0.005% of federal administration staff.
- In the current reporting year, 19 proceedings on suspicion of corruption from previous years, involving eight criminal proceedings, seven disciplinary proceedings and four proceedings under labour law were concluded. In some 37% of these proceedings, sufficient evidence of guilt was found to impose punishment, disciplinary proceedings, or proceedings under labour law against federal employees.
- All of the supreme federal authorities have current, reliable data on areas of activity which are especially vulnerable to corruption. On the cut-off date for this report, reliable data on areas of activity especially vulnerable to corruption were available for 99.04% of the staff positions in the executive agencies of all federal ministries (excluding the Federal Ministry of Defence). The Federal Ministry of Defence has made further significant progress in identifying jobs within its remit which are especially vulnerable to corruption again in 2017 (data gathered or updated for 309 agencies in calendar year 2017).
- During the reporting year, 10,614 staff in the supreme federal authorities (not including the Federal Ministry of Defence) worked in areas of activity especially vulnerable to corruption. In the executive agencies of the federal ministries (not including the remit of the Federal Ministry of Defence), a total of 41,561 staff worked in areas of activity especially vulnerable to corruption. The procedure for identifying the number of employees working in areas of activity especially vulnerable to corruption in the Federal Ministry of Defence has not been completed yet. The reviews completed in the reporting year found that 767 ministerial staff members and 5,562 staff members of the ministry's executive agencies work in areas of activity especially vulnerable to corruption.
- At 89.2% of posts within the remit of the Ministry of Defence and at 84.3% of posts within the remit of the remaining federal ministries for which a risk analysis was considered necessary, this risk analysis has been carried out.

¹ Note: Staff in the authorities included in this report consist of civil servants and staff who do not have civil servant status. This distinction is made explicit in the report where it is relevant. Where it is not relevant, "staff" or "federal employees" may include both civil servants and staff who do not have civil servant status.

² The number of staff is based on the information provided by the authorities in response to the survey. It includes the number of civil servants and employees without civil servant status in the federal administration, military personnel in the Bundeswehr and staff of other federal bodies (see III.2).

- The principle of job rotation, in which staff employed in areas especially vulnerable to corruption are rotated to different positions after no more than five years, has largely been ignored for many years, and this practice has not changed. Ways need to be found of dealing with the loss of know-how when a post holder moves to another position, even in times of increasing complexity and at the same time with a focus on ensuring the most efficient staffing levels possible. In the current reporting year, the question was asked for the second time in succession of how long those employees who were the subject of investigations into suspected corruption had been in service. Neither an analysis of responses to this question nor the findings of the Federal Criminal Police Office's 2017 National Situation Report on Corruption (see p. 10 of the report) were able to provide any further insights. After numerous discussions among the federal ministries, the internal corruption regulations are also to be updated in the coming years to reflect the changed framework conditions and to ensure that the anti-corruption regulations are implemented in practice.
- All the supreme federal authorities have appointed their own contact persons for corruption prevention. Almost all executive agencies and other bodies of the federal ministries have a contact person for corruption prevention. This also holds true for the remit of the Federal Ministry of Defence. Six hundred and forty-one agencies (of 679 reporting) have appointed a contact person for corruption prevention.
- Within the federal administration (including the remit of the defence ministry), corruption prevention was the task of 421.07 full-time equivalents. A total of 1,028 individuals acted as contact persons for corruption prevention.
- In 2017, 248,070 federal administration staff (including the remit of the defence ministry) received initial or follow-up corruption-awareness training. This included 18,911 supervisory staff. In 2017, 678 supervisory staff served as trainers, instructors or advisers for corruption-awareness training.
- In 2017, 15,503 federal administration staff were enrolled in initial or advanced corruption-prevention courses which went beyond corruption-awareness training.

III. Key data: Authorities and staff covered by this report

This chapter explains which (see no. 1 below) and how many (see no. 2 below) authorities and staff members are covered by the present report. This is followed by information on which authorities, agencies and other bodies have not been covered in this reporting year and which ones were included for the first time (see no. 3 below).

1. General note

No. 1.1 of the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration of 30 July 2004 applies to all authorities of the direct and indirect federal administration (i.e. the direct federal corporations, offices and foundations created for specific federal tasks) as well as the federal courts and special federal funds.

This report does not cover the social insurance institutions, although in terms of administrative organization they are part of the indirect federal administration. According to the principle of self-government (Section 29 (1) of the Social Code, Book IV), federal administrative regulations pursuant to Article 86, first sentence, of the Basic Law which affect the core area of self-government do not apply to the social insurance institutions. The same is true of the Bundesbank. The German Pension Insurance Federation, the German Pension Insurance for Miners, Railway Workers and Seamen (DRV Knappschaft-Bahn-See) and the social insurance scheme for agriculture, forestry and horticulture workers apply the Directive on a voluntary basis. They are therefore counted with the authorities of the direct federal administration within the remit of the Federal Ministry of Labour and Social Affairs.

In this report, some executive agencies are included in the form of a summary because the relevant data are kept centrally or corruption prevention is centrally organized. Annex 1 shows which data were submitted for groups of authorities.

Because of the large number of staff within the Federal Ministry of Defence's remit, which would have distorted the overall results had their data been combined with those of the other ministries' remits, the Defence remit is mainly described separately.

As in previous years, information on the customs administration (remit of the Federal Ministry of Finance) is given separately in some cases.

2. Number of staff, authorities and other bodies

This report covers 469,534 staff in 929 authorities, agencies and other bodies of the federal administration.

Data were compiled on 249 authorities and other bodies of the federal administration outside the defence remit with a total of 258,713 staff. As regards the remit of the Federal Ministry of Defence, data were compiled on 680 agencies with a total of 210,821 staff.

These are broken down as follows into authorities, agencies and other bodies of the supreme, higher, mid- and lower levels and into federal courts, legal persons under private law, and other bodies.

Outside the remit of the Federal Ministry of Defence

Level	Number of authorities, agencies and other bodies	Number of staff
Supreme federal authorities (including Federal Constitutional Court, excluding Federal Ministry of Defence).	22	33,192
Higher federal authorities	60	74,343
Mid-level federal authorities	1	894
Lower-level federal authorities	109	79,652
Federal courts (not including the Federal Constitutional Court)	6	1,227
Legal persons under private law	15	9,797
Other bodies (e.g. foundations, corporations, self-governing bodies)	36	59,608
TOTAL	249	258,713

Remit of the Federal Ministry of Defence

Level	No. of agencies	No. of staff
Supreme federal authority	1	2,223
Higher federal authorities	21	22,275
Mid-level federal authorities	96	37,130
Lower-level federal authorities	555	143,786
Federal courts (Bundeswehr Disciplinary and Complaints Court)	2	41
Legal persons under private law	5	5,366
TOTAL	680	210,821

For linguistic simplicity, this report will refer to authorities, agencies and other bodies as "authorities" when referring to all three together.

3. Scope of the report

The individual ministries checked to ensure that all authorities within their remit have been included, also using the Federal Government's report on participation. Some authorities covered by the report were included for the first time; as in previous reports, this report does not cover most social insurance institutions (see 1 above) or certain authorities, agencies or other bodies.

For details on the individual authorities, please see below:

a) Within the remit of the Federal Government Commissioner for Culture and the Media

The Federal Chancellor Helmut Schmidt Foundation (BKHSS) was founded effective 1 January 2017. As this was still at the founding stage during the reporting year and was not required to be included in this report, it is not included.

b) Within the remit of the Federal Ministry of Labour and Social Affairs

Within the remit of the Federal Ministry of Labour and Social Affairs, the Federal Employment Agency will no longer provide any information for this report as of this reporting year. Due to the size and type of the organization, it was very difficult and in some cases impossible for the Federal Employment Agency to supply the relevant information in the past.³ The Directive is applied within the Federal Employment Agency irrespective of the fact that the Federal Employment Agency is not obligated to apply it or to implement the measures set out therein, as its status as a social insurance institution in accordance with the principle of self-government means that federal administrative provisions affecting the core of self-government do not apply (see also III.1 above).

c) Within the remit of the Federal Ministry of Finance

The report does not cover the Bundesdruckerei GmbH, which is organized like a private company, with unique task-related and structural features that are incompatible with the statistics on which the report is based. Since the Bundesdruckerei GmbH is no longer part of the public administration, it has been using a separate compliance system for many years that is based on the key anti-corruption standards and rules applicable to private businesses. Within the framework of this system, risks are systematically identified and evaluated and measures are taken accordingly. This risk analysis is carried out every year and is constantly updated. It has covered corruption risks from the outset. The

³ Cf. 2016 annual report, footnote 2.

Board of Supervisors of the Bundesdruckerei GmbH is the competent supervisory body and as such receives (quarterly) compliance reports. Moreover, an external auditing firm regularly reviews the adequacy and effectiveness of the compliance management system.

d) Within the remit of the Federal Ministry of the Interior

The Central Office for Information Technology in the Security Sector (ZITIS) was founded in April 2017 within the remit of the Federal Ministry of the Interior. The Federal Office for Central Services and Unresolved Property Issues (BADV) and the Federal Equalization of Burdens Office (BAA) were transferred from the remit of the Federal Ministry of Finance to the remit of the Federal Ministry of the Interior. They are included in this report.

e) Within the remit of the Federal Ministry of Transport and Digital Infrastructure

As in the previous year, Deutsche Bahn AG is not included in the report due to its special character as an international business enterprise. It is no longer part of the public administration and therefore introduced a separate compliance system for the prevention of corruption many years ago which is based on international standards.

f) Within the remit of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety

Within the remit of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB), the Federation has been sole shareholder in the German society for the construction and operation of waste repositories (Deutsche Gesellschaft zum Bau und Betrieb von Endlagern für Abfallstoffe mbH, DBE) and the agency for interim waste storage (Gesellschaft für Zwischenlagerung mbH, BGZ) since 2017. The non-profit limited liability company ZUG (Zukunft - Umwelt - Gesellschaft gGmbH), which is also within the remit of the BMUB, was also founded in the reporting year.

DBE and Asse-GmbH, a federally owned company for the operation and decommissioning of the Asse II repository, merged with the federal agency for nuclear waste disposal (Bundesgesellschaft für Endlagerung mbH, BGE) effective 20 December 2017.⁴

g) Within the remit of the Bundesrechnungshof (German SAI)

Effective midnight on 31 December 2016, the German SAI dissolved the field offices of the Bundesrechnungshof set up as executive agencies in Berlin, Frankfurt (Main), Ham-

⁴ The data reported for these three institutions is therefore provided as at 20 December 2017.

burg, Hanover, Koblenz, Munich and Stuttgart, and established branch offices at the locations listed. Information on the administrative staff of the field offices of the Bundesrechnungshof is therefore no longer provided.

h) Federal intelligence services

As in previous years, the federal intelligence services (Federal Intelligence Service (BND), Federal Office for the Protection of the Constitution (BfV), Bundeswehr Counterintelligence Office) are not included in the report because doing so could reveal sensitive information, for example concerning the structure and methods of these services. The Federal Government reports on all matters only to the bodies of the German Bundestag which are responsible for oversight of the intelligence services.

IV. Cases of suspected corruption and proceedings concluded in 2017

The following section covers the cases of suspected corruption reported for the first time (see 2) and concluded (see 3) in the reporting year. To better understand this section, the relevant terms used in the Anti-Corruption Directive are specified and a brief overview of the procedure in cases of suspected corruption is given (see 1 below).

1. Definitions and procedure in cases of suspected corruption

There is no legal definition of the term "corruption" in German law. Criminological research offers some orientation and defines the term as follows:

“Misuse of a public office, a position in business or a political mandate in favour of another, either at that person’s request or on one’s own initiative to gain personal benefit or to benefit a third party, resulting in the actual or expected occurrence of damage or disadvantage to the public (with regard to an official or political function) or to a business (with regard to business functionaries).”⁵

In cases of suspected corruption, the Directive obliges the authority’s executive level (no. 10.1 of the Directive) and the contact person (no. 5.2 of the Directive) to take action: The contact person is expected to provide information and advice on an internal level, while the authority’s executive level is expected to notify the highest service authority and take measures to prevent concealment.

The term “case of suspected corruption” is specified in the Handbook on the Working Practices of Contact Persons for Corruption Prevention of 20 September 2013⁶ (hereinafter referred to as “Handbook for Contact Persons”). According to this Handbook, a case of suspected corruption means that actual and understandable evidence or information suggesting corruption emerges in written or oral form, by telephone or in any other way, including in anonymized form. There is usually no such evidence if a case is clearly reported for purposes of denunciation (cf. no. 3 of the Handbook for Contact Persons). If a case of suspected corruption is reported, the contact person, the agency's executive level and personnel management take action. They initiate internal investigations, inform the law enforcement authorities (depending on the result of the investigations) and, in case of imminent danger, may take measures to prevent concealment. Depending on the authority’s structure, the legal office, internal investigation units, the internal audit

⁵ See Bundeskriminalamt (Federal Criminal Police Office), the 2017 National Situation Report on Corruption, page 2, available in German only for download at: https://www.bka.de/DE/AktuelleInformationen/StatistikenLagebilder/Lagebilder/Korruption/korruption_node.html.

⁶ Available in German only at: <https://www.bmi.bund.de/SharedDocs/downloads/DE/publikationen/themen/moderne-verwaltung/korruptionspraevention/korruptionspraevention-handreichung-bei-verdachtsfaellen.pdf?blob=publicationFile&v=2>.

unit and/or the facility protection unit of the police may also take action (for detailed information on the tasks and rights of those involved, please see nos. 4 and 5 of the Handbook for Contact Persons).

The public prosecutor's offices are responsible for carrying out criminal investigations in cases of suspected corruption. First of all, they establish whether an initial suspicion exists and then decide whether to initiate criminal investigations. A criminal investigation ends either with termination, a penal order or a bill of indictment sent to the responsible court. Termination may be considered if it was not possible to gather sufficient evidence (Section 170 (2) of the Code of Criminal Procedure), if the offender's guilt was not considered great enough and there was no public interest in prosecuting the offence (Section 153 of the Code of Criminal Procedure) or if prosecution is discontinued while imposing conditions and instructions upon the accused (Section 153a of the Code of Criminal Procedure). A penal order pursuant to Section 407 of the Code of Criminal Procedure may be considered if, based on the results of the investigation, the public prosecutor's office does not deem a trial necessary. In all other cases the public prosecutor's office will submit an indictment to a German court if the evaluation of the evidence provides sufficient grounds for suspicion (Section 170 (1) of the Code of Criminal Procedure).

Usually, in the case of civil servants, the employer also initiates disciplinary proceedings in parallel to informing the public prosecutor's office. Such proceedings are usually suspended while criminal proceedings are under way and are resumed afterwards. The disciplinary measure is based on the outcome of the criminal proceedings. Civil servants are immediately dismissed from service if they are sentenced by a German criminal court to imprisonment of at least one year on charges of a deliberate crime (see Section 41 (1) no. 1 of the Act on Federal Civil Servants) or to imprisonment of at least six months on charges of accepting bribes in the civil servant's primary position (see Section 41 (1) no. 2 of the Act on Federal Civil Servants). In such cases, the disciplinary proceedings in accordance with the Federal Disciplinary Act will be discontinued (Section 32 (2) no. 2 of the Federal Disciplinary Act).

Even if the criminal proceedings are discontinued or if the court imposes a less serious sentence than those just mentioned, a disciplinary sanction may still be imposed. This is due to the higher standards required of civil servants by civil service law.

The following disciplinary sanctions are provided for in Section 5 (1) of the Federal Disciplinary Act (BDG):

- reprimand (for more details, please refer to Section 6 of the BDG),
- fine (for more details, please refer to Section 7 of the BDG),
- reduction of remuneration (for more details, please refer to Section 8 of the BDG),

- demotion (for more details, please refer to Section 9 of the BDG),
- dismissal from service (for more details, please refer to Section 10 of the BDG).

In the case of employees who are not civil servants, the employer also initiates a disciplinary procedure under labour law in parallel to informing the public prosecutor's office, but suspends it until the criminal proceedings are completed. However, the employer may impose sanctions (e.g. dismissal) even if the criminal proceedings are still ongoing.

The following measures may be taken against non-civil servant public employees in accordance with labour law:

- informal warning,
- formal reprimand,
- dismissal with due notice (for reasons of conduct in accordance with Section 1 (2), second sentence of the Act Governing Protection Against Dismissal) or
- exceptional dismissal (in accordance with Section 626 of the Civil Code).

A case of suspected corruption is concluded when a final decision has been taken under personnel, disciplinary and/or criminal law. A case of suspected corruption is likewise concluded when the unit responsible for personnel and/or the public prosecutor's office have decided not to initiate (criminal) proceedings (cf. no. 3 of the Handbook for Contact Persons).

2. Overview of proceedings initiated in 2017

Criminal investigations⁷ concerning federal employees

In the 2017 reporting year, in the direct and indirect federal administration a total of 19 criminal investigations concerning 24 federal employees (civil servants, non-civil servant employees, military personnel, external staff and other public service staff) were opened in connection with corruption offences in the narrower sense or with typical related offences such as fraud or breach of trust.⁸ In two other cases of suspected corruption, investigations concerning an unknown number of federal employees were opened.

Criminal investigations (concerning unknown persons and one local member of staff) were discontinued in two of these cases during the reporting year due to a lack of evidence.

⁷ Including investigations by the Federal Police.

⁸ Compared to 33 criminal investigations in 2016, 28 in 2015, 19 in 2014 and 2013, 12 in 2012, 34 in 2011 and 31 in 2010.

Disciplinary proceedings/proceedings under labour law against federal employees

In addition to the aforementioned criminal investigations, disciplinary proceedings or proceedings under labour law were launched against 16 federal employees. In one other case of suspected corruption, only proceedings under labour law were initiated, i.e. no parallel criminal investigation took place. Two of the processes were concluded during the reporting year, one as a result of termination of employment and in the other case, because there was no evidence to corroborate the suspicion.

Interim results

In the 2017 reporting year, 23 federal employees, or 0.005%⁹ of federal administration staff, were suspected of having been involved in corruption-related offences (17 cases).

Criminal investigations concerning third parties

Furthermore, in the 2017 reporting year third parties were the subject of ten criminal proceedings in connection with corruption offences in the narrower sense or with typical related offences such as fraud or breach of trust. Third parties in this sense are persons who tried to bribe federal employees or grant them advantages and were reported to the police directly by those approached. In two cases, criminal investigations were discontinued during the reporting year due to lack of evidence (Section 170 (2) of the Code of Criminal Procedure).

a) Federal Foreign Office

aa) Proceedings involving federal employees

The Federal Foreign Office reported 10 new cases of suspected corruption involving a total of 13 staff. All of the cases occurred at German visa offices abroad and concerned the issuing of visas. In all cases a third party was suspected of having tried to influence the staff at visa offices abroad in order to be given appointments or to obtain a visa to which the applicant was not entitled. Local staff (a total of 11 persons) were suspected in eight of these cases, and one civil servant and one local non-civil servant employee in a visa office in one case. In one case, investigations into an as yet unknown number of local staff were opened.

⁹ The percentage is based exclusively on criminal investigations including proceedings terminated pursuant to Section 153 (non-prosecution of petty offences) and Section 153a (provisional dispensing with court action; provisional termination of proceedings) of the Code of Criminal Procedure and on one case where only proceedings under labour law were initiated. It does not include proceedings terminated pursuant to Section 170 (2) of the Code of Criminal Procedure (lack of evidence) or proceedings against third parties outside the federal administration, i.e. givers of bribes.

In all cases, either preliminary investigations by the Federal Police or investigations by the public prosecutor were carried out. In two cases, investigations were discontinued during the reporting year due to a lack of evidence. All other proceedings were still under way when the reporting period ended.

Proceedings under labour law were initiated in parallel against eight local non-civil servant employees under suspicion, and disciplinary proceedings were initiated against the civil servant mentioned above.

bb) Proceedings involving persons not employed by the Federal Foreign Office

Five new cases of suspected corruption involving non-staff were reported to the Federal Police Headquarters by the Federal Foreign Office.

- In two cases, third parties were suspected of human smuggling. Preliminary investigations showed that in one case, there was no evidence to substantiate the suspicion (proceedings were discontinued), while in another case investigations were continued.
- In the two other cases, third parties were suspected of fraudulent procurement of visas. Investigations were carried out in both cases and criminal proceedings were initiated.
- In one further case, third parties were suspected of gang-related fraud in a visa office. Investigations were initiated.

b) Federal Ministry of Labour and Social Affairs

The Federal Ministry of Labour and Social Affairs reported one new case of suspected corruption within its remit. An anonymous message was received accusing a member of staff at a pension insurance scheme data processing centre of selling data to an external private investigation firm. The data in question were allegedly data that enabled heirs to be ascertained. The member of staff was dismissed and no longer works for the pension insurance scheme. Criminal proceedings are still under way.

c) Federal Ministry of Finance (excluding Customs)

aa) Proceedings involving employees

The Federal Ministry of Finance reported one new case of suspected corruption within its remit (excluding Customs) involving public service staff. The case affected the Federal Central Tax Office. One person was suspected of fraud relating to VAT refunds. Criminal investigations were initiated concerning the person under suspicion and two third parties. Proceedings under labour law were also initiated.

bb) Proceedings involving persons not employed by the Federal Ministry of Finance

The Institute for Federal Real Estate reported a case involving only a third party. A potential buyer, accompanied by an employee of the Institute for Federal Real Estate and another potential buyer, viewed several buildings. After the other potential buyer had left, he asked the Institute for Federal Real Estate employee how much he would have to offer for one of the buildings for the offer to be accepted. He offered to provide a financial reward for such information. The Institute for Federal Real Estate employee rejected this immediately. The Institute for Federal Real Estate reported the incident to the police. The public prosecutor's office began an investigation.

d) Federal Ministry of Finance (Customs)

The Federal Ministry of Finance reported that four criminal investigations into third parties had been initiated within the customs administration; one of these was concluded during the reporting year. Details of the individual cases:

- In one case, a third party was checked by two officials at the main customs office for money he was carrying. As he was carrying money with a value of more than €10,000 and had not fulfilled the duty to declare the money, the officials initiated administrative fine proceedings. The accused mimed tearing up the paperwork issued to initiate the administrative fine proceedings and laid €500 on the counter for the officials. Both officials refused to accept the money. The case was reported to the responsible public prosecutor's office and criminal proceedings were initiated. The office responsible for criminal proceedings and fines at the main customs office imposed a fine of €900 on the third party. This case occurred in 2015.
- In another case, the suspect was checked by two officers for goods to be declared on arriving in Germany. During the course of the check, the officer ascertained that the suspect had a new notebook computer with a value of €2,088.03 with him and that he had not fulfilled the duty to declare it. As a result, criminal proceedings pursuant to Section 370 of the German Fiscal Code were initiated. In response, the suspect offered to sell the notebook to the officials for half of its sale price if they refrained from initiating criminal proceedings and the subsequent customs measures. Both officials refused. The main customs office reported the incident to the relevant police office as suspected bribery (Section 334 of the Criminal Code). The tax-related criminal proceedings are ongoing in parallel.
- A person was found with stolen goods from Germany and Denmark during a customs check of a van. To avoid criminal prosecution, the person tried to bribe the three customs officials at the main customs office with money and items of the stolen goods. The officials refused and involved the Federal Police, which took

over the investigation into the stolen goods. The main customs office made an application for criminal prosecution pursuant to 334 (1) of the Criminal Code for suspected bribery.

- One case occurred at the agricultural diesel fuel body of the main customs office. An application for tax relief for agricultural and forestry holdings was handed in together with a €50 banknote. The official reported the matter. The sender was reported to the responsible public prosecutor's office on suspicion of bribery pursuant to Section 333 of the Criminal Code. The public prosecutor's office discontinued the proceedings during the reporting year pursuant to Section 170 (2) of the Code of Criminal Procedure.

e) Federal Ministry of the Interior

The Federal Ministry of the Interior reported four new cases of suspected corruption within its remit.

- One case of suspected corruption involved the Bremen arrival centre of the Federal Office for Migration and Refugees (BAMF). Charges were brought against unknown persons on suspicion of document forgery and accepting favours and bribes due to a forged certificate of asylum. There was suspicion that a member of staff may have been involved in this incident. There were also allegations that this person had worked on a preferential basis with a specific law firm. The investigations by the public prosecutor's office are still under way. The disciplinary proceedings initiated at the same time were suspended until completion of the criminal investigation.
- In another case, a member of staff of a BAMF branch office was suspected of having helped an interpreter to establish his own interpreting agency by repeatedly engaging him for BAMF translation services. The proceedings under labour law initiated on the basis of this suspicion were concluded in the reporting year with a court settlement that terminated the employment of the member of staff in question. The Labour Court had doubts about the evidence available, however. Given the difficulties in providing evidence and the termination of the employment relationship, no charges were brought against the member of staff.
- There was also a suspicion that a local section of the Federal Agency for Technical Relief had provided technical support to a volunteer that had not been correctly billed. A specific individual was the subject of internal investigations to clarify the matter under suspicion.
- Three Federal Police staff members (one civil servant and two non-civil servant employees) at a training facility were suspected of having taken delivery of a variety of alcoholic beverages free of charge from a third party in exchange for a supply contract and follow-up contracts. The three staff members and the third party

are currently the subject of a criminal investigation. Disciplinary proceedings against the civil servant and proceedings under labour law against the non-civil servant employees were initiated during the reporting year.

f) Federal Ministry of Transport and Digital Infrastructure

The Federal Ministry of Transport and Digital Infrastructure reported two new cases of suspected corruption within its remit.

- The Federal Highway Research Unit reported one case of suspected corruption within the context of a procurement procedure. A competitor filed a complaint about alleged unlawful awarding of contracts to the detriment of the Federation. On this basis, an investigation was initiated into unidentified employees of the research unit.
- One employee of a waterways and shipping agency was suspected of having paid invoices for fictitious repairs to official vehicles. In exchange, he is alleged to have received a payment from the car repair workshop for part of the amount. The amount of damage is estimated at around €900,000. Investigative and labour law proceedings were initiated.

g) Federal Ministry of Defence

The Federal Ministry of Defence reported one new case of suspected corruption within its remit in the reporting year. A soldier in the Army Development Office (Amt für Heeresentwicklung) was suspected of having issued a forged end-user certificate to the benefit of a company. Presentation of such a certificate is generally a prerequisite for exports (in line with Section 21 of the Foreign Trade and Payments Ordinance, submission of an end-user certificate is one of the conditions for issuing an export licence). The soldier is alleged to have received payment of around €4,700. Criminal and disciplinary proceedings were initiated.

h) Federal Ministry for Economic Affairs and Energy

The Federal Ministry for Economic Affairs and Energy reported one new case of suspected corruption within its remit. A civil servant at the Federal Office for Economic Affairs and Export Control was suspected of having accepted advantages from a company in the form of invitations to restaurants in exchange for favourable decisions on exemption from the surcharge required by the Renewable Energy Sources Act. The decisions were appealed and were in principle lawful. Exemption from or reduction of the surcharge required by the Renewable Energy Sources Act provides considerable financial relief to the companies in question. Criminal proceedings were initiated.

3. Overview of proceedings concluded in 2017

During the 2017 reporting year, a total of 19 proceedings involving suspected corruption from the previous years were concluded. Specifically, eight criminal investigations, seven disciplinary proceedings and four proceedings under labour law were concluded in the reporting year.

In one case, the criminal proceedings ended with a criminal conviction (suspended custodial sentence with probation). The other proceedings were discontinued.

Two disciplinary proceedings were discontinued. In two proceedings, disciplinary orders that had been initiated were revoked by the courts, while one proceeding ended with the imposition of a fine. Two proceedings ended with the termination of or dismissal from service of the civil servant in question. One proceeding under labour law was concluded with a settlement and the employment relationship was ended, while the three remaining proceedings ended with measures under labour law.

In 37% of these concluded disciplinary/criminal proceedings and proceedings under labour law, sufficient evidence of guilt was found to impose punishment or disciplinary measures against federal employees.

a) Federal Foreign Office

During the reporting year, six proceedings from previous years within the remit of the Federal Foreign Office were concluded.

- Two cases occurred at visa offices abroad. In both cases, no evidence was found to support the initial suspicion of corruption by the one local member of staff in each case and the investigations were discontinued.
- In one case in a mission abroad, the investigation of a local member of staff was also discontinued as there was no evidence to support the initial suspicion.
- In one case in an embassy, a civil servant was the subject of an investigation. No breach of duty by the civil servant was ascertained and the investigation was discontinued.
- One case occurred at the Federal Foreign Office in Berlin. Three non-civil servant employees were suspected of having accepted an invitation from a third party to a VIP sport event worth around €540 per person and not having declared it for approval. The three were subject to measures taken under labour law.
- In one further case at the Federal Foreign Office, a federal employee was suspected of having accepted advantages in connection with construction services at one of Germany's diplomatic missions abroad (VIP lounge access for a football

game and a valuable watch). The proceedings were concluded with a settlement under labour law.

b) Federal Ministry of Finance (Customs)

Within the customs administration of the Federal Ministry of Finance, three proceedings concerning a total of three federal employees were concluded during the reporting year.

- In two cases one civil servant in each case was suspected of having granted customs-related favours in exchange for concert tickets. After the criminal proceedings in accordance with Section 153a of the Code of Criminal Procedure had been discontinued in the previous year against payment of €500 in each case, the disciplinary proceedings were also discontinued in the reporting year and the cases were therefore definitively closed.
- No evidence was found to support the suspicion that a customs official had accepted an interest-free loan of €400 from a company whose contracts for work and services the official was responsible for reviewing within the Federal Customs Administration unit charged with enforcing the law on illegal employment and benefit fraud. The criminal investigation was discontinued pursuant to Section 170 (2) of the Code of Criminal Procedure and the case was therefore definitively closed.

c) Federal Ministry of the Interior

Within the remit of the Federal Ministry of the Interior, four proceedings from previous years were concluded during the reporting year. All of the cases concerned the Federal Police.

- Two Federal Police officers were suspected of having shown their official identification cards to gain entry to a football match without paying admission. The disciplinary proceedings initiated in both cases were concluded in the reporting year. The disciplinary orders that had been initiated against the two Federal Police officers were revoked by the courts.
- One Federal Police officer had searched the police search system on behalf of third parties and had photographed the results screen using his private mobile phone. He then showed the photographs to a third party, in exchange for which he received a total of more than €4,000 in cash over the course of several months. He provided this information service to one other person, from whom he also received a total of €2,000 in cash. The Federal Police officer received a final and binding custodial sentence in the reporting year of nine months suspended with probation, for taking bribes and violating official secrecy. A monetary amount of €7,300 was subject to forfeiture of equivalent value (Sections 332 (1), 353b (1) no. 1,

(4), 52, 53, 56 (1), 73c of the Criminal Code) and must therefore be paid by the offender. The Federal Police officer was removed from service at his own request during the reporting year.

- A civil servant was investigated in association with the procurement of supplies. The investigation provided no indications of suspected corruption. The criminal proceeding was discontinued due to the petty nature of the suspected offence. The disciplinary proceedings initiated were concluded with the imposition of a fine.

d) Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety

One case of suspected corruption was concluded within the remit of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety. One member of staff of Asse-GmbH, a federally owned company for the operation and decommissioning of the Asse II repository, was suspected of accepting benefits or bribes and of being an accessory to same. He was suspected of having awarded contracts to specific companies in violation of the service regulations for procurement and of having received benefits in kind and also cash payments for doing so. The criminal investigation into the case did not confirm the suspicion, and it was therefore discontinued in accordance with Section 170 (2) of the Code of Criminal Procedure. The proceedings under labour law were concluded in 2016 when termination of the employment relationship entered into effect (see Annual Report for 2015, p. 27).

e) Federal Ministry of Transport and Digital Infrastructure

Within the remit of the Federal Ministry of Transport and Digital Infrastructure, one legal proceeding from previous years was concluded in the reporting year. The associated disciplinary proceedings ended in the reporting year with the staff member's removal from service. One staff member of an office for waterways and shipping was suspected of having given preference to a specific company when awarding contracts and having manipulated the invoice related to these contracts. The staff member is suspected of having received a variety of advantages in exchange for this (payment of a car repair invoice, winter tyres and invitations to restaurants).

V. Implementation status of the Directive

1. Areas of activity especially vulnerable to corruption

Measures to prevent corruption in the federal administration start with identifying areas of activity which are especially vulnerable to corruption.

No. 2 of the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration:

Identifying and analysing areas of activity especially vulnerable to corruption

In all federal agencies, measures to identify areas of activity which are especially vulnerable to corruption shall be carried out at regular intervals and as warranted by circumstances. The use of risk analyses shall be considered for this purpose. The results of the risk analysis shall be used to determine any changes in organization, procedures or personnel assignments.

The recommendations intended to help interpret and explain the Federal Government Anti-Corruption Directive describe the term “areas of activity especially vulnerable to corruption” in further detail.

Recommendation on No. 2 of the Directive

Identifying and analysing areas of activity especially vulnerable to corruption

1. Procedure for identifying areas of activity especially vulnerable to corruption

1.1 To identify areas of activity especially vulnerable to corruption within an agency, all areas of activity will be examined for their vulnerability to corruption. Before the process of identification begins, all available information about the various positions and activities (e.g. organizational charts, task assignment charts) should be analysed in order to have as complete an overview as possible of the area to be investigated. A questionnaire may be used to collect additional information needed. Questions about the characteristics listed below (see No. 2 below) may focus on positions or tasks in order to identify areas of activity especially vulnerable to corruption. After compiling all available data, the investigating organizational unit will make a final determination as to special vulnerability to corruption. The results should be compiled and documented for the entire agency (for example in a risk atlas). The handbook on identifying areas of activity especially vulnerable to corruption offers extensive assistance with conducting this procedure.

1.2 The identification process can be divided into two steps: The first step involves identifying the areas of activity in which staff influence on decision-making leads to advantages of significant value to others (areas of activity vulnerable to corruption). Based on these results, areas of activity especially vulnerable to corruption can be identified in a second step.

2. Areas of activity especially vulnerable to corruption

2.1 The following areas of activity are usually especially vulnerable to corruption:

- a. areas in which staff influence on decision-making may lead to advantages of significant value to others, and*
- b. activities involving at least one of the following:*
 - frequent outside contacts, especially monitoring and supervisory activities,*
 - management of large budgets, award of public contracts, subsidies, grants or other funds,*
 - imposing of conditions, granting of concessions, approvals, permits and the like, setting and levying of fees,*
 - processing of transactions and operations using internal information not intended for third parties.*
 - This list is not exhaustive. In certain cases, activities may be especially vulnerable to corruption even in the absence of these characteristics.*

2. Areas of activity especially vulnerable to corruption

2.2 *The criteria listed above are explained in the handbook on identifying areas of activity especially vulnerable to corruption.*

3. Risk analysis

3.1 *In areas of activity especially vulnerable to corruption,*

- *after identifying special vulnerability to corruption for the first time,*
- *after organizational or procedural changes,*
- *after changes to assigned tasks, or*
- *after no more than five years,*
- *the need for conducting a risk analysis should be examined. To do so, the existing safeguards for each area of activity especially vulnerable to corruption and the effectiveness of these safeguards should be briefly examined.*

3.2 *If the brief examination points to a need for action, a risk analysis is to be conducted. For this purpose, the individual operations and processes and existing safeguards against corruption will be examined for each area of activity. This will be followed by an evaluation as to whether the existing safeguards are sufficiently effective to counter the risks. If action is needed, then the organization and processes and/or personnel assignments are to be examined to see how they can be changed. In this case, the risk analysis will include recommendations and/or order additional measures. The key aspects of a risk analysis are described in Annex 5 of the handbook on identifying areas of activity especially vulnerable to corruption.*

The standardized procedures for identifying areas of activity especially vulnerable to corruption have stood the test since their introduction in 2007. Workflows are usually used to ask staff members to fill in a questionnaire for a self-assessment of their area of activity. These questionnaires are usually reviewed by supervisors. Interviews with the heads of divisions conducted by the Internal Audit division or the contact person for corruption prevention are another method. Both methods aim to make it easier to identify activities especially vulnerable to corruption and also to help staff and supervisors classify an area of activity by answering specific questions. It is important for employees to understand that the intent is to identify objectively areas of activity especially vulnerable to corruption, not to evaluate employees' personal suitability. The Anti-Corruption Directive allows for a two-step procedure which it describes in greater detail; it also allows for the procedure to be carried out in one step, which in some cases requires less organizational effort. Describing the results of the first and second steps would result in values that are not comparable to each other, because different authorities take different approaches. For this reason, the practice of including these results in the annual report that was followed until 2012 was not followed in the present report.

a) Identifying areas of activity especially vulnerable to corruption

The status of the identification of areas of activity especially vulnerable to corruption is reported on below: for the supreme federal authorities in aa) and for their executive agencies in bb). In Annex 2, Table a (supreme federal authorities) and in Annex 3, Table a (executive agencies) also provide an overview.

Updating has continued to be the preferred instrument for gathering data. Electronic personnel management systems have made it possible to keep updated records on which staff perform certain tasks and thus work in areas especially vulnerable to corruption, without the need for time-consuming full reviews and also in case of changes in staffing or organization. This also makes it easier to conduct statistical analyses.

aa) Supreme federal authorities

All areas of activity especially vulnerable to corruption were identified and recorded in all of the supreme federal authorities at least once. During the reporting year, 10,614 employees in the supreme federal authorities (not including the Federal Ministry of Defence) worked in areas of activity especially vulnerable to corruption.

Of the 23 supreme federal authorities, 20 conducted a full review or full update in 2012 or later (i.e., no more than four years prior to the 2017 reporting period). Current data on areas of activity especially vulnerable to corruption based on complete reviews or updates in 2017 are available for 16 supreme federal authorities.

The most recent full review in the Federal Ministry of Defence was conducted in 2005. An updated full review of all areas of activity was delayed from 1 April 2012 to 2016 by the reorganization of the Bundeswehr and the associated restructuring of the ministry. The risk analysis for the Federal Ministry of Defence was completed in the 2017 reporting year and identified 767 areas of activity especially vulnerable to corruption. Two divisions were only reviewed in part due to reorganization or restructuring in the interim. The full review of these divisions was still under way during the reporting period.

bb) Executive agencies

The amount of data collected for the executive agencies of all federal ministries is described below. This description does not include the German Pension Insurance for Miners, Railway Workers and Seamen (DRV Knappschaft-Bahn-See), which is within the remit of the Ministry of Labour and Social Affairs, because special conditions apply to the way they collect data.¹⁰

i) Executive agencies (not including the Federal Ministry of Defence)

Reliable data on areas of activity especially vulnerable to corruption are available for 213 executive agencies of the federal ministries with a total of 213,260 staff, out of a total of

¹⁰ The German Pension Insurance for Miners, Railway Workers and Seamen (DRV Knappschaft-Bahn-See) did not classify individual positions, but rather areas of activity. For this reason, it is not included in the description here.

226 authorities with a total of 215,325 staff (not including the Federal Ministry of Defence). No reliable data are available for 13 executive agencies with a total of 2,065 staff. This means that, on the cut-off date for this report, reliable data on areas of activity especially vulnerable to corruption were available for 99.04% of the staff positions in the executive agencies of all federal ministries (not including the Federal Ministry of Defence or the German Pension Insurance for Miners, Railway Workers and Seamen). So almost all staff positions in the executive agencies have been reviewed.

Based on these data, during the reporting year 41,561 staff in the executive agencies of the federal ministries worked in areas especially vulnerable to corruption.

By the data collection cut-off date, existing data on 67,802 staff (31.8%) in the executive agencies of the federal ministries other than the Federal Ministry of Defence were based on full reviews; on 109,146 staff (51.2%) on updates; on 6,810 staff (3.2%) on partial reviews and on 29,502 staff (13.8%) partly on full reviews and partly on updates within the same authority.

Current data on especially vulnerable areas of activity based on complete reviews or updates in 2017 were available for 189 executive agencies. Only in 13 executive agencies was the latest full review or update of areas of activity especially vulnerable to corruption conducted in 2012 or earlier (i.e., more than five years prior to the 2017 reporting period).

ii) Remit of the Federal Ministry of Defence

Within the remit of the Federal Ministry of Defence, with a total of 679 agencies and 208,598 staff, the existing data on areas of activity especially vulnerable to corruption in 204 agencies are based on updates, in 105 agencies on full reviews, in 20 agencies on partial reviews, and in 31 agencies partly on full reviews and partly on updates within the same authority.

There are no current reliable figures on areas of activity especially vulnerable to corruption for five (out of 21) agencies in the higher-level administration, for 12 (out of 96) agencies in the mid-level administration, for 300 (out of 555) agencies in the lower-level administration, or for two of five companies in which the Federation is a shareholder.

Current data on especially vulnerable areas of activity based on complete reviews or updates in 2017 were available for 309 agencies within the remit of the Federal Ministry of Defence. The latest full review or update of areas of activity especially vulnerable to corruption was conducted in 2012 or earlier (i.e., more than five years prior to the 2017 reporting period) in none of these agencies.

Based on these data, during the reporting year 5,562 staff in the remit of the Federal Ministry of Defence worked in areas especially vulnerable to corruption.

b) Risk analysis

Nineteen supreme federal authorities identified a need for a risk analysis regarding areas of activity especially vulnerable to corruption, and risk analyses were conducted in 17 supreme federal authorities.

In 12 of the 13 remits of the federal ministries (not including the Federal Ministry of Defence), the need for risk analysis for a total of 24,034 areas of activity especially vulnerable to corruption was reviewed. In these 12 remits, a total of 20,252 areas of activity especially vulnerable to corruption were reviewed, or 84.26%. Within the remit of the Federal Ministry of Defence, the need for risk analysis was reviewed for 3,931 especially vulnerable areas of activity; risk analyses were conducted for 3,508 especially vulnerable areas of activity, or 89.2%.

Organizational and other measures were taken not only based on the results of the risk analyses, but also for other reasons, for example to compensate for the inability to rotate staff, due to organizational concerns or as a human resources development measure pre-dating the risk analysis. So it is not possible to determine the number of cases in which risk analysis was responsible for introducing such measures. This report, like those for previous years, therefore does not include information on this point.

2. Applying the rotation rule for areas of activity especially vulnerable to corruption

No. 4 of the Directive: Staff

4.1 Staff members for areas of activity especially vulnerable to corruption shall be selected with particular care.

4.2 The length of staff assignments in areas especially vulnerable to corruption shall in principle be limited; as a rule, it should not exceed a period of five years. If an assignment must be extended beyond this period, the reasons shall be recorded for the file.

Rotating staff and tasks can help prevent corrupt relationships from forming and can help bring cases of corruption to light. If rotation is not possible at all or not within the recommended time, the reasons should be recorded and other recommended measures to prevent corruption should be taken.

The long-standing practice of not applying the principle of job rotation in most cases has not changed, because the relevant staff are specialists who cannot be rotated or because they have other specialized skills which are difficult to replace. The further growing

complexity of tasks is aggravating the situation. This also holds true for the situation on the labour market. Due not least to demographic changes, there is a considerable shortage of skilled labour in certain areas, such as IT and engineering. The federal administration is not among the most attractive employers. The cutbacks in personnel resources throughout all sectors in recent years have further worsened the situation.

Other reasons for not rotating staff are impending retirement from active service, impending change of job or the lack of an equivalent position elsewhere. At the same time, there are not enough data on which to base reliable conclusions that not applying the rotation principle is the reason for suspected cases of corruption (the number of which has remained small). This may be true in certain cases, but other factors also play a role.

As in the prior year, for the present report information on whether and if so, how long suspects were involved in activities especially vulnerable to corruption was collected in addition to the usual information on cases of suspected corruption (see IV.). The result of this data collection was as follows:

- **New cases of suspected corruption.** A total of 32 cases of suspected corruption¹¹ were reported, of which 18 involved a total of 23 public service staff.
 - **Conclusion of investigations in the reporting year.** Two proceedings under labour law were concluded in the reporting year. Employment was terminated in both cases (court settlement and/or termination contract by mutual agreement). Both of the staff members concerned worked in areas of activity especially vulnerable to corruption. One of them had been employed in the area of activity for more than five years, the other for between one and three years.
 - **Further investigations.** 21 staff were still subject to ongoing investigations when the reporting year ended. Of the staff concerned, 14 were involved in areas of activity especially vulnerable to corruption. Of these, three had been in the same job longer than the recommended maximum of five years in areas especially vulnerable to corruption pursuant to the Anti-Corruption Directive (see No 4.2).

¹¹ The analysis below does not take into account the following 14 new cases: Two investigations were carried out in which the suspects were unknown. Two new cases were discontinued during the reporting year due to lack of evidence (in one case an investigation concerned an unknown suspect, in the other a known suspect). In ten new cases, only third parties were suspected of corruption (parties giving bribes).

- **Cases of suspected corruption from previous years.** In the reporting year, 12 cases of suspected corruption¹² from previous years were concluded. These involved a total of 14 public service staff.

The investigations found insufficient evidence to confirm the suspicion of corruption in regard to four staff. As a result, all of the proceedings that had been initiated were discontinued (investigations and/or disciplinary measures or measures under labour law¹³). Only one of these staff members had been involved in carrying out tasks in an area especially vulnerable to corruption, for between one and two years. The investigations concerning seven staff led to disciplinary measures or measures under labour law, and in one case also to a criminal conviction. Five of them worked in areas of activity especially vulnerable to corruption, and in all of the cases the recommended five-year length of staff assignment pursuant to the Anti-Corruption Directive (No. 4.2) had been exceeded. In the other cases, the staff in question were not involved in tasks especially vulnerable to corruption.

The question of how internal administrative provisions need to be changed to provide more effective and practicable instruments for job rotation and personnel development measures was discussed among all federal ministries during the reporting year. Revision of the Anti-Corruption Directive began during the reporting year. The provisions regarding job rotation are part of the interministerial discussion and agreement.

a) Supreme federal authorities

Information on staff rotation is obtained from the length of time that public officials are assigned to jobs especially vulnerable to corruption. In the supreme federal authorities (including the Federal Ministry of Defence), the share of staff assigned to areas of activity especially vulnerable to corruption for more than five years was 27.2% on average.¹⁴ The share of staff assigned to areas especially vulnerable to corruption for more than five years was

- more than 60% in one supreme federal authority,
- between 40% and 60% in four supreme federal authorities, and
- less than 40% in ten supreme federal authorities.

¹² The analysis below does not take into account three cases with a total of three suspects, as no details were given of the length of time they had spent working in their area of activity.

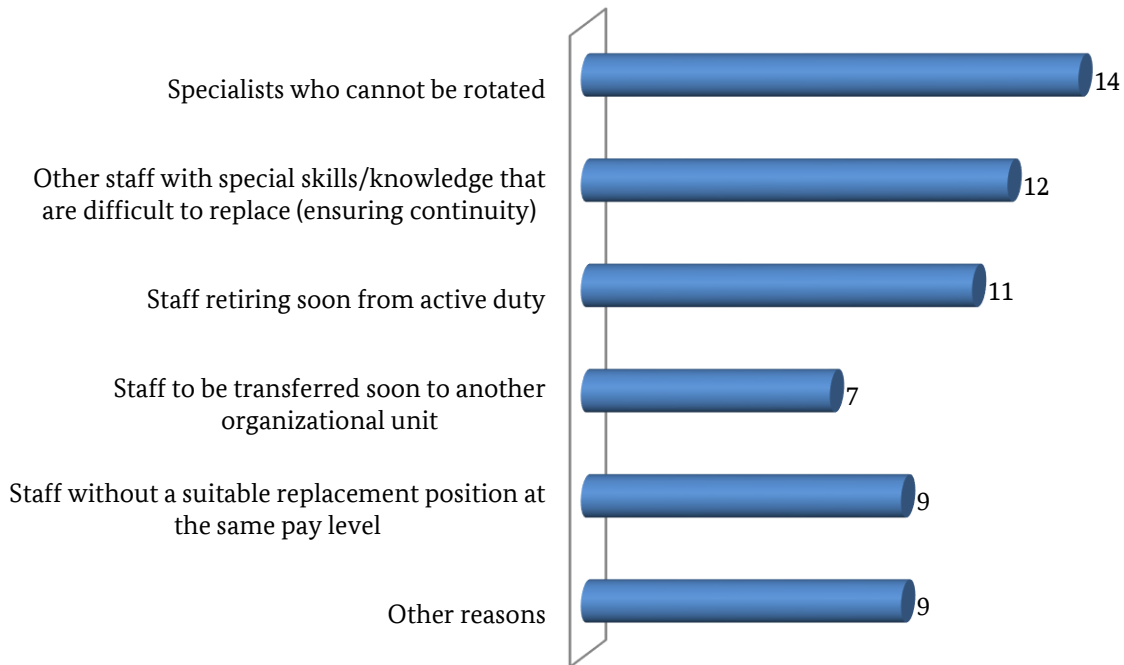
¹³ In three cases, no information was given regarding whether the employee in question was involved in an area of activity especially vulnerable to corruption.

¹⁴ There was insufficient data available at seven supreme federal authorities to enable conclusions to be drawn regarding length of time in positions and the reason for the lack of rotation.

As indicated above, after conducting a thorough risk analysis of the relevant areas, the Federal Constitutional Court identified no areas of activity especially vulnerable to corruption.

The supreme federal authorities explained their failure to rotate staff after a maximum of five years as follows (multiple answers possible; the figures represent the reporting federal authorities):

Reasons for failure to rotate - supreme federal authorities



b) Executive agencies (not including the Federal Ministry of Defence)

Some executive agencies did not have complete data on the length of staff assignments to areas especially vulnerable to corruption. Information is available for 176 executive agencies with a total of 149,865 staff. The share of staff in these executive agencies assigned to areas of activity especially vulnerable to corruption for more than five years was on average

- 25.6% in the superior federal authorities,
- 94.7% in a mid-level federal authority,¹⁵

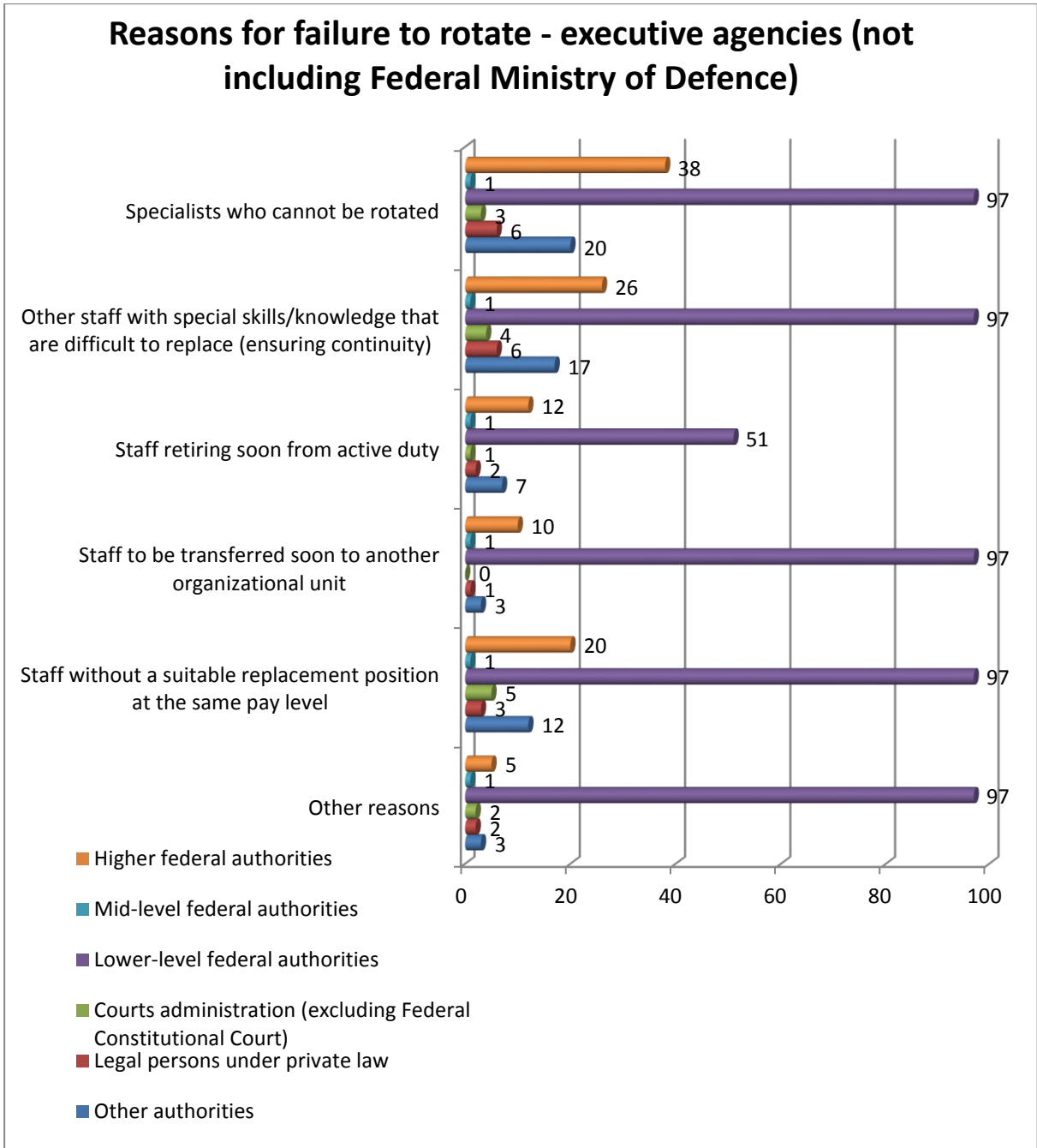
¹⁵ Refers only to an executive agency of the Federal Ministry of Transport and Digital Infrastructure, as this was the only mid-level federal authority in the federal administration (excluding the Federal Ministry of Defence) in the reporting year.

- 41.6% in the lower-level federal authorities,
- 78.2% in the federal courts,
- 28.2% of legal persons governed by private law and
- 41.2% in the remaining authorities not belonging to any of these categories.

For 6,675 of these staff members working for more than five years in an area especially vulnerable to corruption, corruption-prevention measures were taken to compensate for the risks related to a lack of rotation.

No staff of the Federal Police (remit of the Federal Ministry of the Interior) or the Federal Office of Family Affairs and Civil Society Functions (remit of the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth) working in areas especially vulnerable to corruption were assigned to these positions for more than five years.

The reasons given for the failure to rotate in the executive agencies were as follows (number of reports; reports from groups of agencies were only counted once):



c) Executive agencies of the Federal Ministry of Defence

For technical reasons, the Federal Ministry of Defence remit is not included in the statistics given above. The situation there is as follows:

Information on the length of staff assignments in areas especially vulnerable to corruption is available for seven agencies in the higher-level administration, 37 agencies in the mid-level administration and 80 agencies in the lower-level administration, one Bundeswehr disciplinary and complaints court and one legal person governed by private law. Within the remit of the Federal Ministry of Defence, 810 of the total of 5,562 staff working in areas especially vulnerable to corruption were entrusted with the same or similar

tasks especially vulnerable to corruption for more than five years. Of these, 33 worked in the higher-level administration, 57 in the mid-level administration and 701 in the lower-level administration; one worked at the Bundeswehr disciplinary and complaints court, and 18 worked for legal persons governed by private law. For 510 (63%) of these staff members, corruption-prevention measures were taken to compensate for the risks related to a lack of rotation.

3. Administrative and task-related supervision

Rigorous administrative and task-related supervision is a key instrument for preventing corruption.

No. 9 of the Directive: Conscientious administrative and task-related supervision

9.1 Supervisors shall perform their duties of administrative and task-related supervision in a conscientious manner. This includes taking anticipatory measures for personnel management and evaluation.

Supervisors shall pay attention to any signs of corruption. They shall alert their staff to the risk of corruption regularly and as circumstances require.

Administrative and task-related supervision in the context of corruption prevention is understood in two ways:

- with regard to supervisors and their staff, as an instrument for taking anticipatory measures for personnel management and evaluation, and
- with regard to federal ministries and the executive agencies within their remit, as a key element for managing and monitoring the federal administration.

Fourteen supreme federal authorities (including the Federal Ministry of Defence) and 178 executive agencies, as well as 499 other agencies within the remit of the Federal Ministry of Defence have specific regulations on monitoring staff as to how they perform their duties (administrative supervision). Fifteen supreme federal authorities, 177 executive agencies and 298 other agencies within the remit of the Federal Ministry of Defence have specific regulations on monitoring lawfulness and expedience (task-related supervision). Sixteen supreme federal authorities, 176 executive agencies and 77 other agencies within the remit of the Federal Ministry of Defence have additional regulations concerning areas of activity especially vulnerable to corruption; these regulations include for example special tests, special conditions for awarding contracts and the publication of risk atlases.

The 13 supreme federal authorities (including the Federal Ministry of Defence) which are responsible for administrative and task-related supervision of the executive agencies within their remit have the following regulations on cooperation (multiple answers were possible):

- eight supreme federal authorities issue instructions or orders to deal with cases of suspected corruption;
- nine supreme federal authorities have introduced a requirement to report cases of suspected corruption;
- nine supreme federal authorities require regular reports on the implementation of the Directive; and
- ten supreme federal authorities take other measures.

These instruments are also widespread among the few executive agencies (including the remit of the Federal Ministry of Defence) which exercise administrative or task-related supervision of other authorities. It is not possible to provide exact figures here because groups of agencies reported cumulatively.

Details on the supreme federal authorities can be found in Annex 2, Table d and on the individual remits in Annex 3, Table e.

4. Transparency and the principle of greater scrutiny

According to the Anti-Corruption Directive, to reduce the risk of errors and misuse, important decisions are not to be made by individual staff members on their own.

No. 3 of the Directive: Transparency and the principle of greater scrutiny

3.1 The principle of greater scrutiny (ensuring that a number of staff members or organizational units take part in or are responsible for checking operations) shall be observed particularly in areas of activity which are especially vulnerable to corruption. If this is not possible due to legal provisions or insurmountable practical difficulties, then random checks or other measures for preventing corruption (e.g. more intensive administrative and task-related supervision) may be used instead.

3.2 Transparency of decisions and the decision-making process shall be guaranteed (e.g. via the clear delegation of responsibility, mechanisms for reporting, IT-assisted oversight of operations, precise and complete documentation of proceedings).

The principle of greater scrutiny may be implemented in two ways:

- through regulations requiring a second staff member to check work results, meaning that different people are responsible for working on the same task;
- (co-)review and monitoring of work results by additional staff (plausibility check).

Twenty-one supreme federal authorities (including the Federal Ministry of Defence) and 215 executive agencies as well as 429 other agencies within the remit of the Federal Ministry of Defence require a second staff member to check work results.

All 23 supreme federal authorities and 217 executive agencies as well as 435 other agencies within the remit of the Federal Ministry of Defence conduct plausibility checks.

To comply with the principle of greater scrutiny, IT-assisted workflows are used in 21 supreme federal authorities (including the Federal Ministry of Defence) and 203 executive agencies as well as 479 other agencies within the remit of the Federal Ministry of Defence.

Additional details, in particular regarding the kinds of processes supported by IT-assisted workflows, can be found in Annex 2, Table e (supreme federal authorities) and Annex 3, Table f (executive agencies).

5. Contact person for corruption prevention

No. 5 of the Directive: Contact person for corruption prevention

5.1 A contact person for corruption prevention shall be appointed based on the tasks and size of the agency. One contact person may be responsible for more than one agency. Contact persons may be charged with the following tasks:

- a) serving as a contact person for agency staff and management, if necessary without having to go through official channels, along with private persons;
- b) advising agency management;
- c) keeping staff members informed (e.g. by means of regularly scheduled seminars and presentations);
- d) assisting with training;
- e) monitoring and assessing any indications of corruption;
- f) helping keep the public informed about penalties under public service law and criminal law (preventive effect) while respecting the privacy rights of those concerned.

5.2 If the contact person becomes aware of facts leading to reasonable suspicion that a corruption offence has been committed, he or she shall inform the agency management and make recommendations on conducting an internal investigation, on taking measures to prevent concealment and on informing the law enforcement authorities. The agency management shall take the necessary steps to deal with the matter.

5.3 Contact persons shall not be delegated any authority to carry out disciplinary measures; they shall not lead investigations in disciplinary proceedings for corruption cases.

5.4 Agencies shall provide contact persons promptly and comprehensively with the information needed to perform their duties, particularly with regard to incidents of suspected corruption.

5.5 In carrying out their duties of corruption prevention, contact persons shall be independent of instructions. They shall have the right to report directly to the head of the agency and shall not be subject to discrimination as a result of performing their duties.

5.6 Even after completing their term of office, contact persons shall not disclose any information they have gained about staff members' personal circumstances; they may however provide such information to agency management or personnel management if they have a reasonable suspicion that a corruption offence has been committed. Personal data shall be treated in accordance with the principles of personnel records management.

All the supreme federal authorities have contact persons for corruption prevention.

All of the executive agencies carrying out operational activities during the reporting period and other bodies within the remit of the federal ministries other than the Federal Ministry of Defence also have contact persons for corruption prevention. The Central Office for Information Technology in the Security Sector (within the remit of the Federal

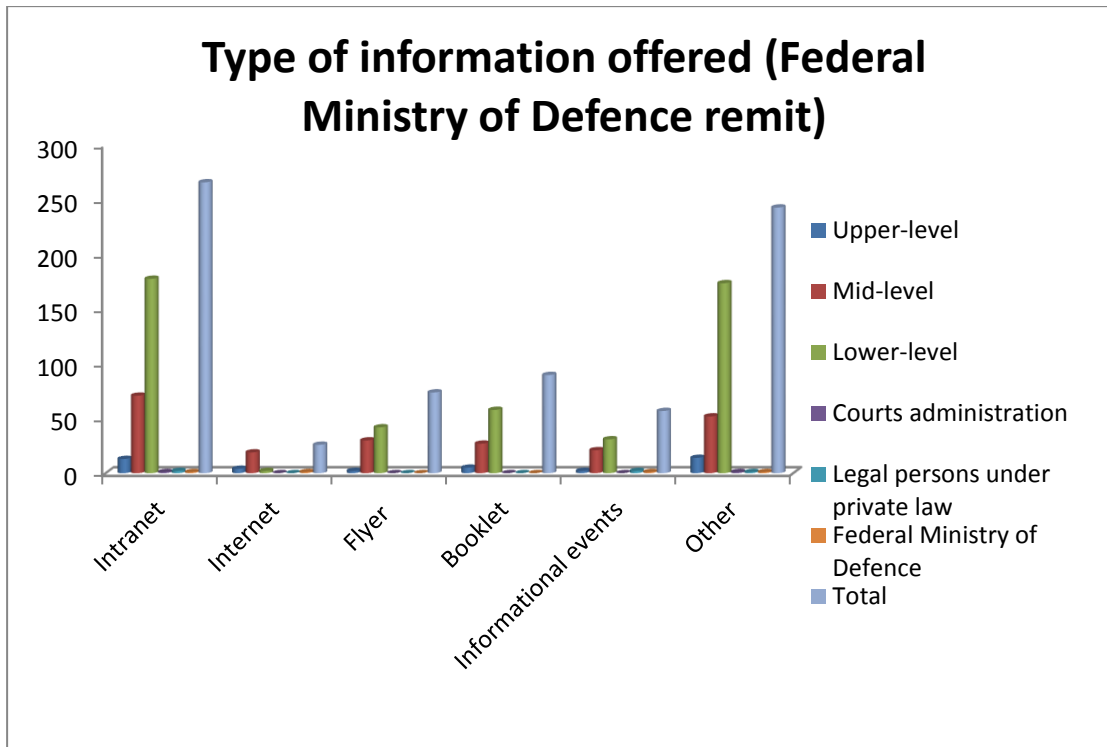
Ministry of the Interior) and Zukunft-Umwelt-Gesellschaft (ZUG) gGmbH (within the remit of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety) did not yet have a contact person for corruption prevention as they were established during the reporting year. ZUG gGmbH began operations on 1 January 2018.

Fifty-three executive agencies or bodies share a contact person with another agency. They are

- the Federal Office for the Safety of Nuclear Waste Management (120 staff),
 - the Federal Agency for Administrative Services (239 staff),
 - the federal agency for nuclear waste disposal (BundesGesellschaft für Endlagerung mbH) (184 staff prior to the merger on 20 December 2017),
 - the Federal Institute for Population Research (47 staff),
 - the Federal Institute of Sport Science (36 staff),
 - the Federal Department for Media Harmful to Young Persons (22 staff),
 - the Central Command for Maritime Emergencies (29 staff),
- and
- 46 local offices for waterways and shipping and offices for new construction (11,141 staff).

The vast majority of agencies within the remit of the Federal Ministry of Defence also have a contact person for corruption prevention. Thirty-eight agencies (of 679 reporting) have not yet appointed a contact person for corruption prevention; 327 agencies (244 of them in the lower-level administration and 83 in the mid-level administration) share a contact person with another agency.

The type and frequency of information provided by contact persons in the Federal Ministry of Defence and its remit is shown in the following graphic (number of agencies reporting; multiple answers possible):



In the reporting year, 550 contact persons for corruption prevention (including 374 from the Federal Ministry of Defence) met with agency management representatives to discuss issues related to corruption prevention. Thus the number of contact persons who met with agency management to discuss corruption prevention increased slightly compared to the previous year (522 contact persons who met with agency management). Annex 2, Table f (supreme federal authorities) and Annex 3, Table g (executive agencies) show the reasons for contacts and their frequency.

In the entire federal administration (not including the Federal Ministry of Defence and its remit), 192.67 full-time equivalents (as far as it was possible to collect specific figures) were assigned corruption prevention tasks. Performing the tasks of contact person for corruption prevention accounted for approximately 99.47 full-time equivalents, carried out by 471 persons. Other corruption prevention tasks were performed by 621 persons, accounting for 93.20 full-time equivalents.

Within the Federal Ministry of Defence and its remit, 557 persons (202.86 full-time equivalents) were responsible for the tasks of contact person for corruption prevention, while 225 persons (25.54 full-time equivalents) were assigned other corruption prevention tasks.

This means that within the federal administration, corruption prevention was the task of 421.07 full-time equivalents.

6. Staff awareness

No. 7 of the Directive: Staff awareness and education

7.1 When taking the oath of office or agreeing to abide by the requirements of their position, staff members shall be informed of the risk of corruption and the consequences of corrupt behaviour. When a staff member has been informed, a record shall be kept of this fact. In view of the risk of corruption, staff attention shall continue to be directed to this issue. In addition, all staff members should be given an anti-corruption code of conduct informing them of what to watch out for in situations or areas of activity which are especially vulnerable to corruption.

7.2 Staff members working in or transferred to areas of activity especially vulnerable to corruption should be given additional, job-specific instruction at regular intervals.

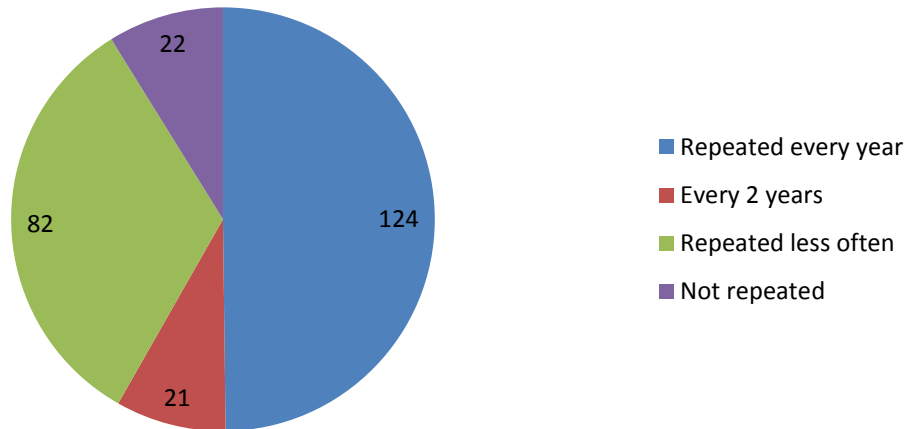
In the entire federal administration (not including the remit of the Federal Ministry of Defence), a total of 105,402 staff (out of a total of 258,713, i.e. 40.7%), including 7,855 supervisory staff, received corruption-awareness training during the reporting year. About 32.8% of these staff worked in positions especially vulnerable to corruption. Further, during the reporting year 401 supervisory staff members were involved in providing awareness-raising measures as trainers, instructors or advisers.

Within the Federal Ministry of Defence and its remit, 142,668 staff (out of a total of 210,821, or 67.7%), including 11,056 supervisory staff, received corruption-awareness training; 277 supervisory staff members were involved in providing awareness-raising measures as trainers, instructors or advisers.

As the following overviews show, in 49.8% of all federal agencies, and in 79% of agencies within the remit of the Federal Ministry of Defence, staff working in areas especially vulnerable to corruption receive corruption-awareness training every year:

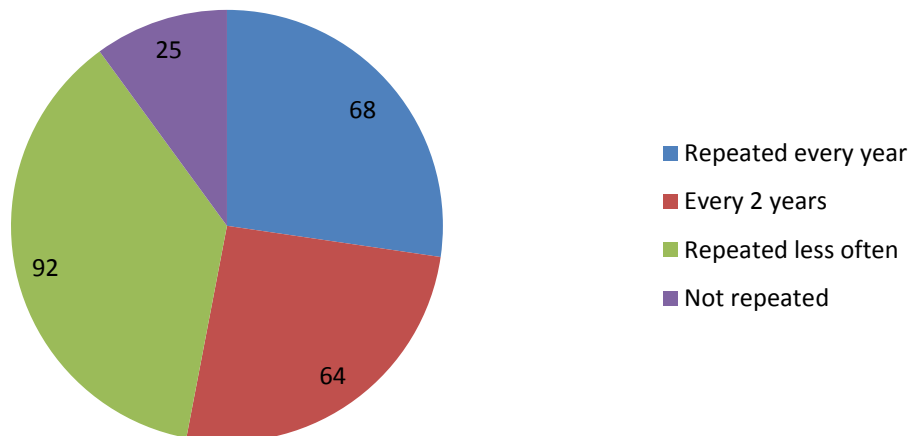
Total federal administration (not including Federal Ministry of Defence)

Corruption-awareness training for staff working in areas especially vulnerable to corruption (if applicable) - No of authorities reporting (not including Federal Ministry of Defence)



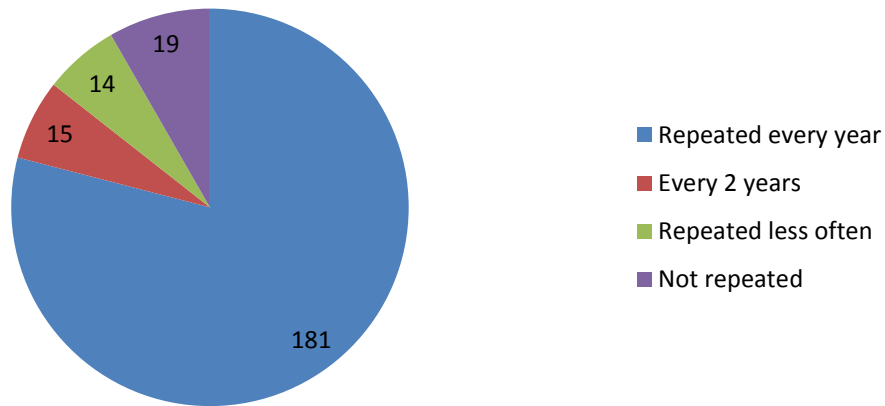
Corruption-awareness training for all other staff (if applicable)

-
No of authorities reporting (not including Federal Ministry of Defence)

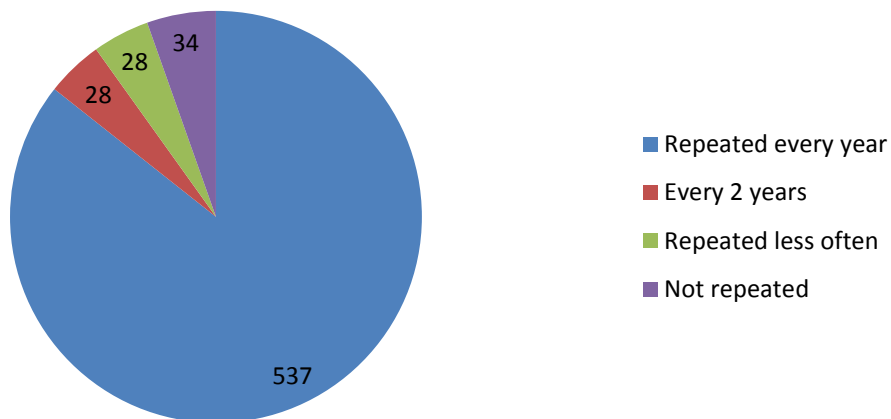


Federal Ministry of Defence and its remit

Corruption-awareness training for staff working in areas especially vulnerable to corruption (if applicable) - No of departments reporting (Federal Ministry of Defence and its remit)



Corruption-awareness training for all other staff (if applicable) - No of departments reporting (Federal Ministry of Defence and its remit)



7. *Basic and advanced training*

No. 8 of the Directive: Basic and advanced training

8. *Facilities providing basic and advanced training shall include corruption prevention in their programmes. In doing so, they shall take into account above all the training needs of supervisory staff, contact persons for corruption prevention, staff in areas especially vulnerable to corruption, and staff in the organizational units referred to in No. 6.*

Basic and advanced training extends beyond measures to increase awareness. This section describes measures that have an interactive process in which a multiplier (instructor) imparts knowledge based on a concept using a certain system (didactics); as a rule, this knowledge is imparted in a multi-step process and then consolidated. A lecture, for example in the context of orientation for new staff, thus constitutes instruction for initial awareness rather than training. “E-learning” constitutes training if the interactive element in the imparting of knowledge plays a clearly recognizable role, for example when testing what has been learned.

In addition to an electronic learning programme (which was upgraded and modernized during the reporting year), the Federal Academy of Public Administration (BAkÖV), the central federal training facility, always offers courses on preventing and fighting corruption and on preventing corruption in at-risk areas. These courses are intended especially for supervisory staff in the higher and higher intermediate service, for contact persons for corruption prevention, for staff of organizational units responsible for preventing corruption and for staff in areas especially vulnerable to corruption. The courses deal with the forms corruption can take; recognizing behaviour that can corrupt; the tasks of the contact person for corruption prevention; fighting corruption (including relevant law and regulations); the national and international dimensions of corruption; the consequences pursuant to criminal, public service and labour law for those engaged in corrupt behaviour; how to speak and act in cases of suspected corruption.

The special office for basic and advanced training of the Federal Ministry of Transport and Digital Infrastructure and the Federal Revenue Administration's Training and Knowledge Centre offer largely identical training seminars; the Bundeswehr's training centre offers orientation courses for contact persons for corruption prevention.

In addition, the Federal Revenue Administration plans to introduce an obligatory e-learning module for advanced training for supervisory staff at the customs administration. The Federal Ministry of Transport and Digital Infrastructure has introduced its own electronic learning programme with three modules for different target groups for the ministry and its remit. In the 2017 reporting period, 2,392 staff completed these modules. Since 2013, 19,116 staff have completed this type of training.

Overall, 11,358 staff took part in basic and advanced corruption-prevention training by the supreme federal authorities and their remit (not including the Federal Ministry of Defence and its remit); at least 4,287 of them were staff in areas especially vulnerable to corruption (not all authorities make this distinction for all course participants). In part, this can be explained by the fact that some organizational units have introduced further training obligations that also require staff members who are not involved in activities especially vulnerable to corruption to attend corruption-prevention training. Within the Federal Ministry of Defence and its remit, 4,145 staff participated in basic and advanced training on preventing corruption; 469 of them were identified as working in areas of activity especially vulnerable to corruption.

Executive staff of the ministries and agencies in 70.68% of the authorities reporting (other than the Federal Ministry of Defence and its remit) received corruption-prevention training. In 2017, 2,268 supervisory staff were trained in preventing corruption, and 73 supervisory staff were involved in training measures as trainers, instructors or advisers. Within the Federal Ministry of Defence and its remit, 410 supervisory staff received such training, and 23 supervisory staff were actively involved in providing the training.

VI. Additional information from individual supreme federal authorities and their remits

The following supreme federal authorities have provided additional information on special developments within their remits and to aid in understanding the data supplied to produce this report:

The Federal Commissioner for Data Protection and Freedom of Information (BfDI)

After the office of the BfDI became an independent agency effective 1 January 2016, it appointed a contact person for corruption prevention. General information talks were held repeatedly with staff on aspects of corruption prevention throughout the reporting period. This general information is to be provided in writing in the form of a flyer that will be distributed to staff so that they can find information on important aspects of corruption prevention at any time. It is also planned to tackle the topic of corruption prevention at orientation events for new staff, to provide them with information on the topic and to raise their awareness.

Federal Ministry of Education and Research (BMBF)

The Federal Institute for Vocational Education and Training, which is in the remit of the Federal Ministry of Education and Research, intends to carry out a review of areas of activity especially vulnerable to corruption, including a risk analysis. This was last carried out in 2016.

Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ)

The decision was made at the BMFSFJ in the reporting year to carry out a new complete survey of all areas of activity especially vulnerable to corruption and to produce a risk atlas. The latest full survey took place in 2012.

Federal Ministry of Finance (BMF)

The Federal Agency for Financial Market Stabilization (FMSA) no longer exists as an independent agency within the remit of the Federal Ministry of Finance, effective 31 December 2017. Pursuant to the act to restructure the FMSA, it was split: The section of the FMSA responsible for the management of the Financial Market Stabilization Fund was integrated into the Federal Republic of Germany – Finanzagentur GmbH (financial supervision) and the section responsible for bank resolution planning was integrated into the Federal Financial Supervisory Authority.

Federal Ministry of Finance (Customs)

The customs administration was restructured effective 1 January 2016. In particular, the operational-supervisory functions that had been shifted from the Federal Ministry of Finance (BMF) were merged with the tasks that had been the responsibility of mid-level federal authorities under the umbrella of the newly established General Customs Administration (GZD). A review of the areas of activity especially vulnerable to corruption is required for the GZD. The method for ascertaining vulnerability to corruption is currently being tested in one of the first pilot phases at the GZD. It will subsequently be implemented.

Federal Ministry of the Interior

In 2017, organizational units from within the remit of the Federal Police Headquarters were moved to a newly established Federal Police regional office. The Federal Police now have 12 regional offices (instead of 11 as before). The number of staff to be taken into account for the Federal Police Headquarters is therefore lower than in the previous report.

In 2016, the Federal Statistical Office launched a new process of identifying all areas of activity especially vulnerable to corruption. This was continued in 2017 and is expected to be completed in the first half of 2018.

The Federal Agency for Technical Relief (THW) was restructured effective 1 January 2018. The process of ascertaining all agencies in which the main function is especially vulnerable to corruption at THW started in 2017.

Federal Ministry for Economic Cooperation and Development

Following the reorganization measures when the new government was formed, a new review will be carried out in autumn 2018 at the Federal Ministry for Economic cooperation and Development (BMZ) to identify areas of activity especially vulnerable to corruption. A training concept is currently being drawn up in the field of anti-corruption.

German Bundestag

The recommendations from the standardization working group on identifying areas of activity especially vulnerable to corruption in regard to the Anti-Corruption Directive of the BMI dated 4 January 2012, cite the figure of €10,000 as the value threshold for an advantage of significant value. This value is taken as the basis for assessing whether an area of activity is classed as vulnerable to corruption (see also V.1 above). This value threshold is set at €25,000 in the Bundestag administration.

VII. The future of corruption prevention – Conclusions and outlook

The Anti-Corruption Directive is still implemented to a high degree in the supreme federal authorities and their remits, in agencies and other bodies.

When collecting the data for this report, respondents were also asked to indicate where they saw potential to further develop corruption prevention and which concrete measures had been initiated or already implemented during the reporting year. New training measures, organizational measures and measures related to areas of activity/jobs were the most frequently mentioned aspects (see also Annex 4 below).

Some examples from individual authorities will be explained in further detail below to show which specific measures they carried out in the reporting year or plan to introduce in the future:

- **Federal Foreign Office:** Alongside other measures, the Federal Foreign Office sent a circular to all diplomatic missions accredited in Berlin, raising awareness of the topic of corruption. Awareness was also raised among all staff at the Federal Foreign Office by means of a letter from its head. In addition, meetings were held with the heads of the German diplomatic missions abroad on the topic of corruption and its prevention.
- **The Federal Government Commissioner for Culture and the Media (BKM):** The Kulturveranstaltungen des Bundes in Berlin GmbH, which is within the remit of the BKM, trains all new staff on a quarterly basis. This means staff receive at least one introduction to the topic, regardless of the specific area of activity in which they are or will be deployed.

The BKM's Foundation Memorial to the Murdered Jews of Europe, which provides regular training courses for staff members involved in activities especially vulnerable to corruption, extended the scope of training courses on corruption prevention during the reporting year to include all staff members.

At the suggestion of the BKM, the Academy of Arts has established a special project on corruption prevention with one temporary position for a member of staff. Its tasks include the following:

- carrying out an academy-wide process of change in regard to corruption prevention
- identifying, assessing and documenting areas of activity vulnerable to corruption (risk analysis and risk atlas)
- drafting recommendations for an internal control system (ICS)

- raising awareness and providing training for the specialist departments at the Academy of Arts.
- **Federal Ministry of Labour and Social Affairs (BMAS):** The German Pension Insurance for Miners, Railway Workers and Seamen (DRV Knappschaft-Bahn-See), which comes within the remit of the BMAS, has begun carrying out integrity tests for staff entrusted with accounting and bookkeeping tasks. The information required is collected on a voluntary basis only, during a personal risk meeting. During the meetings, it is made clear to the staff members in question that in case of insufficient basis for carrying out checks due to a lack of cooperation, accounting security will be given priority (including possible reassignment to a different post). The check cycle is to be of five years, with an official statement to be submitted by the relevant individuals. In addition, a review of the existing risk analysis was begun during the reporting year.
- **Federal Ministry of Education and Research (BMBF):** Staff at the BMBF are regularly reminded of the importance of corruption prevention and training measures by e-mail. A new training measure was introduced during the reporting year: The contact person for corruption prevention was included in the checklist for new staff. This means that every new staff member must visit the contact person for an initial individual awareness-raising session.
- **Federal Ministry of Food and Agriculture (BMEL):** The Federal Office of Consumer Protection and Food Safety (BVL), within the remit of the BMEL, has begun incorporating the rules on corruption prevention that apply to the public administration into the quality management system (QMS) at the BVL, which has been certified in line with DIN EN ISO 9001 since 2012. In order to implement the Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration dated 30 July 2014 transparently and to implement the BMI recommendations at the BVL, a draft of a quality management (QM) document was drawn up in the form of a worksheet under the supervision of the contact persons for corruption prevention and the quality managers at the BVL. This document sets out responsibilities and routing for documents (e.g. to whom gifts are to be reported, where such reports are saved, who implements professional basic and advanced training in practice, where a risk analysis is to be carried out). A value threshold of €25 has been set for the acceptance of minor gifts. Up to that value, acceptance is tacitly agreed, provided that the member of staff can be assumed not to be influenced by the gift. However, every gift must be reported. Staff in organizational units that are involved in practical measures and processes, including the HR division, internal auditing, the contact persons for corruption prevention, and the training officers, are specifically affected by the planned QM

regulations. Following their approval, the implementation of and compliance with the processes set out in the QM document are reviewed regularly as part of internal and external quality management audits.

- **Federal Ministry of Finance (BMF):** The Federal Central Tax Office within the remit of the BMF has published case studies on its intranet from the series “What would you do?” to encourage discussion among staff. In addition, multipliers have been appointed at all locations as direct contact persons for staff and to provide extra personnel to support the contact person for corruption prevention.

The Deutsche Bundespost Federal Office for Posts and Telecommunications has introduced the e-learning system provided by the Federal Academy of Public Administration as a training instrument. The online training programme is obligatory for all staff.

- **Federal Ministry of the Interior (BMI):** The Federal Ministry of the Interior implemented various measures to enhance corruption prevention in the reporting year. For example, it awarded a contract to a Berlin-based law firm with branch offices in Cologne and Frankfurt (Main) to establish the post of ombudsperson for cases of suspected corruption. During the reporting year, the ministry held a topic-specific information event for all of its staff during a lunchtime event. The ministry had an information stand on the topic of corruption prevention in the federal administration for visitors to the government open day. The staff of the relevant division answered a large number of questions and gave out information material.

The Procurement Office of the Federal Ministry of the Interior organized and carried out an information event during the reporting year for managers on the topic “People only stick to the rules when they can stick them out.” The course leader was a lecturer at Münster University of Applied Sciences. The course looked at practical examples to explain which factors influence organizational culture, and what effects this can have on the culture of compliance within an organization. The procurement office plans to continue the series of training courses.

The Federal Office of Civil Protection and Disaster Assistance (BBK) has also carried out training measures for its staff. These included two events on the topic of corruption prevention in the organizational and compliance culture in the BBK, with expert support from a researcher.

- **Federal Ministry of Justice and Consumer Protection (BMJV):** The Federal Financial Court (BFH) revised its circular on the ban on the acceptance of rewards, gifts and other advantages in 2017. To make all those working there aware of it,

the BFH sent an e-mail to all staff asking them to read the circular, which they could access on the intranet.

The Federal Office of Justice created an Excel database to help deal with the extremely large workload resulting from carrying out threat assessments for ascertaining areas of activity especially vulnerable to corruption, as well as the risk analyses to be carried out subsequently if necessary in conjunction with the IT department and the IK section (internal auditing; corruption prevention). This database can be used to automatically compile the questionnaires for supervisory staff in the individual organizational units required for the analysis, and to automatically input and analyse the resultant answers, for example. With the help of this IT support, it was possible to carry out a risk analysis for every area of activity especially vulnerable to corruption. This meant that no check of whether a risk analysis was necessary was required.

- **Federal Ministry for Economic Affairs and Energy (BMWi):** During the reporting year, the Federal Cartel Office (within the remit of the BMWi) held the first of a series of four events aimed at raising awareness among all of its staff. The subsequent awareness-raising events took place in the first quarter of 2018, and supervisory staff also took part.

The Federal Institute of Physics and Metrology, within the remit of the BMWi, provides its staff with regular information by telephone on the topic of accepting gifts both in Germany and abroad, taking into account country-specific characteristics. In addition, it revised the information for all staff on the acceptance of gifts and rewards during the reporting year.

The Federal Institute for Geosciences and Natural Resources holds regular events for project staff to raise awareness among project managers who work in other countries. These events include workshops on corruption prevention in which participants develop potential solutions.

- **Federal Ministry for Economic Cooperation and Development (BMZ):** Alongside other measures, the BMZ held an anti-corruption day at the ministry on 11 December 2017 to mark International Anti-Corruption Day. The anti-corruption team at the BMZ and GIZ held discussions with staff and answered their questions. Participants then had the chance to test their knowledge in a quiz. To coincide with Anti-Corruption Day, an e-mail circular was sent to all staff to raise awareness of the topic of corruption.

This overview shows that many agencies of the federal administration are developing and implementing ideas for improving corruption prevention.

Germany is committed to making prevention a key instrument in combating corruption at international level too. The Federal Government made tackling corruption one of the key issues of its G20 presidency in 2017 and submitted its High Level Principles on Organizing Against Corruption to the G20 Anti-Corruption Working Group. These principles set out how organizational structures and procedures can be designed to strengthen the public administration's resistance to corruption. They are also intended to help reduce the risk of corruption in public administration and to identify cases of corruption. The G20 heads of state and government adopted these high-level principles, which are found in the annex to the G20 Leaders' Declaration.¹⁶

¹⁶ Available in English at https://www.g20germany.de/Content/DE/Anlagen/G7_G20/2017-g20-acwg-anti-corruption_blob=publicationFile&v=7.pdf and in German at: https://www.g20germany.de/Content/DE/Anlagen/G7_G20/2017-g20-acwg-anti-corruption-de_blob=publicationFile&v=4.pdf.

List of Tables

Annex 1: Authorities included in this report

Table a: Supreme federal authorities included in this report

The tables use the abbreviations listed below.

Abbrevia- tion	Name of the supreme federal authority
BKAmt	Federal Chancellery
BMWi	Federal Ministry for Economic Affairs and Energy
AA	Federal Foreign Office
BMI	Federal Ministry of the Interior
BMJV	Federal Ministry of Justice and Consumer Protection
BMF	Federal Ministry of Finance
BMAS	Federal Ministry of Labour and Social Affairs
BMEL	Federal Ministry of Food and Agriculture
BMVg	Federal Ministry of Defence
BMFSFJ	Federal Ministry for Family Affairs, Senior Citizens, Women and Youth
BMG	Federal Ministry of Health
BMVI	Federal Ministry of Transport and Digital Infrastructure
BMUB	Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety
BMBF	Federal Ministry of Education and Research
BMZ	Federal Ministry for Economic Cooperation and Development
BRH	German Supreme Audit Institution, administration

Abbrevia- tion	Name of the supreme federal authority
BPA	Press and Information Office of the Federal Government
BKM	Federal Government Commissioner for Culture and the Media
BPrA	Federal President's Office
BVerfG	Federal Constitutional Court
BT	German Bundestag
BR	Bundesrat
BfDI	Federal Commissioner for Data Protection and Freedom of Information

Table b: Executive agencies included in this report

excluding the remit of the Federal Ministry of Defence

Within the remit of the Federal Foreign Office

- German Archaeological Institute

Within the remit of the Federal Government Commissioner for Culture and the Media

- Academy of Arts
- Federal Archives
- Federal Institute for Culture and History of the Germans in Eastern Europe
- Federal Chancellor Willy Brandt Foundation
- Federal Foundation for the Study of the Communist Dictatorship in Germany
- The Federal Commissioner for the Files of the State Security Service of the Former German Democratic Republic
- German National Library
- German Federal Film Board
- Kulturveranstaltungen des Bundes in Berlin GmbH
- Otto von Bismarck Foundation
- Home of Chancellor Adenauer Foundation
- Home of President Theodor Heuss Foundation
- Foundation Memorial to the Murdered Jews of Europe
- German Historical Museum Foundation
- Haus der Geschichte der Bundesrepublik Deutschland Foundation
- Jewish Museum Berlin Foundation
- Prussian Cultural Heritage Foundation
- President Friedrich Ebert Memorial
- Transit Film GmbH

Within the remit of the Federal Ministry of Labour and Social Affairs

- Federal Institute for Occupational Safety and Health
- Federal Labour Court
- Federal Social Court
- Federal Insurance Office
- German Federal Pension Insurance
- German Pension Insurance for Miners, Railway Workers and Seamen
- Social insurance scheme for agriculture, forestry and horticulture

Within the remit of the Federal Ministry of Education and Research

- Federal Institute for Vocational Education and Training

Within the remit of the Federal Ministry of Food and Agriculture

- Federal Office of Consumer Protection and Food Safety
- Federal Office for Agriculture and Food
- Federal Institute for Risk Assessment
- Federal Office of Plant Varieties
- Deutsches Biomasseforschungszentrum gemeinnützige GmbH
- Friedrich Loeffler Institute
- Johann Heinrich von Thünen Institute
- Julius Kühn Institute
- Max Rubner Institute – Federal Research Centre for Nutrition and Food

Within the remit of the Federal Ministry of Finance (excluding the customs administration)

- Federal Financial Supervisory Authority
- Federal Agency for Financial Market Stabilization
- Institute for Federal Real Estate
- Deutsche Bundespost Federal Office for Posts and Telecommunications

- Federal Spirits Monopoly Administration
- Federal Republic of Germany – Finanzagentur GmbH
- Federal Central Tax Office
- EWN Entsorgungswerk für Nuklearanlagen GmbH
- Federal Information Technology Centre
- Lausitzer und Mitteldeutsche Bergbau-Verwaltungsgesellschaft mbH (Lusatian and Central German Mining Management Company)
- Museum Foundation Post and Telecommunications
- VEBEG GmbH Federal Disposal Sales and Marketing Agency

Within the remit of the Federal Ministry of Finance (customs administration)

- Central Customs Authority
- Main customs offices, customs investigation offices (cumulative data provided for 43 main customs offices and eight customs investigation offices)

Within the remit of the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth

- Federal Office of Family Affairs and Civil Society Functions
- Federal Department for Media Harmful to Young Persons

Within the remit of the Federal Ministry of Health

- Federal Institute for Drugs and Medical Devices
- Federal Centre for Health Education
- German Institute for Medical Documentation and Information
- Paul Ehrlich Institute
- Robert Koch Institute

Within the remit of the Federal Ministry of the Interior

- Procurement Office of the Federal Ministry of the Interior
- Federal Office of Civil Protection and Disaster Assistance
- Federal Agency for Cartography and Geodesy

- Federal Office for Migration and Refugees
- Federal Office for Information Security
- Federal Office of Central Services and Unresolved Property Issues and Federal Equalization of Burdens Office (cumulative data provided for two authorities)
- Federal Agency for Public Safety Digital Radio (BDBOS)
- Federal Agency for Technical Relief
- Federal Institute for Population Research
- Federal Institute of Sport Science
- Federal Criminal Police Office
- Federal Police (cumulative data provided for 12 authorities)
- Federal Police Headquarters
- Federal Office of Administration
- Federal Agency for Civic Education
- Federal University of Applied Administrative Sciences
- Federal Statistical Office
- Central Office for Information Technology in the Security Sector (founded 6 April 2017)

Within the remit of the Federal Ministry of Justice and Consumer Protection

- Federal Office of Justice
- Federal Finance Court
- Federal Court of Justice
- Federal Patent Court
- Federal Administrative Court
- Public Prosecutor General of the Federal Court of Justice
- German Patent and Trade Mark Office

Within the remit of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety

- Asse-GmbH, a federally owned company for the operation and decommissioning of the Asse II repository¹⁷ (merged with the Bundesgesellschaft für Endlagerung mbH (the federal agency for nuclear waste disposal, BGE) effective 20 December 2017).
- BGZ Gesellschaft für Zwischenlagerung mbH (the federal agency for interim waste storage) (founded: March 2017; the Federation is the sole shareholder effective 1 August 2017).
- Federal Office for Building and Regional Planning
- Federal Office for the Safety of Nuclear Waste Management
- Federal Agency for Nature Conservation
- Federal Office for Radiation Protection
- Bundesgesellschaft für Endlagerung mbH (the federal agency for nuclear waste disposal, BGE)¹⁸
- Federal Foundation for Baukultur
- Deutsche Gesellschaft zum Bau und Betrieb von Endlagern für Abfallstoffe mbH (the German society for the construction and operation of waste repositories, DBE)¹⁹ (the Federation is the sole shareholder effective 20 December 2017).
- Federal Environmental Agency
- Zukunft - Umwelt - Gesellschaft (ZUG) gGmbH (founded: September 2017)

Within the remit of the Federal Ministry of Transport and Digital Infrastructure

- Federal Office for Goods Transport
- Federal Maritime and Hydrographic Agency
- Federal Institute of Hydrology
- Federal Highway Research Institute
- Federal Agency for Administrative Services
- Federal Waterways Engineering and Research Institute

¹⁷ Data was submitted on a different date, last revised: 20 December 2017; reason: merger with other facilities.

¹⁸ Data was submitted on a different date, last revised: 20 December 2017; reason: merger with other facilities.

¹⁹ Data was submitted on a different date, last revised: 20 December 2017; reason: merger with other facilities.

- Federal Supervisory Authority for Air Navigation Services
- Federal Railway Property Agency
- German Federal Bureau of Aircraft Accident Investigation
- Federal Bureau of Maritime Casualty Investigation
- German Meteorological Service
- DFS Deutsche Flugsicherung GmbH
- Federal Railway Authority
- Federal Waterways and Shipping Agency
- Central Command for Maritime Emergencies
- Federal Motor Transport Authority
- Federal Aviation Office
- NOW GmbH – National Organization for Hydrogen and Fuel Cell Technology
- VIFG mbH – Germany’s Transport Infrastructure Financing Company
- Offices for waterways and shipping and offices for new construction (cumulative data provided for 46 authorities).

Within the remit of the Federal Ministry for Economic Affairs and Energy

- Federal Office for Economic Affairs and Export Control
- Federal Institute for Geosciences and Natural Resources
- Federal Institute for Materials Research and Testing
- Federal Cartel Office
- Federal Network Agency
- Federal Institute of Physics and Metrology (PTB)

Annex 2: Implementation of the Directive by the supreme federal authorities

Table a: Areas of activity especially vulnerable to corruption and risk analyses

Name of the supreme federal authority	Number of staff as at 31 December 2017	Year of the most recent full review or update of all areas of activity especially vulnerable to corruption	Data on areas of activity especially vulnerable to corruption are based on updates (U), full review (R), on both (B), or are available only for a certain area of the authority (A).	Number of staff employed in areas of activity especially vulnerable to corruption	Number of jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses actually conducted
AA	13,469	2017	R	6,635	6,635	6,635
BfDI	120	2012 or earlier	U	39	0	0
BKAmt	692	2017	U	88	89	89
BKM	279	2016	B	129	143	143
BMAS	1,218	2017	U	181	181	181
BMBF	1,172	2016	U	151	14	14
BMEL	987	2012 or earlier	R	102	0	0
BMF	1,816	2016	B	212	149	149
BMFSFJ	728	2012 or earlier	R	189	0	0
BMG	695	2016	R	158	91	91
BMI	1,571	2015	B	463	463	463
BMJV	793	2017	R	387	387	387
BMUB	1,312	2013	U	212	60	60
BMVI	1,452	2015	R	257	158	158
BMVg	2,223	2017	A	767	767	767
BMWi	1,702	2017	U	604	0	0
BMZ	1,121	2016	B	298	304	304
BPA	523	2015	R	96	96	96
BPrA	211	2016	U	45	45	45
BR	210	2014	B	20	20	0
BRH	275	2013	U	40	40	40
BT	2,572	2017	U	308	308	308
BVerfG	274	2015	A	0	0	0

Table b: Staff rotation in areas of activity especially vulnerable to corruption

Name of the supreme federal authority	Number of staff working in areas of activity especially vulnerable to corruption	Number of these staff having worked for more than five years in the same or similar areas of activity especially vulnerable to corruption	Number of these staff for whom compensatory measures were taken to reduce the risk	Reasons for the failure to rotate ("X": applies to this authority.)					
				Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff members shortly before retirement from active service	Staff members soon to be transferred to another organizational unit	Staff members without a suitable replacement position at the same pay level	Other reasons
AA	6,635	1,756	1,756	X	X	X	X		X
BfDI	39	26	0	X					
BKAmt	88	30	30	X	X	X		X	
BKM	129	42	42	X	X	X	X	X	X
BMAS	181	n.s.							
BMBF	151	59	9	X	X	X	X		X
BMEL	102	n.s.							
BMF	212	56	56	X	X	X	X	X	X
BMFSFJ	189	n.s.							
BMG	158	n.s.							
BMI	463	158	100	X	X	X	X	X	X
BMJV	387	n.s.							
BMUB	212	63	0	X	X	X	X	X	X
BMVI	257	n.s.							
BMVg	767	n.s.							
BMW _i	604	167	167	X	X	X		X	
BMZ	298	40	28	X	X	X	X		
BPA	96	48	44	X	X	X			
BPrA	45	20	0	X				X	X
BR	20	10	0					X	
BRH	40	16	16	X	X				X
BT	308	54	49	X	X	X		X	X
BVerfG	0	n.a.							

Table c: Other measures taken to compensate for the failure to rotate²⁰

Name of the supreme federal authority	Extending the principle of greater scrutiny	Working in teams	Change in tasks within an organizational unit (although this does not correspond to rotation as described above)	Transferring responsibilities (with compensatory effect in terms of corruption risks)	Intensifying administrative and task-related supervision	Other measures
AA	X		X	X	X	X
BfDI	n.a.					
BKAmt	X		X		X	
BKM	X	X	X		X	X
BMAS	n.s.					
BMBF	X	X			X	X
BMEL	n.s.					
BMF	X	X	X	X	X	X
BMFSFJ	n.s.					
BMG	n.s.					
BMI	X	X	X	X	X	X
BMJV	n.s.					
BMUB	n.a.					
BMVI	n.s.					
BMVg	n.s.					
BMWi	X	X	X		X	
BMZ	X	X	X	X	X	
BPA	X	X			X	
BPrA	n.a.					
BR	n.a.					
BRH					X	X
BT	X		X	X	X	
BVerfG	n.a.					

²⁰“X”: applies to this authority.

Table d: Special regulations (applicable within the authority or to cooperation with the executive agencies)

Name of the supreme federal authority	The authority has special regulations ... ("X": applies to this authority.)			In relation to executive agencies / other agencies, regulations apply for cooperation ... ("X": applies to this authority)			
	... on monitoring staff performance of duties (administrative supervision)	... on monitoring lawfulness and expedience (task-related supervision)	... that are applied especially in all or some fields of areas of activity especially vulnerable to corruption ²¹	... on how to deal with cases of suspected corruption	... requiring cases of suspected corruption to be reported	... requiring regular reports on the implementation of the directive on corruption prevention to be provided to the supreme federal authority	... requiring other measures of administrative and task-related supervision
AA	X	X	X	X	X	X	X
BfDI				n.a.			
BKAmt	X	X	X	n.a.			
BKM							
BMAS	X	X	X			X	X
BMBF			X				
BMEL	X	X	X	X	X	X	X
BMF	X	X	X		X	X	X
BMFSFJ	X	X		n.a.			
BMG						X	X
BMI	X	X	X	X	X	X	X
BMJV		X	X	X	X	X	X
BMUB	X	X	X	X	X		X
BMVI	X	X	X	X	X	X	X
BMVg	X	X	X	X	X	X	X
BMW _i	X	X	X	X	X		
BMZ	X	X	X	n.a.			
BPA				n.a.			
BPrA			X	n.a.			
BR				n.a.			
BRH			X	n.a.			
BT	X	X	X	n.a.			
BVerfG	X	X		n.a.			

²¹ Examples include special tests, special conditions for awarding contracts and the publication of risk atlases.

Table e: Principle of greater scrutiny and transparency

Name of the supreme federal authority	Measures taken to support the principle of greater scrutiny and transparency ("X": applies to this authority.)			IT-assisted workflows which (perhaps in addition to other advantages) also ensure compliance with the principle of greater scrutiny, are used for... ²² ("X": applies to this authority.)						
	Second staff member checking work results	Plausibility checks	IT-assisted workflows	...procurement measures	... awarding funds (institutional funding; project funding)	... settling government aid covering medical treatment and care of civil servants	... settling travel expenses	... other measures with budgetary or other financial impact	... issuing other administrative acts or administrative acts relevant to the public	... other processes
AA	X	X	X	X	X			X	X	X
BfDI		X	X	X						X
BKAmt	X	X	X	X				X		
BKM	X	X	X				X	X		
BMAS	X	X	X	X			X			
BMBF	X	X	X	X	X		X	X		
BMEL	X	X	X	X	X		X	X		
BMF	X	X	X	X				X		
BMFSFJ	X	X	X	X	X		X	X		
BMG	X	X	X	X			X	X		
BMI	X	X	X	X	X		X	X		X
BMJV	X	X	X				X			
BMUB	X	X	X		X		X			
BMVI	X	X	X	X			X	X		
BMVg	X	X	X	X	X	X	X	X	X	X
BMW i	X	X	X	X	X	X	X	X		
BMZ	X	X	X	X						
BPA	X	X	X							X
BPrA	X	X								
BR		X	X	X			X			
BRH	X	X	X	X			X	X		
BT	X	X	X				X	X		X
BVerfG	X	X								

²² Some authorities have other authorities assume these tasks; no X was used in these cases, even if the delegated authority uses IT-assisted workflows.

Table f: Contacts between the contact persons for corruption prevention and the authority's executive level

Name of the supreme federal authority	Reason for contacts between the contact person for corruption prevention and the authority's executive level ("X": applies to this authority.)			Frequency of regular contacts between the contact person and the authority's executive level ("X": applies to this authority.)		
	No specific reason (e.g. as regular meetings or a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Contacts with and without specific reason	Once a month or more often	Less than once a month, but at least once every six months	Less than once every six months, but at least once a year
AA			X			X
BfDI			X			
BKAmt	X				X	
BKM			X			X
BMAS	X				X	
BMBF		X				
BMEL	X					X
BMF		X				
BMFSFJ	No contacts within the reporting year.					
BMG	No contacts within the reporting year.					
BMI	X				X	
BMJV	No contacts within the reporting year.					
BMUB	No contacts within the reporting year.					
BMVI	X				X	
BMVg		X		X		
BMW _i	X				X	
BMZ		X				
BPA		X				
BPrA	X				X	
BR	No contacts within the reporting year.					
BRH	No contacts within the reporting year.					
BT	X			X		
BVerfG		X				

Annex 3: Implementation of the Directive by the executive agencies of the federal ministries

Table a: Areas of activity especially vulnerable to corruption and risk analyses

Remit	Level of the authority	Number of authorities as at 31 December 2017	Number of staff as at 31 December 2017	Number of authorities with available data on areas of activity especially vulnerable to corruption	Number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of areas of activity especially vulnerable for which a risk analysis was considered necessary	Number of risk analyses carried out
AA	Multiple levels	1	358	1	48	47	46
BKM	Higher federal authorities	2	2,199	2	126	80	80
BKM	Legal person under private law	2	574	1	92 (3)	92	92
BKM	Multiple levels	15	3,508	14	428 (184)	265	93
BMAS	Higher federal authorities	1	591	1	383	367	367
BMAS	Federal courts	2	361	2	15	15	6
BMAS	Multiple levels	4	38,680	3	3,499 (10,196)	3,499	2,466
BMBF	Multiple levels	1	630	1	87	0	0
BMEL	Higher federal authorities	6	4,548	6	395	104	102
BMEL	Legal person under private law	1	209	0	(209)	-	-

Remit	Level of the authority	Number of authorities as at 31 December 2017	Number of staff as at 31 December 2017	Number of authorities with available data on areas of activity especially vulnerable to corruption	Number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of areas of activity especially vulnerable for which a risk analysis was considered necessary	Number of risk analyses carried out
BMEL	Multiple levels	2	2,292	2	878	32	6
BMF	Higher federal authorities	2	2,267	2	1,534	85	85
BMF	Legal person under private law	4	1,836	4	517	31	9
BMF	Multiple levels	6	12,617	5	3,766 (114)	4,705	4,701
BMF (Customs Administration)	Higher federal authorities	1	6,747	1	112	0	0
BMF (Customs Administration)	Lower-level federal authorities	51	32,620	51	997	30	27
BMFSFJ	Higher federal authorities	2	1,417	2	379	331	325
BMG	Higher federal authorities	5	3,440	5	950	620	473
BMI	Higher federal authorities	14	28,059	14	9,886	4,971	4,143
BMI	Lower-level federal authorities	12	35,891	12	1,754	1,528	1,528
BMI	Multiple levels	4	549	3	210 (4)	210	210

Remit	Level of the authority	Number of authorities as at 31 December 2017	Number of staff as at 31 December 2017	Number of authorities with available data on areas of activity especially vulnerable to corruption	Number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of areas of activity especially vulnerable for which a risk analysis was considered necessary	Number of risk analyses carried out
BMJV	Higher federal authorities	2	3,552	2	1,515	1,358	1,515
BMJV	Federal courts	4	866	4	210	103	97
BMJV	Multiple levels	1	275	1	114	114	114
BMUB	Higher federal authorities	5	3,863	5	2,721	1,618	284
BMUB	Legal person under private law	5	1,738	1	31 (1,255)	10	3
BMUB	Multiple levels	1	7	0	(7)		
BMVI	Higher federal authorities	14	9,458	12	3,757 (268)	1,313	1,257
BMVI	Mid-level federal authorities	1	894	1	338	159	159
BMVI	Lower-level federal authorities	46	11,141	46	3,323	1,751	1,751
BMVI	Legal person under private law	3	5,440	1	393 (21)	12	12
BMVI	Multiple levels	1	692	1	40	19	19
BMVg	Higher federal authorities	21	22,275	16	2,296 (3,925)	2,228	2,119

Remit	Level of the authority	Number of authorities as at 31 December 2017	Number of staff as at 31 December 2017	Number of authorities with available data on areas of activity especially vulnerable to corruption	Number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of areas of activity especially vulnerable for which a risk analysis was considered necessary	Number of risk analyses carried out
BMVg	Mid-level federal authorities	96	37,130	84	682 (14,288)	479	373
BMVg	Lower-level federal authorities	555	143,786	255	2,434 (91,012)	1.189	981
BMVg	Federal courts	2	41	2	1	1	1
BMVg	Legal person under private law	5	5,366	3	149 (4,285)	34	34
BMWi	Higher federal authorities	6	8,202	6	3,063	565	439

Table b: Update of the data basis on areas of activity especially vulnerable to corruption

Remit	Level of the authority	Number of authorities which updated their data on areas of activity especially vulnerable to corruption in ... (in brackets: number of staff at this authority as at 31 December 2017)			
		2017	2016/2015	2014/2013	2012 or earlier
AA	Multiple levels				1 (358)
BKM	Higher federal authorities	1 (1,522)	1 (677)		
BKM	Legal person under private law	1 (571)			
BKM	Multiple levels	7 (1,005)	3 (2,164)	3 (95)	1 (60)
BMAS	Higher federal authorities				1 (591)
BMAS	Federal courts		1 (192)		1 (169)
BMAS	Multiple levels	1 (5,015)	1 (22,755)	1 (714)	
BMBF	Multiple levels		1 (630)		
BMEL	Higher federal authorities	1 (1,255)	1 (291)	3 (2,193)	1 (809)
BMEL	Legal person under private law				
BMEL	Multiple levels		1 (1,348)	1 (944)	
BMF	Higher federal authorities	1 (20)	1 (2,247)		
BMF	Legal person under private law	3 (1,591)	1 (245)		
BMF	Multiple levels	2 (5,332)	1 (133)	1 (6,636)	1 (402)

Remit	Level of the authority	Number of authorities which updated their data on areas of activity especially vulnerable to corruption in ... (in brackets: number of staff at this authority as at 31 December 2017)			
		2017	2016/2015	2014/2013	2012 or earlier
BMF (Customs Administration)	Higher federal authorities		1 (6,747)		
BMF (Customs Administration)	Lower-level federal authorities		51 (32,620)		
BMFSFJ	Higher federal authorities			1 (1,395)	1 (22)
BMG	Higher federal authorities			4 (2,664)	1 (776)
BMI	Higher federal authorities	2 (495)	3 (559)	3 (9,006)	6 (17,999)
BMI	Lower-level federal authorities	12 (35,891)			
BMI	Multiple levels	2 (83)	1 (462)		
BMJV	Higher federal authorities	1 (2,514)	1 (1,038)		
BMJV	Federal courts	1 (189)	1 (181)	2 (496)	
BMJV	Multiple levels	1 (275)			
BMUB	Higher federal authorities	3 (2,314)			2 (1,549)
BMUB	Legal person under private law			1 (483)	
BMUB	Multiple levels				
BMVI	Higher federal authorities	2 (2,550)	2 (2,930)	6 (1,944)	2 (1,766)

Remit	Level of the authority	Number of authorities which updated their data on areas of activity especially vulnerable to corruption in ... (in brackets: number of staff at this authority as at 31 December 2017)			
		2017	2016/2015	2014/2013	2012 or earlier
BMVI	Mid-level federal authorities			1 (894)	
BMVI	Lower-level federal authorities	46 (11,141)			
BMVI	Legal person under private law	2 (5,419)			
BMVI	Multiple levels	1 (692)			
BMVg	Higher federal authorities	4 (n.s.)	5 (n.s.)	3 (n.s.)	4 (n.s.)
BMVg	Mid-level federal authorities	37 (n.s.)	28 (n.s.)	15 (n.s.)	2 (n.s.)
BMVg	Lower-level federal authorities	103 (n.s.)	152 (n.s.)	26 (n.s.)	30 (n.s.)
BMVg	Federal courts	1 (n.s.)	1 (n.s.)		
BMVg	Legal person under private law	2 (n.s.)		1 (n.s.)	
BMWi	Higher federal authorities	4 (5,852)	1 (2,005)		1(345)

Table c: Staff rotation in the executive agencies

Remit	Level of the authority	Number of authorities for which relevant data are available	Number of staff in these authorities	Number of these staff having worked for more than five years in the same or similar areas of activity especially vulnerable to corruption (where data are available)	Number of these staff for whom compensatory measures were taken to reduce the risk	Reason for failure to rotate (number of authorities stating the respective reason)*) In terms of data collection, some authorities were treated as groups. "X": applies to the group.					
						Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable replacement position at the same pay level	Other reasons
AA	Multiple levels	1	358	28	28	1	1			1	
BKM	Higher federal authorities	1	1,522	15	0	1	1		1	1	1
BKM	Legal person under private law	1	571	67	67	1	1	1		1	
BKM	Multiple levels	11	3,237	268	24	10	7	2	1	6	
BMAS	Higher federal authorities	0	-	-	-	-	-	-	-	-	-
BMAS	Federal courts	1	169	14	14	1	1			1	
BMAS	Multiple levels	1	714	119	119	1	1	1			
BMBF	Multiple levels	1	630	50	0	1	1			1	
BMEL	Higher federal authorities	3	2,572	71	71	1	1		1	1	1

Remit	Level of the authority	Number of authorities for which relevant data are available	Number of staff in these authorities	Number of these staff having worked for more than five years in the same or similar areas of activity especially vulnerable to corruption (where data are available)	Number of these staff for whom compensatory measures were taken to reduce the risk	Reason for failure to rotate (number of authorities stating the respective reason)* In terms of data collection, some authorities were treated as groups. "X": applies to the group.					
						Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable replacement position at the same pay level	Other reasons
BMEL	Legal person under private law	0	-	-	-	-	-	-	-	-	-
BMEL	Multiple levels	0	-	-	-	-	-	-	-	-	-
BMF	Higher federal authorities	1	20	3	3	1	1				
BMF	Legal person under private law	4	1,836	101	85	4	4	1	1	2	2
BMF	Multiple levels	4	9,773	1,164	1,159	4	4	2	1	2	3
BMF (Customs Administration)	Higher federal authorities	1	6,747	42	42	X	X	-		X	
BMF (Customs Administration)*	Lower-level federal authorities	51	32,620	289	219	X	X	X	X	X	X

Remit	Level of the authority	Number of authorities for which relevant data are available	Number of staff in these authorities	Number of these staff having worked for more than five years in the same or similar areas of activity especially vulnerable to corruption (where data are available)	Number of these staff for whom compensatory measures were taken to reduce the risk	Reason for failure to rotate (number of authorities stating the respective reason)*) In terms of data collection, some authorities were treated as groups. "X": applies to the group.					
						Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable replacement position at the same pay level	Other reasons
BMVI	Higher federal authorities	5	3,597	220	220	5	3	3	1	3	
BMVI	Mid-level federal authorities	1	894	320	250	1	1	1	1	1	1
BMVI*	Lower-level federal authorities	46	11,141	2,235	1,798	X	X		X	X	X
BMVI	Legal person under private law	1	33	6	0	1	1				
BMVI	Multiple levels	1	692	28	28	1	1	1	1	1	
BMVg	Higher federal authorities	7	n.s.	33	12	5	3	1	1	4	2
BMVg	Mid-level federal authorities	37	n.a.	57	37	9	11	3	1	7	3
BMVg	Lower-level federal authorities	80	n.s.	701	443	32	47	12	3	28	34
BMVg	Federal courts	1	n.s.	1	0	1					
BMVg	Legal person under private law	1	n.s.	18	18	1	1				1
BMW _i	Higher federal authorities	5	6,197	534	511	4	4	1	1	4	2

Table d: Other measures taken to compensate for the failure to rotate

Current data are available only for the remits and levels listed

Remit	Level of authority (in brackets: number of authorities for which data on compensatory measures are available)	Number of authorities stating that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.					
		Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruption risks)	Intensifying administrative and task-related supervision	Other measures
AA	Multiple levels (1)	1				1	
BKM	Legal person under private law (1)	1	1			1	1
BKM	Multiple levels (6)	5	2		1	5	
BMAS	Federal courts (1)	1		1		1	
BMAS	Multiple levels (1)	1	1			1	
BMEL	Higher federal authorities (3)	3	1			1	1
BMF	Higher federal authorities (1)	1	1			1	1
BMF	Legal person under private law (4)	4	2	1	1	4	3
BMF	Multiple levels (3)	3	2	1	2	3	2

Remit	Level of authority (in brackets: number of authorities for which data on compensatory measures are available)	Number of authorities stating that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.					
		Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruption risks)	Intensifying administrative and task-related supervision	Other measures
BMF (Customs Administration)	Higher federal authorities (1)	X		X	X	X	
BMF (Customs Administration)*	Lower-level federal authorities (51)	X	X	X	X	X	X
BMFSFJ	Higher federal authorities (1)	1	1			1	
BMG	Higher federal authorities (2)	2	2	1	1	1	
BMI	Higher federal authorities (5)	5	4	3	3	3	2
BMI	Multiple levels (1)	1				1	
BMJV	Higher federal authorities (2)	2	1	1		2	2
BMJV	Federal courts (3)	3			1	2	1
BMUB	Higher federal authorities (3)	3	2	2	2	2	

Remit	Level of authority (in brackets: number of authorities for which data on compensatory measures are available)	Number of authorities stating that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.					
		Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruption risks)	Intensifying administrative and task-related supervision	Other measures
BMVI	Higher federal authorities (5)	5	3	3	2	3	1
BMVI*	Lower-level federal authorities (46)	X	X	X	X	X	X
BMVI	Multiple levels (1)	1	1		1	1	
BMVg	Higher federal authorities (n.s.)	1		1		1	1
BMVg	Mid-level federal authorities (n.s.)	8	2		1	10	1
BMVg	Lower-level federal authorities (n.s.)	34	16	4	6	36	28
BMVg	Legal person under private law (n.s.)		1		1	1	1
BMW i	Higher federal authorities (4)	4	2	4	1	4	1

Table e: Special regulations; administrative and task-related supervision

Remit	Number of authorities which have special regulations ...			Number of authorities which exercise task-related supervision of other authorities	Number of authorities which have regulations on cooperation with the executive agencies / bodies ...			
	... on monitoring staff performance of duties (administrative supervision)	... on monitoring lawfulness and expedience (task-related supervision)	... that are applied especially in all or some fields of activity especially vulnerable to corruption		... on how to deal with cases of suspected corruption	... requiring cases of suspected corruption to be reported	... requiring executive agencies / bodies of the supervisory authority to provide regular reports on the implementation of the directive on corruption prevention	... requiring other measures of administrative and task-related supervision
AA	0	1	1	0	-			
BKM	5	4	4	0	-			
BMAS	5	5	5	1				
BMBF	0	0	0	0	-			
BMEL	6	6	5	0	-			
BMF	8	7	10	1				1
BMF (Customs Administration)	52	52	52	1	1	1	1	1
BMFSFJ	1	1	0	0	-			
BMG	3	3	4	0	-			
BMI	22	23	21	1	1	1	1	1
BMJV	4	4	6	0	-			
BMUB	6	6	6	1	1	1		1
BMVI	62	62	58	3	2	2	2	3
BMVg	499	298	77	191	115	122	59	66
BMWi	4	3	4	0	-			

Table f: Principle of greater scrutiny and transparency

Remit	Number of authorities where the following measures were taken to support the principle of greater scrutiny and transparency			Number of authorities with IT-assisted workflows for... (Please note: Some authorities have other authorities assume these tasks completely; in these cases, the delegating authority was not counted even if the delegated authority uses IT-assisted workflows.)						
	Second staff member checking work results; plausibility checks; IT-assisted workflows	Plausibility checks	IT-assisted workflows	... procurement measures	... awarding funds (institutional funding; project funding)	... settling benefit claims pursuant to civil service law	... settling travel expenses	... other measures with budgetary or other financial impact	... enacting other administrative acts or administrative decisions relevant to the public	... other processes
AA	1	1	1					1		
BKM	18	15	8	6	2	1	5	6	1	4
BMAS	7	7	7	5		2	4	6	3	
BMBF	1	1	1	1	1	1	1	1		1
BMEL	8	8	8	7	2	2	5	3	1	5
BMF	11	10	8	7	1	1	4	4	3	7
BMF (Customs Administration)	52	52	52	52	51	1	52	52	51	52
BMFSFJ	2	2	1	1	1					
BMG	5	4	5	3	1	1	3	3	2	2
BMI	27	29	27	25	5	14	19	25	18	17
BMJV	6	7	5	4			3	4	4	2
BMUB	10	11	10	10	2	3	9	6	1	4
BMVI	61	65	64	60	50	2	63	56	51	53
BMVg	429	435	479	290	36	61	246	356	24	153
BMW i	6	5	6	6	1	1	5	6	3	1

Table g: Contact person for corruption prevention

Remit	Level of the authority	Number of authorities that have their own contact person/ Number of staff in these authorities (If a contact person has been allocated to a group of authorities, it is covered by this section.)	Number of authorities where the contact person belongs to another authority/ Number of staff in these authorities	Number of authorities without their own contact person/ Number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)...			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
					... no specific reason (e.g. as regular meetings or a general report or exchange on corruption prevention).	... exclusively for a specific reason (e.g. a case of suspected corruption).	... contacts with and without specific reason.	Once a month or more often	Less than once a month, but at least once every six months	Less than once every six months, but at least once a year
AA	Multiple levels	1/358	-	-	1	-	-	-	-	1
BKM	Higher federal authorities	2/2,199	-	-	-	1	1	-	-	1
BKM	Legal person under private law	2/574	-	-	2	-	-	-	1	1
BKM	Multiple levels	15/3,508	-	-	11	1	2	4	7	2
BMAS	Higher federal authorities	1/591	-	-	1	-	-	-	1	-
BMAS	Federal courts	2/361	-	-	2	-	-	-	2	-
BMAS	Multiple levels	4/38,680	-	-	4	-	-	1	3	-
BMBF	Multiple levels	1/630	-	-	1	-	-	-	1	-
BMEL	Higher federal authorities	6/4,548	-	-	4	1	1	-	2	3

Remit	Level of the authority	Number of authorities that have their own contact person/ Number of staff in these authorities (If a contact person has been allocated to a group of authorities, it is covered by this section.)	Number of authorities where the contact person belongs to another authority/ Number of staff in these authorities	Number of authorities without their own contact person/ Number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)...			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
					... no specific reason (e.g. as regular meetings or a general report or exchange on corruption prevention).	... exclusively for a specific reason (e.g. a case of suspected corruption).	... contacts with and without specific reason.	Once a month or more often	Less than once a month, but at least once every six months	Less than once every six months, but at least once a year
BMEL	Legal person under private law	1/209	-	-	1	-	-	-	1	-
BMEL	Multiple levels	2/2,292	-	-	1	-	-	-	-	1
BMF	Higher federal authorities	2/2,267	-	-	2	-	-	1	1	-
BMF	Legal person under private law	4/1,836	-	-	4	-	-	1	3	-
BMF	Multiple levels	6/12,617	-	-	2	1	3	-	4	1
BMF (Customs Administration)	Higher federal authorities	1/6,747	-	-	-	-	1	1	-	-
BMF (Customs)	Lower-level federal authorities	51/32,620	-	-	-	-	51	51	-	-

Remit	Level of the authority	Number of authorities that have their own contact person/ Number of staff in these authorities (If a contact person has been allocated to a group of authorities, it is covered by this section.)	Number of authorities where the contact person belongs to another authority/ Number of staff in these authorities	Number of authorities without their own contact person/ Number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)...			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
					... no specific reason (e.g. as regular meetings or a general report or exchange on corruption prevention).	... exclusively for a specific reason (e.g. a case of suspected corruption).	... contacts with and without specific reason.	Once a month or more often	Less than once a month, but at least once every six months	Less than once every six months, but at least once a year
BMUB	Higher federal authorities	4/3,743	1/120	-	3	-	1	1	2	1
BMUB	Legal person under private law	3/1,552	1/184	-	1	-	1	2	-	-
BMUB	Multiple levels	1/7	-	-	1	-	-	1	-	-
BMVI	Higher federal authorities	12/9,190	2/268	-	6	-	5	2	7	2
BMVI	Mid-level federal authorities	1/894	-	-	-	-	1	-	-	1
BMVI	Lower-level federal authorities	-	46/11,141	-	-	-	-	-	-	-
BMVI	Legal person under private law	3/5,440	-	-	3	-	-	1	1	1
BMVI	Multiple levels	1/692	-	-	1	-	-	-	1	-
BMVg	Higher federal authorities	19/n.s.	-	2/n.s.	10	2	4	5	7	3

Remit	Level of the authority	Number of authorities that have their own contact person/ Number of staff in these authorities (If a contact person has been allocated to a group of authorities, it is covered by this section.)	Number of authorities where the contact person belongs to another authority/ Number of staff in these authorities	Number of authorities without their own contact person/ Number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)...			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
					... no specific reason (e.g. as regular meetings or a general report or exchange on corruption prevention).	... exclusively for a specific reason (e.g. a case of suspected corruption).	... contacts with and without specific reason.	Once a month or more often	Less than once a month, but at least once every six months	Less than once every six months, but at least once a year
BMVg	Mid-level federal authorities	8/n.s.	83/n.s.	-	48	7	25	37	25	13
BMVg	Lower-level federal authorities	277/n.s.	244/n.s.	34/n.s.	215	11	47	92	127	38
BMVg	Federal courts	1	-	1/n.s.	-	-	-	-		
BMVg	Legal person under private law	4/n.s.	-	1/n.s.	1	-	3	3	1	-
BMWi	Higher federal authorities	6/8,202	-	-	3	1	1	1	2	1

Table h: Corruption awareness and training

Remit	Level of the authority	Corruption-awareness measures, including training, conducted in the 2017 calendar year			Corruption-awareness measures applied – other than training (number of authorities) *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.							Training offered in the 2017 calendar year (number of staff trained)
		Number of staff who received corruption-awareness training	Number of staff working in jobs especially vulnerable to corruption who received corruption-awareness training (if statistical data are available)	Number of supervisors and managers who received corruption-awareness training	Discussion with supervisors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – not training – during staff events (such as orientation for new staff)	IT-assisted options (not training)	Handing out information material (rather than simply displaying it)	Other measures	
AA	Multiple levels	358	48	57	-	1	-	1	-	1	-	1
BKM	Higher federal authorities	315	83	30	1	1	-	1	-	2	1	99
BKM	Legal person under private law	174	92	63	2	1	1	1		1	1	66
BKM	Multiple levels	568	97	109	6	9	4	7	2	2	2	94
BMAS	Higher federal authorities	591	383	63	-	1	1	1	-	1	-	44
BMAS	Federal courts	169	15	20	1	1	-	-	-	-	-	-
BMAS	Multiple levels	14,062	3,291	41	3	3	2	3	1	1	1	105

Remit	Level of the authority	Corruption-awareness measures, including training, conducted in the 2017 calendar year			Corruption-awareness measures applied – other than training (number of authorities) *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.							Training offered in the 2017 calendar year (number of staff trained)
		Number of staff who received corruption-awareness training	Number of staff working in jobs especially vulnerable to corruption who received corruption-awareness training (if statistical data are available)	Number of supervisors and managers who received corruption-awareness training	Discussion with supervisors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – not training – during staff events (such as orientation for new staff)	IT-assisted options (not training)	Handing out information material (rather than simply displaying it)	Other measures	
BMBF	Multiple levels	630	87	47	-	1	1	1	1	-	-	-
BMEL	Higher federal authorities	773	107	230	1	3	1	4	2	2	2	2
BMEL	Legal person under private law	0										-
BMEL	Multiple levels	187	187	4	-	1	-	-	-	1	-	187
BMF	Higher federal authorities	1,306	1,008	200	2	2	2	1	1	1	1	11
BMF	Legal person under private law	1,711	516	153	2	3	-	1	-	2	1	245
BMF	Multiple levels	7,465	3,156	690	3	5	-	3	2	3	4	1,085

Remit	Level of the authority	Corruption-awareness measures, including training, conducted in the 2017 calendar year			Corruption-awareness measures applied – other than training (number of authorities) *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.							Training offered in the 2017 calendar year (number of staff trained)
		Number of staff who received corruption-awareness training	Number of staff working in jobs especially vulnerable to corruption who received corruption-awareness training (if statistical data are available)	Number of supervisors and managers who received corruption-awareness training	Discussion with supervisors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – not training – during staff events (such as orientation for new staff)	IT-assisted options (not training)	Handing out information material (rather than simply displaying it)	Other measures	
BMF (Customs Administration)	Higher federal authorities	157	2	16	X	X	-	X	-	-	-	-
BMF* (Customs Administration)	Lower-level federal authorities	8,784	297	320	X	X	X	X	X	X	X	51
BMFSFJ	Higher federal authorities	364	106	47	2	1	-	2	1	1	1	26
BMG	Higher federal authorities	2,078	700	86	1	5	1	4	3	4	1	9
BMI	Higher federal authorities	8,929	5,900	450	9	10	7	9	5	10	3	961

Remit	Level of the authority	Corruption-awareness measures, including training, conducted in the 2017 calendar year			Corruption-awareness measures applied – other than training (number of authorities) *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.							Training offered in the 2017 calendar year (number of staff trained)
		Number of staff who received corruption-awareness training	Number of staff working in jobs especially vulnerable to corruption who received corruption-awareness training (if statistical data are available)	Number of supervisors and managers who received corruption-awareness training	Discussion with supervisors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – not training – during staff events (such as orientation for new staff)	IT-assisted options (not training)	Handing out information material (rather than simply displaying it)	Other measures	
BMI*	Lower-level federal authorities	11,049	1,387	1,610	X	X	X	X	X	X	X	3,416
BMI	Multiple levels	168	66	10	1	2	1	3	-	3	-	1
BMJV	Higher federal authorities	2,206	1,504	368	2	2	2	1	2	1	1	796
BMJV	Federal courts	842	210	97	2	1	-	2	2	3	1	28
BMJV	Multiple levels	275	114	29	-	-	-	-	-	-	1	-
BMUB	Higher federal authorities	1,885	1,463	176	4	4	2	4	3	3	1	159
BMUB	Legal person under private law	1,117	25	58	3	3	3	3	1	2	1	177

Remit	Level of the authority	Corruption-awareness measures, including training, conducted in the 2017 calendar year			Corruption-awareness measures applied – other than training (number of authorities) *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.							Training offered in the 2017 calendar year (number of staff trained)
		Number of staff who received corruption-awareness training	Number of staff working in jobs especially vulnerable to corruption who received corruption-awareness training (if statistical data are available)	Number of supervisors and managers who received corruption-awareness training	Discussion with supervisors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – not training – during staff events (such as orientation for new staff)	IT-assisted options (not training)	Handing out information material (rather than simply displaying it)	Other measures	
BMUB	Multiple levels	7	-	2	1	1	-	-	-	1	1	-
BMVI	Higher federal authorities	9,080	3,695	459	13	13	9	10	7	10	4	1,683
BMVI	Mid-level federal authorities	432	218	8	1	1	1	1	1	1	1	99
BMVI*	Lower-level federal authorities	5,333	1,399	473	X	X	X	X	X	X	X	453
BMVI	Legal person under private law	86	59	27	2	2	1	2	1	2	1	53
BMVI	Multiple levels	692	40	79	1	1	1	1	-	-	-	-
BMVg	Higher federal authorities	20,629	2,293	1,541	13	14	5	9	9	12	8	81

Remit	Level of the authority	Corruption-awareness measures, including training, conducted in the 2017 calendar year			Corruption-awareness measures applied – other than training (number of authorities) *) In terms of data collection, some authorities were treated as groups. "X": applies to the group.							Training offered in the 2017 calendar year (number of staff trained)
		Number of staff who received corruption-awareness training	Number of staff working in jobs especially vulnerable to corruption who received corruption-awareness training (if statistical data are available)	Number of supervisors and managers who received corruption-awareness training	Discussion with supervisors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – not training – during staff events (such as orientation for new staff)	IT-assisted options (not training)	Handing out information material (rather than simply displaying it)	Other measures	
BMVg	Mid-level federal authorities	26,920	582	1,697	53	57	10	31	41	42	13	672
BMVg	Lower-level federal authorities	92,596	1,688	7,487	171	177	29	201	74	225	128	2,632
BMVg	Federal courts	41	1	15	-	-	-	-	-	1	1	-
BMVg	Legal person under private law	259	36	41	4	3	1	4		4	3	211
BMWi	Higher federal authorities	2,481	102	108	4	5	2	3	1	1	2	131

Annex 4: Further development of corruption prevention measures

Total federal administration (not including the Federal Ministry of Defence and its remit)

Action	Number of (groups of) authorities which in 2017 ...		
	... planned (adopted) specific corruption-prevention measures	... launched corruption-prevention measures	... implemented corruption-prevention measures
New implementation directives	11	11	7
New training measures	144	30	7
Organizational measures	80	73	14
Area- and job-related measures	70	18	7
Ombudsperson	-	6	7
Electronic whistle-blowing option	5	7	8
Other	10	12	4

Federal Ministry of Defence and its remit

Action	Number of agencies which in 2017 ...		
	... planned (adopted) specific corruption-prevention measures	... launched corruption-prevention measures	... implemented corruption-prevention measures
New implementation directives	27	106	1
New training measures	76	92	7
Organizational measures	42	98	34
Area- and job-related measures	41	66	38
Ombudsperson	6	-	23
Electronic whistle-blowing option	43	85	22
Other	61	51	19