



Federal Ministry
of the Interior, Building
and Community

Prevention of Corruption in the Federal Administration

Annual report for 2018

As at: 14 August 2019

Contents

LIST OF ABBREVIATIONS.....	6
I. INTRODUCTION.....	8
II. CORRUPTION PREVENTION IN THE INTERNATIONAL CONTEXT	10
III. KEY DATA: AGENCIES AND STAFF INCLUDED IN THE REPORT	11
1. GENERAL NOTE.....	11
2. SCOPE OF THE REPORT	11
a) <i>General overview</i>	11
b) <i>Individual agencies</i>	12
IV. CASES OF SUSPECTED CORRUPTION.....	16
1. DEFINITIONS AND PROCEDURES	16
2. OVERVIEW OF NEW CASES	18
a) <i>Federal Foreign Office</i>	19
b) <i>Federal Ministry of Labour and Social Affairs</i>	19
c) <i>Federal Ministry of Finance</i>	19
d) <i>Federal Ministry of the Interior, Building and Community</i>	19
e) <i>Federal Ministry of Defence</i>	21
f) <i>Federal Ministry for Economic Affairs and Energy</i>	21
3. OVERVIEW OF CASES CLOSED.....	22
a) <i>Federal Foreign Office</i>	22
b) <i>Federal Ministry of Labour and Social Affairs</i>	22
c) <i>Federal Ministry of Finance</i>	22
d) <i>Federal Ministry of the Interior, Building and Community</i>	24
e) <i>Federal Ministry of Defence</i>	24
V. IMPLEMENTATION STATUS OF THE DIRECTIVE.....	25
1. AREAS OF ACTIVITY ESPECIALLY VULNERABLE TO CORRUPTION	25
a) <i>Identifying areas of activity especially vulnerable to corruption</i>	25
b) <i>Risk analysis</i>	26
2. ROTATION REQUIREMENT FOR AREAS OF ACTIVITY ESPECIALLY VULNERABLE TO CORRUPTION.....	27

a) Cases of suspected corruption and areas of activity especially vulnerable to corruption.....	27
b) Supreme federal authorities.....	28
c) Agencies within the remits of the federal ministries.....	28
3. ADMINISTRATIVE AND TASK-RELATED SUPERVISION.....	29
4. TRANSPARENCY AND THE PRINCIPLE OF GREATER SCRUTINY	30
5. CONTACT PERSON FOR CORRUPTION PREVENTION	31
6. STAFF AWARENESS.....	33
7. BASIC AND ADVANCED TRAINING.....	33
VI. GOOD PRACTICES.....	35
ANNEX OF TABLES.....	38
ANNEX 1 – AGENCIES INCLUDED IN THIS REPORT	38
Table a: Supreme federal authorities included in this report.....	38
Table b - Agencies within the remits of the federal ministries.....	38
ANNEX 2: IMPLEMENTATION OF THE DIRECTIVE BY THE SUPREME FEDERAL AUTHORITIES	44
Table a: Areas of activity especially vulnerable to corruption; risk analyses.....	44
Table b: Staff rotation in areas of activity especially vulnerable to corruption.....	45
Table c: Measures taken to compensate for the failure to rotate.....	46
Table d: Special regulations (applicable within the agency or to cooperation with subordinate agencies)47	
Table e: Principle of greater scrutiny and transparency	48
Table f: Contact between the contact persons for corruption prevention and agency management	49
Table g: Corruption awareness and training.....	50
ANNEX 3: IMPLEMENTATION OF THE DIRECTIVE BY THE AGENCIES WITHIN THE REMITS OF THE FEDERAL MINISTRIES	51
Table a: Areas of activity especially vulnerable to corruption; risk analyses.....	51
Table b: Update of the data basis on areas of activity especially vulnerable to corruption.....	53
Table c: Staff rotation in the agencies within the remits of the federal ministries.....	54
Table d: Measures taken to compensate for the failure to rotate	55
Table e: Special regulations; administrative and task-related supervision	56
Table f: Principle of greater scrutiny and transparency.....	57
Table g: Contact person for corruption prevention.....	58
Table h: Corruption awareness and training.....	59

ANNEX 4: FURTHER DEVELOPMENT OF CORRUPTION-PREVENTION MEASURES 60

List of abbreviations

AA	German Federal Foreign Office
ACWG	G20-Anti Corruption Working Group
Contact person(s)	Contact person(s) for corruption prevention
BBAINBw	Federal Office of Bundeswehr Equipment, Information Technology and In-Service Support
BAMF	Federal Office for Migration and Refugees
BBG	Bundesbeamtengesetz (Act on Federal Civil Servants)
BDG	Bundesdisziplargesetz (Federal Disciplinary Act)
BfDI	Federal Commissioner for Data Protection and Freedom of Information
BGE	Bundesgesellschaft für Endlagerung mbH (the federal company for nuclear waste disposal)
BImA	Federal Institute for Real Estate
bkA	Areas of activity especially vulnerable to corruption
BKAmt	Federal Chancellery
BKM	The Federal Government Commissioner for Culture and the Media
BMAS	Federal Ministry of Labour and Social Affairs
BMBF	Federal Ministry of Education and Research
BMEL	Federal Ministry of Food and Agriculture
BMF	The Federal Ministry of Finance
BMFSFJ	Federal Ministry for Family Affairs, Senior Citizens, Women and Youth
BMG	Federal Ministry of Health
BMI	Federal Ministry of the Interior, Building and Community
BMJV	Federal Ministry of Justice and Consumer Protection
BMU	Federal Ministry for the Environment, Nature Conservation and Nuclear Safety
BMVg	Federal Ministry of Defence
BMVI	Federal Ministry of Transport and Digital Infrastructure
BMWi	Federal Ministry for Economic Affairs and Energy
BMZ	Federal Ministry for Economic Cooperation and Development
BPA	Press and Information Office of the Federal Government
BPrA	Office of the Federal President
BR	Bundesrat
BRH	German SAI
BT	Bundestag
BVerfG	Federal Constitutional Court
BZSt	Federal Central Tax Office
Recommendations	Recommendations on Preventing Corruption in the Federal Administration (last revised: 9 February 2012)
EVZ	Foundation Remembrance, Responsibility and Future
FAQ	Frequently asked questions
FMSA	Federal Agency for Financial-Market Stabilization

GRECO	The Group of States against Corruption
Contact person handout	A handout containing instructions for contact persons for corruption prevention in cases of suspected corruption from 20 September 2013
KSchG	Act Governing Protection Against Dismissal
OECD	Organisation for Economic Cooperation and Development
Directive	Federal Government Directive concerning the Prevention of Corruption in the Federal Administration of 30 July 2004
StPO	Code of Criminal Procedure
UNCAC	United Nations Convention against Corruption
e.g.	Exempli gratia (for example)
ZIF	Center for International Peace Operations gGmbH

I. Introduction

As the result of various resolutions of the Auditing Committee, the Federal Ministry of the Interior, Building and Community reports annually to the Auditing Committee on the development and results of corruption prevention in the federal administration. The Committee discusses the report and it is then published on the homepage of the Federal Ministry of the Interior, Building and Community.¹ The present report is for the calendar year 2018. The cut-off date for data recording is 31 December 2018.

Selected results from the data collected are summarized below:

- This report covers 504,671 staff² in 953 agencies of the federal administration.³
- Investigations into 32 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 2018. This means that 0.0063% of federal administration staff were newly suspected of corruption.
- In the reporting year 2018, a total of 14 proceedings on suspicion of corruption from previous years, involving 12 criminal investigations, 2 internal investigations, 3 disciplinary proceedings and 1 instance of proceedings under labour law, were concluded. Sanctions were imposed on 25% of the total number of federal employees suspected.
- 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 74.62% of the agencies within the remits of all federal ministries.
- During the reporting year, 11,384 staff (31.54%) in the supreme federal authorities worked in areas of activity especially vulnerable to corruption. In the other agencies, the figure was a total of 47,685 staff (10.18%). The share of staff assigned to areas of activity especially vulnerable to corruption for more than five years was 23.80% on average.
- All the supreme federal authorities have appointed their own contact persons for corruption prevention. Nearly all agencies within the remits of the supreme federal authorities also have a contact person (95.59%). The role of contact person was held by a total of 912 people.

¹ The reports as of reporting year 2013 are available in German at: <https://www.bmi.bund.de/DE/themen/moderne-verwaltung/integritaet-der-verwaltung/korruptionspraevention/korruptionspraevention-node.html>; The reports as of reporting year 2014 are available in English at: <https://www.bmi.bund.de/EN/topics/administrative-reform/corruption-prevention/integrity-node.html>.

² See footnote 6.

³ See footnote 5.

- In 2018, 252,652 federal administration employees (50.06%) received initial or follow-up corruption-awareness training. Awareness-raising measures for staff in areas of activity especially vulnerable to corruption are repeated regularly in 917 agencies (96.2%). In 899 agencies (94.3%), awareness-raising measures for all other staff are repeated regularly.
- 20,472 federal administration employees (4.06%) took part in advanced corruption-prevention courses which went beyond corruption-awareness training.

II. Corruption prevention in the international context

A range of international forums address corruption prevention. Some examples are the United Nations, G20 (ACWG – Anti-Corruption Working Group), the OECD and the Council of Europe (GRECO – Group of States against Corruption). The Federal Ministry of the Interior, Building and Community represents the Federal Government on matters of corruption prevention in these committees.

The federal administration's approach to corruption prevention, along with the expertise of Germany's specialists in the field, is internationally renowned. For example, the High Level Principles on Organizing Against Corruption were drawn up during Germany's G20 presidency and adopted at the G20 summit in Hamburg. These principles are largely based on the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration of 30 July 2004 (the Directive). Individual countries have already reported that they are basing administrative reform on these principles.

The concept of having a contact person⁴ has been explicitly welcomed at international level. It is now classed by the OECD as best practice and is recommended within the organization's integrity checks and reports. The fact that the role of the contact person is purely preventive, rather than forming part of an investigating unit as it does in many other countries, is seen as particularly positive. The cooperation among ministries through the network of contact persons and, in turn, their coordination with the agencies in the relevant ministry's remit, is also seen as best practice. The Council of Europe's Group of States against Corruption regularly recommends the appointment of "persons of trust", most recently in its fifth evaluation round for top executive functions and law enforcement agencies.

The United Nations Convention Against Corruption (UNCAC) provides mechanisms to review its implementation regularly. These mechanisms involve several review cycles for the individual areas of the convention, beginning with criminalization and law enforcement and international cooperation, followed by corruption prevention and technical assistance for asset recovery. In 2018, Germany was assessed on the areas of corruption prevention and technical assistance in asset recovery. The assessment is not yet complete.

⁴ See point V. 5 for more details.

III. Key data: Agencies and staff included in the report

This section explains which and how many agencies,⁵ together with the number of staff at these agencies, are included in or excluded from this report.

1. General note

No. 1.1. of the Directive applies to the supreme federal authorities, the 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, special federal funds, and the armed forces. The Directive also applies correspondingly to legal entities under civil law which are wholly owned by the Federal Republic of Germany.

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

Because of its large number of agencies and staff, information for the Ministry of Defence is reported separately in certain places. As in previous years, information on the customs authorities (remit of the Federal Ministry of Finance) is given separately in some cases due to their organizational structure.

2. Scope of the report

a) General overview

This report covers 504,671 staff⁶ in 953 agencies. Of these, 250 agencies are outside of the defence remit, with a total of 282,377 staff. Within the remit of the Federal Ministry of Defence, data were compiled on 703 agencies with a total of 222,294 staff.

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

Outside of the remit of the Federal Ministry of Defence

Level	Number of agencies	Number of staff
Supreme federal authorities (including the Federal Constitutional Court)	22	33,669
Higher federal authorities	60	78,283
Mid-level federal authorities	1	839
Lower-level federal authorities	109	79,534

⁵ For linguistic simplicity, this report will refer to authorities, courts, agencies and other bodies, as well as legal entities under civil law, as "agencies" when referring to them collectively.

⁶ The number of staff is based on the information provided by the agencies in response to the survey distributed in preparation for this report. 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.

Level	Number of agencies	Number of staff
Federal courts (excluding the Federal Constitutional Court)	6	1,240
Legal entities under civil law	16	31,823
Other bodies (e.g. foundations and offices)	36	56,989
TOTAL	250	282,377

Within the remit of the Federal Ministry of Defence

Level	Number of agencies	Number of staff
Supreme federal authority	1	2,428
Higher federal authorities	21	22,700
Mid-level federal authorities	81	33,291
Lower-level federal authorities	593	158,467
Federal courts (Bundeswehr Disciplinary and Complaints Court)	2	42
Legal entities under civil law	5	5,366
TOTAL	703	222,294

The individual ministries have checked to ensure that all agencies within their remit have been included, also using the Federal Government's 2018 report⁷ on participation.

b) Individual agencies

aa) Within the remit of the Federal Foreign Office

The Center for International Peace Operations (ZIF) gGmbH applies the Directive with the necessary modifications. A contact person was appointed in early 2019. The 2019 report will provide information on the application of the Directive by the ZIF gGmbH.

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

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 agricultural, forestry and horticultural workers are excluded from the Directive based on their right to self-administration. However, they apply the Directive on a voluntary basis and are therefore included in the remit of the Federal Ministry of Labour and Social Affairs.

⁷ Available at: https://www.bundesfinanzministerium.de/Web/DE/Themen/Bundesvermoegen/Privatisierungs_und_Beteiligungspolitik/Beteiligungspolitik/Beteiligungsberichte/beteiligungsberichte.html.

c) Within the remit of the Federal Ministry of Finance

As in the previous year, 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.

The Foundation Remembrance, Responsibility and Future (EVZ) was founded in August 2000 as an independent foundation with legal capacity under public law and is subject to the legal supervision of the Federal Ministry of Finance.

In remembrance of the victims of National Socialist injustice, the EVZ Foundation works to promote human rights and understanding between peoples. The Foundation is thus an expression of the continuing political and moral responsibility of the state, the private sector and society as a whole for Nazi injustice and towards the victims.

The Foundation applies the Directive. It has appointed a contact person and deputy and applies preventive measures such as the principle of greater scrutiny. The Foundation will be included in the survey in future.

dd) Within the remit of the Federal Ministry of Defence

There was structural reorganization in the mid- and lower-level authorities at the Federal Ministry of Defence during the reporting year, leading to a change in the number of mid- and lower-level authorities in comparison with 2017. The growth in staff numbers in comparison with 2017 is due to the addition of tasks within the Ministry's remit, and the associated staffing increase.

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

As in the previous year's report, Deutsche Bahn AG is not included. This is 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.

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

The companies in which the Federal Government holds a 100% stake within the remit of the Federal Ministry for Economic Affairs and Energy apply the Directive with the necessary modifications. Because they are organized like private companies, they were not included in the electronic survey; the following summary of the corruption prevention measures in place is provided instead:

Germany Trade and Invest (External Economic Promotion and Inward Investment) (GTAI) applies the Recommendations on Preventing Corruption in the Federal Administration⁸ and the Private Sector/Federal Administration Anti-Corruption Initiative document *Answers to frequently asked questions about accepting gifts, hospitality or other benefits*.⁹ The contact person is responsible for coordinating the measures, and this task is monitored by internal auditing. Last year, an obligatory online training course and a set of guidelines on accepting gifts were drawn up for all staff.

The management board of the Wissenschaftliches Institut für Infrastruktur und Kommunikation GmbH (WIK GmbH, the German research institute for infrastructure and communication) has issued service instructions and a signature regulation to ensure compliance with the principle of greater scrutiny and observation of the principle of separation of functions. The collective bargaining agreement forbids staff from accepting gifts or hospitality. Attempted bribery must be reported to the management board immediately. Staff members are also reminded regularly in institute meetings to comply with provisions.

The management board and the supervisory board of Wismut GmbH publish an annual statement confirming that the company has complied with and will continue to comply with the Federal Government's corporate governance code. The company also publishes an annual corporate governance report on its website. As part of the implementation of the Directive, in 2017 the areas of activity especially vulnerable to corruption were identified and/or analysed, staff rotation possibilities were explored and checks were made of whether instructions were given and training provided in the field of corruption prevention. System and compliance checks always include checks for shortcomings that would allow for corruption. Provisions for resolving these shortcomings are set out where necessary. Transparency of processes and compliance with the principles of proper accounting such as greater scrutiny are the priorities for these provisions. No specific cases of corruption have been identified to date.

gg) Within the remit of the Federal Ministry for Economic Cooperation and Development (BMZ)

Engagement Global gGmbH applies the Directive with the necessary modifications. A contact person was appointed effective 1 February 2018. The 2019 report will provide information on the application of the Directive by Engagement Global gGmbH.

⁸ See footnote 13.

⁹ Available at: https://www.bmi.bund.de/SharedDocs/downloads/DE/publikationen/themen/moderne-verwaltung/korruptionspraevention/faqs-korruptionspraevention.pdf;jsessionid=B3849258BB1EB09CBFC6552E4ECEBB25.2_cid295?_blob=publicationFile&v=4.

hh) 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

The following section covers the cases of suspected corruption reported for the first time (see unterhalb, below) and concluded from previous years (see 3, below) in the reporting year. To better understand this section, the relevant terms used in the Directive will be specified and a brief overview of the procedure in cases of suspected corruption will be given (see 1, below).

1. *Definitions and procedures*

In cases of suspected corruption, the Directive obliges the head of the agency (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 head of the agency is expected to notify the public prosecutor's office and the highest service authority and take measures to prevent concealment.

The term "case of suspected corruption" is defined more specifically in the handbook on the working practices of contact persons for corruption prevention of 20 September 2013¹⁰ (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, agency management 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 unit and/or the facility protection unit of the police may also take action (for detailed information on the tasks 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 a criminal investigation. A criminal investigation ends either with termination of the investigation, a penal order or a bill of indictment sent to the responsible court. Termination of the investigation may be considered if it was not possible to gather sufficient evidence (Section 170 (2) of the Code of Criminal Procedure), if the

¹⁰ 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>.

perpetrator'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 terminated while imposing conditions and instructions upon the accused (Section 153a of the Code of Criminal Procedure). A penal order in accordance with 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 usually based on the outcome of the criminal proceedings. Civil servants are dismissed from service on sentencing by a German criminal court to imprisonment of at least one year on charges of a deliberate crime (see Section 41 (1), first sentence, 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), first sentence, no. 2 of the Act on Federal Civil Servants) as soon as the judgment is no longer subject to appeal. In such cases, disciplinary proceedings are terminated (Section 32 (2) no. 2 of the Federal Disciplinary Act).

Even if the criminal proceedings are terminated 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), and
- 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 disciplinary proceedings under labour law in parallel to informing the public prosecutor's office, but suspends these 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, or
- exceptional dismissal (in accordance with Section 626 of the Civil Code).

A case of suspected corruption is closed 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 new cases

Proceedings involving federal employees

In the 2018 reporting year, in the federal administration included in the report, a total of 22 criminal investigations concerning 36 federal employees (civil servants, non-civil servant employees, military personnel, and other public service staff including local staff members) were opened in connection with corruption offences in the narrower sense or with typical related offences such as fraud or breach of trust.¹¹ Criminal investigations were terminated during the reporting year in five of these cases due to a lack of evidence. In the 2018 reporting year, there were 17 cases with grounds for suspicion of corruption-related offences, involving 31 federal employees, or 0.0061%¹² of federal administration staff.

In addition to the aforementioned criminal investigations, disciplinary proceedings were launched against five federal employees. Labour law proceedings were launched against a total of 26 members of local staff.

Criminal investigations concerning third parties

Furthermore, in the 2018 reporting year a total of 22 third parties were the subject of 12 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 benefits and were reported to the police directly by those approached. In two cases, criminal investigations were terminated during the reporting year due to lack of evidence.

¹¹ Compared to 19 criminal investigations in 2017, 33 in 2016, 28 in 2015, 19 in 2014 and 2013, 12 in 2012, 34 in 2011 and 31 in 2010.

¹² The percentage is based exclusively on criminal proceedings 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. 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.

a) Federal Foreign Office

The Federal Foreign Office reported a total of 16 new cases of suspected corruption involving a total of 3 federal employees and 26 members of local staff. In all cases, either internal investigations were carried out or investigations were begun by the public prosecutor. In four cases, investigations were terminated during the reporting year due to a lack of evidence. These cases involved one civil servant, one non-civil servant employee and two members of local staff. The remaining ongoing cases concerned the issuing of visas in German visa offices abroad. In all of these 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. Labour law proceedings were launched against a total of 26 members of local staff.

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. During an audit, an employee in the audit service of the German Federal Pension Insurance suggested to an employer that they would reduce the amount owed for failure to pay pension contributions in exchange for payment. A criminal investigation and disciplinary proceedings were launched.

c) Federal Ministry of Finance

The Federal Ministry of Finance reported three new cases of suspected corruption in the customs administration. The public prosecutor's office terminated two investigations into cases of suspected acceptance and/or giving of benefits during the reporting year due to lack of evidence. In the third case, the public prosecutor's office began an investigation of a civil servant on suspicion of accepting bribes and benefits in exchange for revealing official secrets. Disciplinary proceedings were also launched.

d) Federal Ministry of the Interior, Building and Community

The Federal Ministry of the Interior reported seven new cases of suspected corruption, six of which were in agencies within its remit. Two cases were closed during the reporting year: One case was terminated due to a lack of sufficient evidence, and the second case was concluded with a penal order against a third party.

- In one case, a civil servant employee at the Federal Ministry of the Interior was suspected of awarding service contracts directly although these exceeded the threshold value, and of the transfer without compensation of usage and property rights of the Federation. The public prosecutor's office terminated proceedings during the reporting year due to a lack of evidence. The disciplinary proceedings against the civil servant were ongoing during the reporting year.

- One case of suspected corruption involved the Federal Office for Migration and Refugees (BAMF). The anti-corruption ombudsperson received an anonymous tip which claimed that six staff of a local office had accepted gifts and cash from interpreters, among other things. There was also suspicion of false invoicing of interpreting assignments. One member of staff was suspected of making a binding promise of a 14-month interpreting assignment to an interpreter, against service instructions. Criminal proceedings were initiated against six staff in the local office and ten third parties.
- There was another case of suspected corruption against a BAMF arrival centre. According to information from an interpreter, it was claimed that a civil servant and an interpreter had offered asylum applicants targeted preparation for their hearings by the BAMF in exchange for money. The public prosecutor's office terminated proceedings during the reporting year due to a lack of evidence.
- In one BAMF arrival centre, an asylum applicant offered the sum of €1,000 to be allowed to remain in Germany when his file was being opened. Criminal proceedings were initiated against him.
- A Federal Police officer who was involved in the procurement of command, control and operational equipment as part of his job, also worked in a secondary activity for a company that potentially came into question as a contracting party. He had provided incomplete/false information when applying for authorization for this secondary activity. The public prosecutor's office is investigating him in relation to a contract award. Disciplinary proceedings were initiated.
- In another case at the Federal Police, a person suspected of breaking Germany's criminal insult law at a festival was identified. The suspect initially offered the police officer €100 and subsequently €150 not to submit a report of the incident. The charge was immediately extended to include attempted bribery and the suspect was informed orally of the charge. In response to this, the suspect offered the police officer €50,000 not to initiate criminal proceedings. The police officer refused this offer. The public prosecutor's office initiated criminal proceedings.
- In the last case, a driver for the Federal Police was considered to be behaving erratically and subsequently underwent a police check. The check provided clear indications that the driver had consumed alcoholic beverages, which was subsequently confirmed by a breath alcohol test. The vehicle driver then tried to persuade the police officer carrying out the check to refrain from taking the matter further by offering a total of €25. A further examination of the vehicle resulted in the discovery of small amounts of a narcotic substance. Throughout this time, the vehicle driver continually directed insults against individual police officers and

against the police force as a group. The vehicle driver received a non-appealable penalty of 110 day fines for attempted bribery and insult.

e) Federal Ministry of Defence

The Federal Ministry of Defence reported five new cases of suspected corruption within its remit in the reporting year.

- A technical cost accountant at a naval agency was suspected of accepting bribes in connection with a repair project. The accused civil servant, who admitted to his superiors that he had accepted bribes, was alleged to have taken inexpensive loans from persons in authority within a Bundeswehr contractor and an associated company. Criminal proceedings were initiated against the civil servant and two third parties. Disciplinary proceedings were also initiated against the civil servant.
- In another case, a company became aware during an internal compliance investigation that an “expert opinion” with a value of approximately €55,000 had been commissioned in its name and paid for, but that the expert opinion as described clearly did not exist. A senior officer in the Bundeswehr had been assigned with compiling this “expert opinion”, which at the time may have had a decisive influence on the award of an equipment order to the company. The order was processed by another company, of which the CEO is the suspect’s wife. The public prosecutor's office has initiated proceedings on suspicion of taking bribes and of fraud.
- In a further case, based on information from a tax office the police are investigating five members of the navy on suspicion of accepting benefits. Civilian members of the navy are alleged to have accepted gifts from a company with an approximate value of between €30 and €37.
- In the next case, based on information from a tax office the police are investigating five members of the Federal Office of Bundeswehr Equipment, Information Technology and In-Service Support on suspicion of accepting benefits. Civilian members of the Federal Office of Bundeswehr Equipment, Information Technology and In-Service Support are alleged to have accepted gifts from a company.
- In the last case, a soldier is suspected of having received money in the amount of at least €12,500 through his wife’s company from a manufacturer of dental products. In exchange, the manufacturer was awarded contracts from a Bundeswehr hospital that could be traced back to the soldier. Criminal proceedings were initiated.

f) Federal Ministry for Economic Affairs and Energy

The Federal Ministry for Economic Affairs and Energy reported one new case of suspected corruption. A person who had responded to a job advertisement submitted employment

references on request. The letter to the HR division enclosed with the references included a €50 note. The incident was reported. The public prosecutor's office terminated proceedings due to a lack of evidence.

3. Overview of cases closed

During the 2018 reporting year, a total of 14 cases of suspected corruption from the previous years were closed. Specifically, during the reporting year, 12 criminal investigations, 2 internal investigations, 3 disciplinary proceedings and 1 instance of proceedings under labour law were concluded.

In six cases, the criminal proceedings ended with sentencing. One of the cases closed ended with the sentencing of one person, one instance of terminated proceedings against a different person due to insufficient evidence, and one instance of terminated proceedings against a third person due to the petty nature of the suspected offence. In four cases, the criminal proceedings were terminated due to insufficient evidence and in one case, proceedings were terminated against payment of a fine. In two cases, internal investigations did not confirm suspicions.

Two disciplinary proceedings were terminated and one instance of disciplinary proceedings concluded with a double demotion. One instance of proceedings under labour law led to a termination of the working relationship.

Sanctions were imposed on 25% of the total number of federal employees suspected.

a) Federal Foreign Office

During the reporting year, three proceedings from previous years within the remit of the Federal Foreign Office were concluded. All three cases occurred at visa offices abroad. In all three cases, no evidence was found to support the initial suspicion of corruption by one local staff member in each case; the investigations were terminated.

b) Federal Ministry of Labour and Social Affairs

One case of suspected corruption from the previous year within the remit of the Federal Ministry of Labour and Social Affairs was closed. A member of staff of the German Federal Pension Insurance was accused of selling information to an external firm of private investigators. Criminal proceedings were terminated due to a lack of evidence. The employment relationship has since been ended.

c) Federal Ministry of Finance

Within the remit of the Federal Ministry of Finance, seven proceedings from previous years against a total of two federal employees and five third parties were concluded during the reporting year.

- Within the Institute for Federal Real Estate there were two proceedings, against one third party in each case. Both proceedings concerned allegations of granting advantages. In the first case, after the completion of a real estate transaction with the Institute for Federal Real Estate, the buyer – after meeting with the official responsible for the transaction – left an unsolicited gift in the meeting room (perfume and €1,000 cash). A penalty order of 90 day fines was handed down. In the second case, a potential buyer asked a member of staff of the Institute for Federal Real Estate during a viewing 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. Proceedings were terminated against payment of a fine of €2,700 in accordance with Section 153a of the Code of Criminal Procedure.
- A customs officer at the main customs office accepted the declarations for export for a company on behalf of a colleague, although he did not have local responsibility for this. The officer was sentenced to imprisonment for ten months for numerous cases of illegal assumption of public authority. The enforcement of the custodial sentence was suspended on probation. The disciplinary penalty included a double demotion.
- During customs processing, a customs officer took €25 in two cases for return costs, without authorization to accept payment and without issuing proof of payment. He received a non-appealable penalty of 40 day fines for theft and fraud. The disciplinary proceedings were terminated.
- In one case, a third party was checked by two officers at the main customs office for money he was carrying. As he was carrying cash with a value of more than €10,000 and had not fulfilled the duty to declare the money, the officers initiated administrative fine proceedings. In response, the transit passenger mimed tearing up the paperwork issued to initiate the administrative fine proceedings and laid €500 on the counter for the officers. He received a non-appealable penalty of 60 day fines for bribery.
- In another case, an inbound passenger was checked by two officers from the main customs office for goods to be declared on arriving in Germany. During the course of the check, the officers ascertained that he 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. The suspect offered to sell the notebook to the officers for half of its sale price if they refrained from initiating criminal proceedings and the subsequent customs measures. He received a non-appealable fine of 60 day fines for bribery.
- A third party tried to persuade an inspecting officer and a clearance officer from the main customs office, both of whom he knew from training, to exempt certain individuals from checks when departing from a free port. These individuals planned

to smuggle cigarettes and car components. The customs officers were offered €3,000 to €4,000 cash in return for letting them pass through. The third party was sentenced to imprisonment for six months for bribery. The enforcement of the custodial sentence was suspended on probation.

d) Federal Ministry of the Interior, Building and Community

During the reporting year, two proceedings from previous years within the remit of the Federal Ministry of the Interior, Building and Community were concluded.

- One case affected the Federal Police. A Chinese national in transit to onward travel bypassed immigration control in error. In order to reach his onward flight, he passed through border control (exit) once again. He allegedly gave the control officer 200 dollars but did not receive a receipt. He then reported this incident to another officer. The public prosecutor's office initiated investigations of the passenger for bribery and of two members of the Federal Police for accepting bribes. One of the officers was sentenced to a prison term of one year for accepting bribes and blackmail. The enforcement of the custodial sentence was suspended to three years on probation. The officer was dismissed from service and the disciplinary proceedings were terminated. The criminal proceedings against the second officer were terminated due to a lack of evidence. The criminal proceeding against the passenger were terminated due to the petty nature of the offence in accordance with Section 153 (1) of the Code of Criminal Procedure.
- In one case, a staff member of a local section of the Federal Agency for Technical Relief was suspected of providing technical support to a volunteer that had not been correctly billed. An internal investigation to clarify the matter did not confirm the suspicion.

e) Federal Ministry of Defence

One case of suspected corruption within the remit of the Federal Ministry of Defence was closed. In the Bundeswehr hospital, a soldier was suspected of having received benefits from a supplier in exchange for using specific medical products. Investigations carried out internally did not confirm the suspicion.

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 and analysing areas of activity which are especially vulnerable to corruption.

Number 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 for Prevention of Corruption in the Federal Administration¹³ (Recommendations) intended to help interpret and explain the Anti-Corruption Directive provide a more detailed definition of the term “areas of activity especially vulnerable to corruption” and of the procedure for identifying and analysing them. The handbook of 4 January 2012 on identifying areas of activity especially vulnerable to corruption offers extensive assistance with conducting this procedure.¹⁴

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 the agencies within the remits of the federal ministries in bb). An overview is also available in Table a in Annex 2 (supreme federal authorities) and in Table a in Annex 3 (agencies within the remits of the federal ministries).

aa) Supreme federal authorities

All areas of activity especially vulnerable to corruption were identified and recorded in all 23 of the supreme federal authorities at least once. During the reporting year, 11,384 employees in the supreme federal authorities (including the Federal Ministry of Defence) worked in areas of activity especially vulnerable to corruption.

Of the 23 supreme federal authorities, 19 conducted a full review or full update in 2014 or later (i.e., less than five years prior to the 2018 reporting period).

¹³ Available at: <https://www.bmi.bund.de/SharedDocs/downloads/DE/publikationen/themen/moderne-verwaltung/korruptionspraevention/korruptionspraevention-empfehlungen.pdf?blob=publicationFile&v=2>.

¹⁴ Available at: <https://www.bmi.bund.de/SharedDocs/downloads/DE/publikationen/themen/moderne-verwaltung/korruptionspraevention/korruptionspraevention-handreichung-korruptionsgefaehrdete-arbeitsgebiete.pdf?blob=publicationFile&v=2>.

bb) Agencies within the remits of the federal ministries

There are a total of 930 agencies within the remits of the federal ministries (of which 702 are within the remit of the Federal Ministry of Defence) and 468,574 staff (of which 219,866 are within the remit of the Federal Ministry of Defence). Reliable figures on areas of activity especially vulnerable to corruption are available for 214 agencies (excluding those within the remit of the Federal Ministry of Defence¹⁵) with a total of 214,313 staff, and for 480 agencies within the remit of the Federal Ministry of Defence.

Based on these figures, 47,685 staff in agencies within the remits of the federal ministries (of which 5,506 were within the remit of the Federal Ministry of Defence) worked in areas of activity especially vulnerable to corruption.

By the data collection cut-off date, existing data on 75,075 staff (30.19%) in the agencies in the remits of the federal ministries other than the Federal Ministry of Defence were based on full reviews; on 117,736 staff (47.34%) on updates; on 7,673 staff (3.09%) on partial reviews and on 13,829 staff (5.56%) partly on full reviews and partly on updates.

Current data on areas of activity especially vulnerable to corruption based on complete reviews or updates in 2018 were available for 671 agencies of the federal ministries (of which 479 were within the remit of the Federal Ministry of Defence). Only in 54 agencies (of which 32 were within the remit of the Federal Ministry of Defence) was the latest full review or update of areas of activity especially vulnerable to corruption conducted in 2013 or earlier (i.e. more than five years prior to the 2018 reporting period).

b) Risk analysis

A risk analysis was considered necessary for 92.51% of areas of activity especially vulnerable to corruption in the supreme federal authorities (10,531 areas of activity). This was carried out for 96.03% of them (10,113 areas of activity).

In the agencies within the remits of the federal ministries, a risk analysis was considered necessary for 56.89% of areas of activity especially vulnerable to corruption (27,126 areas of activity). This was carried out for 87.98% of them (23,866 areas of activity).

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. 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.

¹⁵ The pooling of data means that it is not possible to provide information on the number of staff in agencies within the remit of the Federal Ministry of the Defence for whom reliable figures on areas of activity especially vulnerable to corruption are available.

2. *Rotation requirement 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 in exceptional cases 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 (e.g. expanding the principle of greater scrutiny, introducing teamwork or particularly strict administrative and task-related supervision).

The long-standing practice of not applying the principle of job rotation in some 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 growing complexity of tasks and the scarcity of expert professionals due to demographic change further aggravate 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.

a) Cases of suspected corruption and areas of activity especially vulnerable to corruption

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 cases of suspected corruption (see IV). The result of this data collection was as follows:

- **New cases of suspected corruption.** A total of 32 federal employees were still subject to ongoing investigations when the reporting year ended. Of the staff concerned, 16 were involved in areas of activity especially vulnerable to corruption. Four of them had been working in this area of activity for more than five years.
- **Cases of suspected corruption from previous years.** During the 2018 reporting year, a total of 14 cases of suspected corruption from the previous years were concluded. These involved a total of ten public service staff. Investigations did not confirm the suspicions for six staff, so the proceedings that had been initiated were terminated. In three cases, the investigations led to a criminal conviction. In one case, the employment relationship was terminated. None of the staff convicted worked in areas of activity especially vulnerable to corruption.

b) Supreme federal authorities

Information on staff rotation is obtained from the length of time that staff spend in areas of activity especially vulnerable to corruption. In the supreme federal authorities, a total of 2,654 staff had spent more than five years in an area of activity especially vulnerable to corruption. This represents an average share of 23.31%.¹⁶ The share of staff assigned to areas especially vulnerable to corruption for more than five years was

- more than 50% in three supreme federal authorities,
- between 30% and 46% in six supreme federal authorities, and
- less than 30% in seven supreme federal authorities.

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 with the reasoning that the staff in question were specialists who could not be rotated or other staff with specific expertise that would be very difficult to replace.

For 89.75% of staff working in areas of activity especially vulnerable to corruption for longer than five years, compensatory measures were taken in the supreme federal authorities.

c) Agencies within the remits of the federal ministries

In some agencies within the remits of the federal ministries, the length of time spent by staff in areas of activity especially vulnerable to corruption is not yet recorded across the board. Figures are available for 192 agencies within the remits of the federal ministries with a total of 177,320 staff, and for 127 agencies within the remit of the Federal Ministry of Defence.¹⁷

In the agencies within the remits of the federal ministries, a total of 11,406 staff had spent more than five years in an area of activity especially vulnerable to corruption. This represents 23.92% of staff working in areas of activity especially vulnerable to corruption in the agencies within the remits of the federal ministries. Compensatory measures were taken for 7,923 of these staff to offset the risk of failure to rotate staff.

The agencies within the remits of the federal ministries explained their failure to rotate staff after a maximum of five years with the reasoning that the staff in question were specialists who could not be rotated or other staff with specific expertise that would be very difficult to replace.

¹⁶ There was insufficient data available at six supreme federal authorities to enable conclusions to be drawn regarding length of time in positions and the reason for the lack of rotation.

¹⁷ The pooling of data means that it is not possible to provide information on the number of staff in these agencies affected.

3. *Administrative and task-related supervision*

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

Number 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.

9.2 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 agencies within their remits, as a key element for managing and monitoring the federal administration.

Thirteen supreme federal authorities (including the Federal Ministry of Defence) and 425 agencies within the remits of the federal ministries (of which 244 are within the remit of the Federal Ministry of Defence) have specific regulations on monitoring staff as to how they perform their duties (administrative supervision).

Fourteen supreme federal authorities and 424 agencies within the remits of the federal ministries (of which 240 are within the remit of the Federal Ministry of Defence) have specific regulations on monitoring lawfulness and expedience (task-related supervision).

Sixteen supreme federal authorities and 314 agencies within the remits of the federal ministries (of which 135 are 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 agencies within their remits 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 agencies within the remits of the federal ministries (including the remit of the Federal Ministry of Defence) which exercise administrative or task-related supervision of other agencies. 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 Directive, to reduce the risk of errors and misuse, important decisions are not to be made by individual staff members on their own.

Number 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 is fulfilled by having additional staff check and monitor work results (plausibility check). The principle of greater scrutiny is ensured in particular by rules on co-signature requiring a second staff member to check work results (compare the individual recommendations¹⁸ on number 3 of the Directive).

Twenty-one supreme federal authorities (including the Federal Ministry of Defence) and 499 agencies within the remits of the federal ministries (of which 389 are within the remit of the Federal Ministry of Defence) require a second staff member to check work results.

All 23 supreme federal authorities and 611 agencies within the remits of the federal ministries (of which 494 are 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 627 agencies within the remits of the federal ministries (of which 526 are within the remit of the Federal Ministry of Defence).

Additional details, especially 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 (agencies within the remits of the federal ministries).

¹⁸ See footnote 13.

5. Contact person for corruption prevention

Number 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, and for 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;

helping keep the public informed about penalties under public service law and criminal law (preventive effect) while respecting the privacy rights of those concerned. [...]

All of the supreme federal authorities had their own contact person during the reporting year. All agencies within the remits of the federal ministries (excluding the Federal Ministry of Defence) had a contact person. The role of contact person was held by a total of 912 people.

For 346 agencies within the remits of the federal ministries (of which 293 are within the remit of the Federal Ministry of Defence) the contact person is shared with another agency. These are (excluding the Federal Ministry of Defence)

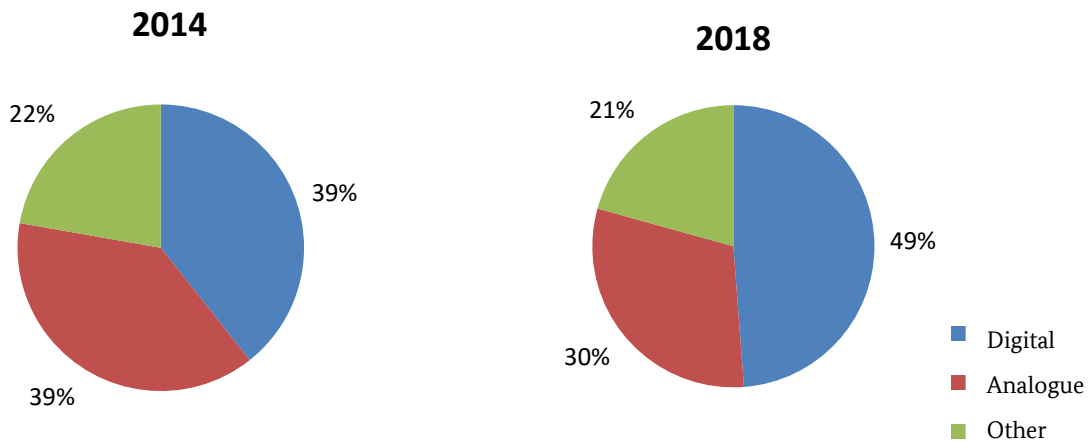
- the Federal Institute for Population Research (50 staff),
- the Central Command for Maritime Emergencies (27 staff),
- the Federal Agency for Financial Market Stabilisation (11 staff),
- the Federal Agency for Administrative Services (281 staff),
- the Federal Department for Media Harmful to Young Persons (26 staff),
- Fluko Flughafenkoordination Deutschland GmbH (12 staff)
- 46 local offices for waterways and shipping and offices for new construction (11,173 staff), and
- Zukunft - Umwelt - Gesellschaft (ZUG) gGmbH (79 staff).

The type and frequency of information provided by contact persons in the agencies within the remits of the federal ministries is shown in the following graphic. The graphic distinguishes between information provided in analogue (leaflets, brochures and information events), digital (information on the intranet and on the Internet), and other forms (the total number of reporting agencies is shown. Multiple answers were possible).

To illustrate the historical development of information provision, the data set from reporting year 2014 is provided for comparison purposes. It is clear from the graphic that the provision of digital information is also increasing in the field of corruption prevention.

In the reporting year, 593 contact persons for corruption prevention (65%, including 462

Provision of information



from the Federal Ministry of Defence and its remit) met with representatives of agency management to discuss issues related to corruption prevention. This means that the number of contact persons who met with representatives of agency management to discuss corruption prevention increased slightly compared to the previous years (2017: 550 contact persons who met with agency management, 2016: 522 contact persons who met with agency management). Annex 2, Table f (supreme federal authorities) and Annex 3, Table g (agencies within the remits of the federal ministries) show the reasons for contacts and their frequency.

In the entire federal administration (as far as it was possible to collect specific figures), 350.99 full-time equivalents (of which 137.77 were within the remit of the Federal Ministry of Defence) were assigned corruption prevention tasks. Performing the tasks of contact person for corruption prevention accounted for approximately 174.98 full-time equivalents (of which 96.19 were within the remit of the Federal Ministry of Defence), carried out by 912 people (of whom 456 were within the remit of the Federal Ministry of Defence). Other corruption prevention tasks were performed by 1,003 persons (of whom 247 were within the remit of the Federal Ministry of Defence), accounting for 176.01 full-time equivalents (of which 41.58 were within the remit of the Federal Ministry of Defence).

6. Staff awareness

Number 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, a total of 252,652 staff (50.06%), including 16,187 supervisory staff, participated in corruption-awareness measures during the reporting year.

Awareness-raising measures for staff in areas of activity especially vulnerable to corruption are repeated regularly in 917 agencies (96.2%). In 899 agencies (94.3%), awareness-raising measures for all other staff are repeated regularly.

Awareness-raising measures for staff in areas of activity especially vulnerable to corruption are repeated annually in 297 agencies (of which 166 are within the remit of the Federal Ministry of Defence). Awareness-raising measures for staff in all other areas are repeated annually in 638 agencies (of which 558 are within the remit of the Federal Ministry of Defence). This means that awareness-raising measures for all staff are carried out annually in around 80% of all agencies of the Federal Ministry of Defence. For the other remits of the federal ministries and for the supreme federal authorities, the figure is 53% of agencies.

A total of 731 supervisory staff members were involved in providing awareness-raising measures as trainers, instructors or advisers.

7. Basic and advanced training

Number 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 of activity especially vulnerable to corruption, and staff in the organizational units referred to in Number 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 events 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.

As the central federal training facility, the Federal Academy of Public Administration always offers courses on preventing and fighting corruption for contact persons and on

corruption prevention and awareness for public service staff, as well as e-learning modules on corruption prevention. The courses deal with the forms corruption can take; recognizing behaviour that can corrupt; the tasks of the contact person; 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 training centre of the Federal Waterways and Shipping Administration and the training and knowledge centre of the Federal Revenue Administration offer largely identical training seminars, while the Bundeswehr's training centre focuses on 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 for the ministry and its remit, with three modules for different target groups.

Overall, 20,427 staff took part in basic and advanced training courses of this type (of which 4,357 were within the remit of the Federal Ministry of Defence); 5,292 of them were staff in areas of activity especially vulnerable to corruption.

In 229 agencies (of which 57 were within the remit of the Federal Ministry of Defence), executive staff also received corruption prevention training (in general, not necessarily during the reporting year). In 2018, 2,953 supervisory staff (of which 549 were within the remit of the Federal Ministry of Defence) were trained in preventing corruption, and 121 supervisory staff (of which 30 were within the remit of the Federal Ministry of Defence) were involved in training measures as trainers, instructors or advisers.

VI. Good Practices

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. Threat and risk analyses for areas of activity especially vulnerable to corruption were started, continued or completed in a number of agencies. Numerous awareness-raising and training measures were designed and carried out, especially for supervisory and other staff in areas of activity especially vulnerable to corruption. Several agencies developed a corruption prevention training concept and carried out activities for International Anti-Corruption Day. A number of individual examples of good practice are listed below as a sample of the wide range of corruption prevention measures that were carried out:

- At the **Federal Foreign Office**, a demonstration presentation to raise staff awareness was drawn up in the languages of the UN for diplomatic representations abroad.
- The **Kulturveranstaltungen des Bundes in Berlin GmbH**, which is within the remit of the Federal Government Commissioner for Culture and the Media, has appointed an ombudsperson for enquiries and reports.
- The **Federal Ministry of Labour and Social Affairs** fleshed out its internal concept for corruption prevention in regard to staff awareness and advanced training. The concept includes a provision that supervisory staff recruited externally must take part in a personal awareness-raising discussion with the contact person.
- To mark International Anti-Corruption Day 2018, the **Federal Ministry of Education and Research** carried out a web-based awareness-raising session. In future, this will be repeated annually. In addition, all new members of staff must now take part in an awareness-raising discussion with the contact person.
- The **Federal Office of Consumer Protection and Food Safety**, which is within the remit of the Federal Ministry of Food and Agriculture, has anchored in its quality management system an annual meeting on corruption prevention with agency management and other supervisory staff.
- To encourage discussion among staff, the **Federal Central Tax Office**, which is within the remit of the Federal Ministry of Finance, developed example cases and published these on the intranet in a series called “What would you do?” Workshops on corruption prevention were carried out for directors-general and heads of division. In addition, new service instructions were drawn up on dealing with gifts and rewards. This included FAQs with specific examples of possible gifts, and procedural rules. Multipliers serve at all locations as direct contact persons for staff and to provide extra personnel to support the contact person for corruption

prevention. The Federal Central Tax Office carried out a poster campaign involving staff to mark International Anti-Corruption Day 2018.

- The **Federal Ministry for Family Affairs, Senior Citizens , Women and Youth** plans to publish regular prevention newsletters in 2019. In that year it also plans to put together a modular concept for information, advice and training management on the topic of corruption prevention.
- The **Federal Agency for Civic Education**, which is within the remit of the Federal Ministry of the Interior, is drawing up a new corruption prevention strategy. As well as a training concept, it includes other organizational measures and a guide for reviewing areas of activity especially vulnerable to corruption. The strategy is to be implemented in the second half of 2019.
- To mark International Anti-Corruption Day 2018, the **Federal Ministry of Justice and Consumer Protection** also carried out a web-based awareness-raising session that will be repeated annually in future. The form for employee interviews is also to be extended to include questions on corruption prevention.
- The **Federal Office of Justice** created an Excel database to help deal with the workload resulting from carrying out threat assessments to ascertain areas of activity especially vulnerable to corruption as well as the risk analysis to be carried out subsequently if necessary. 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.
- The federal agency for nuclear waste disposal (**Bundesgesellschaft für Endlagerung mbH, BGE**), which is within the remit of the Federal Ministry of the Environment, Nature Conservation and Nuclear Safety, was being set up in 2018 and began drawing up concepts for implementing the Directive and for a compliance management system. As part of its reorganization, the BGE is also to establish a compliance and anti-corruption office.
- The **National Metrology Institute of Germany**, which is within the remit of the Federal Ministry for Economic Affairs and Energy, revised its information for staff on the ban on accepting rewards or gifts, especially how to deal with travel allowances from third parties.
- To coincide with International Anti-Corruption Day 2018, the **Federal Ministry for Economic Cooperation and Development** sent an e-mail circular to all staff to raise awareness of the topic of corruption. There was also an anti-corruption stand on the same day to provide information on the Directive. The executive agencies of the Federal Ministry for Economic Cooperation and Development used this to provide

information on their anti-corruption projects in the ministry's partner countries. Staff could test their new knowledge in a quiz.

- The **Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH** extended its compliance management system to its external branch offices. The main compliance and integrity risks are analysed at federal state level and are processed with the help of measures to minimize risks. Substantial risks that are identified, including the measures taken to counteract them, are included in the company-wide risk management process.

Annex of tables

Annex 1 – Agencies included in this report

Table a: Supreme federal authorities included in this report

Federal Foreign Office
 Federal Commissioner for Data Protection and Freedom of Information
 Federal Chancellery
 Federal Government Commissioner for Culture and the Media
 Federal Ministry of Labour and Social Affairs
 Federal Ministry of Education and Research
 Federal Ministry of Food and Agriculture
 Federal Ministry of Finance
 Federal Ministry for Family Affairs, Senior Citizens, Women and Youth
 Federal Ministry of Health
 Federal Ministry of the Interior, Building and Community
 Federal Ministry of Justice and Consumer Protection
 Federal Ministry for the Environment, Nature Conservation and Nuclear Safety
 Federal Ministry of Defence
 Federal Ministry of Transport and Digital Infrastructure
 Federal Ministry for Economic Affairs and Energy
 Federal Ministry for Economic Cooperation and Development
 Press and Information Office of the Federal Government
 Office of the Federal President
 Bundesrat
 Bundesrechnungshof (German SAI) (Administration)
 German Bundestag
 Federal Constitutional Court

Table b - Agencies within the remits of the federal ministries

Federal Foreign Office

- German Archaeological Institute

Federal Government Commissioner for Culture and the Media

- Akademie der Künste (Academy of the Arts)
- Federal Archives
- Federal Institute for Culture and History of the Germans in Eastern Europe
- Federal Chancellor Helmut Schmidt Foundation
- Federal Chancellor Willy Brandt Foundation
- 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
- Federal Foundation for the Study of the Communist Dictatorship in Germany
- Transit Film GmbH

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

Federal Ministry of Education and Research

- Federal Institute for Vocational Education and Training

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

Federal Ministry of Finance (excluding Customs)

- Federal Financial Supervisory Authority
- Federal Agency for Financial-Market Stabilization¹⁹
- Institute for Federal Real Estate
- Deutsche Bundespost Federal Posts and Telecommunications Agency
- Bundesrepublik Deutschland - Finanzagentur GmbH²⁰
- 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

Federal Ministry of Finance (Customs)

- Central Customs Authority

¹⁹ As of 1 January 2018, authority for the Federal Agency for Financial-Market Stabilization (FMSA) was transferred to the Finanzagentur GmbH. The FMSA retained the status of corporation under public law and is therefore still an autonomous authority.

²⁰ See footnote 19.

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

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

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

Federal Ministry for Economic Cooperation and Development

- Deutsche Gesellschaft für International Zusammenarbeit GmbH
- German Institute for Development Evaluation

Federal Ministry of the Interior, Building and Community

- Procurement Office of the Federal Ministry of the Interior
- Federal Office for Building and Regional Planning
- 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 for Central Services and Unresolved Property Issues and Federal Equalization of Burdens Office (cumulative data provided for two agencies)
- Federal Agency for Public Safety Digital Radio
- Federal Agency for Technical Relief
- Federal Equalization of Burdens Office
- Federal Institute for Population Research
- Federal Institute of Sport Science
- Federal Criminal Police Office
- Federal Police (cumulative data provided for 12 agencies)
- Federal Police Headquarters
- Federal Foundation of *Baukultur*
- 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

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

Federal Ministry for the Environment, Nature Conservation and Nuclear Safety

- 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 company for nuclear waste disposal, BGE)
- Gesellschaft für Zwischenlagerung mbH (the federal company for nuclear waste storage, BGZ)
- Federal Environment Agency
- Zukunft - Umwelt - Gesellschaft (ZUG) gGmbH

Federal Ministry of Defence (cumulative data provided for each agency level)

- Bundeswehr Training Centre
 - 16 lower-level authorities
- Federal Office of Bundeswehr Equipment, Information Technology and In-Service Support
 - 10 mid-level authorities
- Federal Office of Bundeswehr Personnel Management
 - 16 lower-level authorities
- Federal Office of Bundeswehr Infrastructure, Environmental Protection and Services
 - 52 lower-level authorities
- Federal Office of Languages
- Bw Bekleidungsmanagement GmbH
- BwConsulting GmbH
- BWI Informationstechnik GmbH
- Disciplinary Attorney General for the Bundeswehr at the Federal Administrative Court
- Bundeswehr Operations Command
 - 1 lower-level authority
- Office of the Protestant Church for the Bundeswehr
 - 4 mid-level authorities
 - 97 lower-level authorities
- Federal University of Applied Administrative Sciences, Federal Defence Administration Department
- Federal Armed Forces Command and Staff College
- GEKA Gesellschaft zur Entsorgung von chemischen Kampfstoffen und Rüstungsaltslasten mbH (Germany's state-owned company for disposing of chemical weapons)
- HIL Heeresinstandsetzungslogistik GmbH
- Office of the Catholic Bishop for the Armed Forces
 - 4 mid-level authorities
 - 80 lower-level authorities
- German Cyber and Information Domain Service Headquarters
 - 5 mid-level authorities
 - 19 lower-level authorities
- German Army Headquarters
 - 8 mid-level authorities
 - 96 lower-level authorities
- German Air Force Headquarters

- 2 mid-level authorities
- 69 lower-level authorities
- Federal Armed Forces Medical Corps Headquarters
 - 8 mid-level authorities
 - 35 lower-level authorities
- German Joint Support and Enabling Service Headquarters
 - 34 mid-level authorities
 - 53 lower-level authorities
- Federal Office of the Bundeswehr for Military Aviation
- German Navy Headquarters
 - 4 mid-level authorities
 - 58 lower-level authorities
- Bundeswehr Office for Defence Planning
- Bundeswehr Disciplinary and Complaints Court, North
- Bundeswehr Disciplinary and Complaints Court, South
- Bundeswehr University, Hamburg
- Bundeswehr University, Munich
- Leadership Development and Civic Education Centre
 - 1 mid-level authority
 - 1 lower-level authority

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 Institute for Waterway Engineering and Research
- 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
- Fluko Flughafenkoordination Deutschland GmbH
- 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 agencies).

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
- National Metrology Institute of Germany

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

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

Name of the supreme federal authority	No. of staff	Year of last 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 working in areas of activity especially vulnerable to corruption	Number of areas of activity especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out
AA	13,418	2018	R	6,580	6,580	6,580
BfDI	159	2013 or earlier	U	49	0	0
BKAmt	705	2018	U	108	116	116
BKM	295	2016	B	135	143	143
BMAS	1,157	2018	U	188	188	188
BMBF	1,171	2016	U	151	14	14
BMEL	994	2013 or earlier	R	102	0	0
BMF	1,990	2016	U	241	149	149
BMFSFJ	760	2018	R	94	94	0
BMG	740	2018	R	286	122	122
BMI	1,659	2015	B	447	447	447
BMJV	797	2017	R	384	384	384
BMU	1,377	2013 or earlier	U	195	60	60
BMVI	1,454	2015	R	257	158	158
BMVg	2,428	2018	R	724	724	724
BMWi	1,754	2018	U	639	578	274
BMZ	1,130	2016	B	295	304	304
BPA	526	2015	R	96	96	96
BPrA	218	2016	U	46	7	7
BR	206	2014	B	20	20	0
BRH	260	2013 or earlier	U	36	36	36
BT	2,622	2014	U	311	311	311
BVerfG	277	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					
				Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff members without a suitable replacement position at the same pay level	Other reasons
AA	6,580	1,744	1,744	Yes	Yes	Yes	Yes	Yes	Yes
BfDI	49	25	0	Yes	No	No	No	No	No
BKAmt	108	30	30	Yes	Yes	No	Yes	Yes	No
BKM	135	47	47	Yes	Yes	Yes	Yes	Yes	Yes
BMAS	188	not applicable*	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
BMBF	151	not applicable*	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
BMEL	102	not applicable*	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
BMF	241	85	0	Yes	Yes	Yes	Yes	Yes	No
BMFSFJ	94	21	0	No	No	No	No	No	Yes
BMG	286	not applicable*	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
BMI	447	159	89	Yes	Yes	Yes	Yes	Yes	Yes
BMJV	384	115	115	No	No	No	No	No	Yes
BMU	195	61	31	Yes	Yes	Yes	Yes	Yes	Yes
BMVI	257	not applicable*	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
BMVg	724	not applicable*	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable
BMW i	639	179	179	Yes	Yes	Yes	No	Yes	No
BMZ	295	43	33	Yes	Yes	Yes	Yes	No	Yes
BPA	96	49	49	Yes	Yes	Yes	No	No	No
BPrA	46	21	0	Yes	No	No	No	Yes	Yes
BR	20	10	4	Yes	No	Yes	No	Yes	No
BRH	36	16	16	Yes	Yes	Yes	Yes	No	Yes
BT	311	49	45	Yes	Yes	Yes	No	Yes	No
BVerfG	0	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable	not applicable

* Not applicable due to insufficient data.

Table d: Special regulations (applicable within the agency or to cooperation with subordinate agencies)

Name of the supreme federal authority	The agency has special regulations ...			Special regulations apply to cooperation with subordinate agencies...			
	... 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	...on handling cases of suspected corruption	... requiring cases of suspected corruption to be reported	... requiring regular reports to the supreme federal authority on the implementation of the Directive	... requiring other measures of administrative and task-related supervision
AA	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BfDI	No	No	No	not applicable	not applicable	not applicable	not applicable
BKAmt	No	No	Yes	not applicable	not applicable	not applicable	not applicable
BKM	No	No	No	No	No	No	No
BMAS	Yes	Yes	Yes	No	No	Yes	Yes
BMBF	No	No	Yes	No	No	No	No
BMEL	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BMF	Yes	Yes	Yes	No	Yes	Yes	Yes
BMFSFJ	Yes	Yes	No	not applicable	not applicable	not applicable	not applicable
BMG	No	No	No	No	No	Yes	Yes
BMI	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BMJV	No	Yes	Yes	Yes	Yes	Yes	Yes
BMU	Yes	Yes	Yes	Yes	Yes	No	Yes
BMVI	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BMVg	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BMW _i	Yes	Yes	Yes	Yes	Yes	No	No
BMZ	Yes	Yes	Yes	not applicable	not applicable	not applicable	not applicable
BPA	No	No	No	not applicable	not applicable	not applicable	not applicable
BPrA	No	No	Yes	not applicable	not applicable	not applicable	not applicable
BR	No	No	No	not applicable	not applicable	not applicable	not applicable
BRH	No	No	Yes	not applicable	not applicable	not applicable	not applicable
BT	Yes	Yes	Yes	not applicable	not applicable	not applicable	not applicable
BVerfG	Yes	Yes	No	not applicable	not applicable	not applicable	not applicable

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			IT-assisted workflows which (perhaps in addition to other advantages) also ensure compliance with the principle of greater scrutiny						
	Second staff member checking work results	Plausibility checks	IT-assisted workflows	Procurement measures	Allocation of funds (institutional or 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	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
BfDI	No	Yes	Yes	Yes	No	No	No	No	No	Yes
BKAmt	Yes	Yes	Yes	Yes	No	No	No	Yes	No	No
BKM	Yes	Yes	Yes	No	No	No	Yes	Yes	No	No
BMAS	Yes	Yes	Yes	Yes	No	No	Yes	No	No	No
BMBF	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	No
BMEL	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	No
BMF	Yes	Yes	Yes	Yes	No	No	No	Yes	No	No
BMFSFJ	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	No
BMG	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes
BMI	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes
BMJV	Yes	Yes	Yes	No	No	No	Yes	No	No	No
BMU	Yes	Yes	Yes	No	Yes	No	No	No	No	Yes
BMVI	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No
BMVg	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
BMWi	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
BMZ	Yes	Yes	Yes	Yes	No	No	No	No	No	No
BPA	Yes	Yes	Yes	No	No	No	No	No	No	Yes
BPrA	Yes	Yes	No	not applicable	not applicable	not applicable	n.a.	n.a.	n.a.	n.a.
BR	No	Yes	Yes	Yes	No	No	Yes	No	No	No
BRH	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No
BT	Yes	Yes	Yes	No	No	No	Yes	Yes	No	Yes
BVerfG	Yes	Yes	No	not applicable	not applicable	not applicable	n.a.	not applicable	not applicable	n.a.

Table f: Contact between the contact persons for corruption prevention and agency management

Name of the supreme federal authority	Reason for contact between the contact person for corruption prevention and agency management	Frequency of contact without specific reason with agency management in the reporting year
AA	Contact with and without specific reason.	Less than once every six months, but at least once a year.
BfDI	No contact within the reporting year.	No contact within the reporting year.
BKAmt	Contact also took place without specific reason.	Less than once a month, but at least once every six months.
BKM	No contact within the reporting year.	No contact within the reporting year.
BMAS	Contact also took place without specific reason.	Less than once a month, but at least once every six months.
BMBF	Contact only with specific reason (e.g. a case of suspected corruption).	not applicable
BMEL	No contact within the reporting year.	not applicable
BMF	Contact only with specific reason (e.g. a case of suspected corruption).	not applicable
BMFSFJ	Contact with and without specific reason	Less than once a month, but at least once every six months.
BMG	No contact within the reporting year.	not applicable
BMI	Contact also took place without specific reason	Less than once a month, but at least once every six months.
BMJV	No contact within the reporting year.	not applicable
BMU	No contact within the reporting year.	not applicable
BMVI	Contact also took place without specific reason.	Less than once a month, but at least once every six months.
BMVg	Contact with and without specific reason.	Less than once a month, but at least once every six months.
BMWi	Contact also took place without specific reason.	Less than once a month, but at least once every six months.
BMZ	Contact also took place without specific reason.	Less than once a month, but at least once every six months.
BPA	No contact within the reporting year.	not applicable
BPrA	Contact also took place without specific reason.	Less than once every six months, but at least once a year.
BR	No contact within the reporting year.	not applicable
BRH	No contact within the reporting year.	not applicable
BT	Contact also took place without specific reason.	Once a month or more frequently.
BVerfG	Contact only with specific reason (e.g. a case of suspected corruption).	not applicable

Table g: Corruption awareness and training

Name of the supreme federal authority	Number of staff	Corruption-awareness measures including training sessions			Corruption-awareness measures applied (other than training)							Training (no. of staff trained)
		Number of staff who received corruption-awareness training	Number of staff working in areas of activity particularly vulnerable to corruption who received corruption-awareness training	Number of supervisors and managers who received corruption-awareness training	Discussion with supervisors	Discussion with contact person	Discussion with DG/division responsible for HR or organizational	Discussion with awareness raising during employee events	IT-assisted options (not training)	Transfer/handling out information sheets	Other measures	
AA	13,418	13,418	6,580	631	Yes	Yes	Yes	Yes	Yes	Yes	Yes	577
BfDI	159	1	0	0	No	Yes	No	No	No	No	No	1
BKAmt	705	705	108	113	No	Yes	Yes	Yes	No	Yes	No	17
BKM	295	35	0	1	Yes	Yes	Yes	No	No	Yes	No	0
BMAS	1,157	115	34	18	Yes	Yes	No	Yes	No	Yes	No	20
BMBF	1,171	1,171	151	128	No	Yes	Yes	No	Yes	Yes	No	135
BMEL	994	4	0	0	No	No	No	No	No	Yes	Yes	4
BMF	1,990	144	8	5	No	Yes	Yes	Yes	No	Yes	No	1
BMFSFJ	760	760	94	106	No	Yes	No	Yes	Yes	Yes	No	3
BMG	740	114	88	19	No	Yes	No	No	No	Yes	No	86
BMI	1,659	188	18	13	Yes	Yes	Yes	Yes	Yes	Yes	Yes	19
BMJV	797	198	182	61	Yes	Yes	Yes	Yes	Yes	Yes	Yes	198
BMU	1,377	157	94	6	No	Yes	No	Yes	Yes	Yes	No	122
BMVI	1,454	1,454	0	5	Yes	Yes	Yes	Yes	Yes	Yes	Yes	175
BMVg	2,428	2,351	674	229	Yes	Yes	Yes	Yes	Yes	Yes	Yes	149
BMWi	1,754	1,380	619	139	Yes	No	Yes	Yes	No	No	No	1,380
BMZ	1,130	1,130	295	128	Yes	Yes	Yes	Yes	Yes	Yes	No	64
BPA	526	30	7	1	No	No	No	No	No	Yes	No	0
BPrA	218	23	2	2	Yes	Yes	Yes	Yes	No	Yes	No	0
BR	206	0	0	0	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	0
BRH	260	4	4	3	Yes	Yes	No	No	Yes	Yes	No	0
BT	2,622	1,522	311	210	Yes	Yes	Yes	Yes	No	Yes	No	0
BVerfG	277	23	0	4	No	Yes	No	No	No	No	No	0

Annex 3: Implementation of the Directive by the agencies within the remits of the federal ministries**Table a: Areas of activity especially vulnerable to corruption; risk analyses**

Remit	Level	Number of agencies	Number of staff	Number of agencies with available data on areas of activity especially vulnerable to corruption	Number of staff with available data on areas of activity especially vulnerable to corruption	Number of staff working in areas of activity especially vulnerable to corruption	Number of areas of activity especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out
AA	Not attributable to a specific level	1	431	1	431	48	47	46
BKM	Higher federal authorities	2	2,117	2	2,117	118	80	80
BKM	Legal entity under civil law	2	617	1	614	90	90	90
BKM	Not attributable to a specific level	16	3,572	14	3,375	481	309	97
BMAS	Higher federal authorities	1	599	1	599	383	367	367
BMAS	Federal courts	2	360	2	360	15	15	6
BMAS	Not attributable to a specific level	4	38,169	3	28,000	3,499	3,499	2,466
BMBF	Not attributable to a specific level	1	646	1	646	82	82	0
BMEL	Higher federal authorities	6	4,564	6	4,564	392	104	102
BMEL	Legal entity under civil law	1	223	0	0	not applicable	not applicable	not applicable
BMEL	Not attributable to a specific level	2	2,430	2	2,430	878	32	0
BMF	Higher federal authorities	1	2,254	1	2,254	1,531	85	85
BMF	Legal entity under civil law	4	1,921	4	1,921	570	472	472
BMF	Not attributable to a specific level	6	12,976	5	12,866	3,637	4,515	4,511
BMF (Customs)	Higher federal authorities	1	7,051	1	7,051	104	0	0
BMF (Customs)	Lower-level federal authorities	51	32,894	51	32,894	978	30	27
BMFSFJ	Higher federal authorities	2	1,427	2	1,427	412	331	325
BMG	Higher federal authorities	5	3,534	5	3,534	1,037	750	608
BMI	Higher federal authorities	15	29,809	15	29,809	11,131	3,787	3,742
BMI	Lower-level federal authorities	12	35,467	12	35,467	1,803	1,667	1,659
BMI	Not attributable to a specific level	5	678	3	591	225	206	206

Remit	Level	Number of agencies	Number of staff	Number of agencies with available data on areas of activity especially vulnerable to corruption	Number of staff with available data on areas of activity especially vulnerable to corruption	Number of staff working in areas of activity especially vulnerable to corruption	Number of areas of activity especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out
BMJV	Higher federal authorities	2	3,532	2	3,532	1,768	1,346	1,768
BMJV	Federal courts	4	880	4	880	213	103	97
BMJV	Not attributable to a specific level	1	288	1	288	136	136	136
BMU	Higher federal authorities	4	2,680	4	2,680	1,866	1,463	0
BMU	Legal entity under civil law	3	2,153	1	187	24	23	23
BMVI	Higher federal authorities	14	9,630	12	9,322	3,632	1,271	1,187
BMVI	Mid-level federal authorities	1	839	1	839	414	159	159
BMVI	Lower-level federal authorities	46	11,173	46	11,173	3,851	1,530	1,499
BMVI	Legal entity under civil law	4	5,515	3	5,486	393	12	12
BMVI	Not attributable to a specific level	1	669	1	669	46	19	19
BMVg	Higher federal authorities	21	22,700	16	not specified*	2,223	2,157	2,157
BMVg	Mid-level federal authorities	81	33,291	68	not specified*	762	588	435
BMVg	Lower-level federal authorities	593	158,467	392	not specified*	2,371	1,217	931
BMVg	Federal courts	2	42	2	42	1	0	0
BMVg	Legal entity under civil law	5	5,366	3	not specified*	149	34	34
BMWi	Higher federal authorities	6	8,216	6	8,216	2,356	594	520
BMZ	Legal entity under civil law	2	21,394	1	91	66	6	0

* As only cumulative data are available, no specific information can be provided.

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

Remit	Number of agencies	Number of agencies which updated their data on areas of activity especially vulnerable to corruption in ...		
		the last five years (2014 and later)	more than five years ago (2013 and earlier)	No data basis
AA	1	0	1	0
BKM	20	13	4	3
BMAS	7	4	2	1
BMBF	1	1	0	0
BMEL	9	5	3	1
BMF	11	9	1	1
BMF (Customs)	52	52	0	0
BMFSFJ	2	1	1	0
BMG	5	3	2	0
BMI	32	26	4	2
BMJV	7	7	0	0
BMU	7	4	1	2
BMVI	66	59	2	5
BMVg	702	466	32	204
BMWi	6	5	1	0
BMZ	2	1	0	1

Table c: Staff rotation in the agencies within the remits of the federal ministries

Remit	Total number of staff	Number of agencies for which relevant data are available	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 the failure to rotate					
					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	431	1	28	28	1	1	0	0	1	0
BKM	6,306	14	346	84	14	7	2	2	7	2
BMAS	39,128	2	134	134	2	2	1	0	1	0
BMBF	646	1	50	0	1	1	0	0	1	0
BMEL	7,217	3	65	65	1	1	0	0	0	1
BMF	17,151	7	1,653	1,648	6	7	3	2	3	5
BMF (Customs)	39,945	2	476	405	1	2	2	1	1	2
BMFSFJ	1,427	2	29	29	2	1	1	0	1	0
BMG	3,534	3	247	159	3	3	2	2	1	0
BMI	65,954	12	2,348	974	10	12	7	3	6	4
BMJV	4,700	5	971	928	5	4	2	2	4	2
BMU	4,833	3	132	132	2	2	1	1	1	0
BMVI	27,826	9	3,188	2,068	9	6	6	4	5	2
BMVg	219,866	128	992	706	53	65	17	13	43	12
BMW _i	8,216	5	721	537	5	4	3	0	5	2
BMZ	21,394	1	26	26	1	1	0	0	1	0

Table d: Measures taken to compensate for the failure to rotate

Current data are available only for the remits listed

Remit	Number of agencies for which data on compensatory measures are available	Number of agencies having stated that they carry out these compensatory measures					
		Extending the principle of greater scrutiny	Working in teams	Changing tasks within an organizational unit	Other transfer of responsibilities (to compensate for corruption risks)	Intensifying administrative and task-related supervision	Other measures
AA	1	1	0	0	0	1	0
BKM	6	6	3	0	1	4	1
BMAS	2	2	1	0	1	2	0
BMBF	0	0	0	0	0	0	0
BMEL	2	2	1	0	0	1	1
BMF	6	6	6	4	4	6	5
BMF (Customs)	2	2	1	2	2	2	1
BMFSFJ	2	1	1	0	0	2	0
BMG	2	2	2	1	1	1	0
BMI	7	4	5	4	4	7	5
BMJV	4	4	2	2	1	3	4
BMU	2	2	1	2	1	2	0
BMVI	8	8	5	6	5	6	3
BMVg	Not specified*	47	20	5	8	54	12
BMW <i>i</i>	4	4	2	4	1	4	1
BMZ	1	1	1	1	0	0	0

* As only cumulative data are available, no specific information can be provided.

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

Remit	Number of agencies which have special regulations...			Number of agencies which exercise task-related supervision of other agencies	Number of agencies which have regulations on cooperation with subordinate agencies...			
	... 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		... on handling cases of suspected corruption	... requiring cases of suspected corruption to be reported	... requiring subordinate agencies of the supervisory agency to provide regular reports on the implementation of the Directive	... requiring other measures of administrative and task-related supervision
AA	0	1	1	0	not applicable	not applicable	not applicable	not applicable
BKM	6	6	5	0	not applicable	not applicable	not applicable	not applicable
BMAS	4	4	4	0	0	0	0	0
BMBF	0	0	0	0	not applicable	not applicable	not applicable	not applicable
BMEL	6	6	5	0	not applicable	not applicable	not applicable	not applicable
BMF	8	8	9	2	1	0	0	2
BMF (Customs)	2	2	2	1	1	1	1	1
BMFSFJ	1	1	1	0	not applicable	not applicable	not applicable	not applicable
BMG	3	3	4	0	not applicable	not applicable	not applicable	not applicable
BMI	13	15	11	1	1	1	1	1
BMJV	4	4	6	0	not applicable	not applicable	not applicable	not applicable
BMU	4	5	6	1	1	1	0	1
BMVI	17	17	12	2	2	2	2	2
BMVg	244	240	135	168	97	99	70	89
BMW _i	4	3	4	0	not applicable	not applicable	not applicable	not applicable
BMZ	2	2	2	0	not applicable	not applicable	not applicable	not applicable

Table f: Principle of greater scrutiny and transparency

Remit	Number of agencies where the following measures were taken to support the principle of greater scrutiny and transparency			Number of agencies with IT-assisted workflows for...						
	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 decisions relevant to the public	... other processes
AA	0	1	1	0	0	0	0	1	0	0
BKM	19	18	10	8	2	1	7	8	2	4
BMAS	7	7	7	5	0	2	4	6	3	0
BMBF	1	1	1	1	1	1	1	1	0	1
BMEL	8	9	8	7	3	3	5	5	3	5
BMF	10	11	8	7	1	1	4	6	2	7
BMF (Customs)	2	2	2	2	1	1	2	2	1	2
BMFSFJ	2	2	1	1	1	0	0	0	1	0
BMG	5	5	5	3	1	1	4	4	2	2
BMI	18	18	18	16	6	6	12	14	7	10
BMJV	6	7	6	5	1	0	5	6	5	4
BMU	7	7	6	6	2	0	5	5	1	2
BMVI	17	21	20	15	6	2	19	11	7	6
BMVg	389	494	526	298	35	32	308	401	30	222
BMW i	6	6	6	6	1	1	5	6	3	2
BMZ	2	2	2	2	0	0	1	2	0	1

Table g: Contact person for corruption prevention

Remit	Total number of staff	Number of agencies	Number of agencies with their own contact person	Number of agencies where the contact person was affiliated to another agency	Number of agencies without a contact person	Number of contact persons	Number of contact persons in full-time positions	Reason for contact between the contact person and agency management				Frequency of regular contact between the contact person and agency management		
								No specific reason.	Specific reason (e.g. a case of suspected corruption).	Both with and without specific reason.	No contact within the reporting year.	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	431	1	1	0	0	1	0.01	1	0	0	0	0	0	1
BKM	6,306	20	20	0	0	23	1.90	14	1	3	2	4	6	7
BMAS	39,128	7	7	0	0	13	1.95	5	0	2	2	4	6	7
BMBF	646	1	1	0	0	1	0.25	1	0	0	0	0	1	0
BMEL	7,217	9	9	0	0	14	2.89	5	0	1	3	1	4	1
BMF	17,151	11	10	1	0	19	5.73	8	1	1	0	1	7	1
BMF (Customs)	39,945	52	52	0	0	74	16.38	0	0	2	0	2	0	0
BMFSFJ	1,427	2	1	1	0	1	0.10	0	0	0	1	0	0	0
BMG	3,534	5	5	0	0	8	1.35	3	1	0	1	1	1	1
BMI	65,954	32	31	1	0	198	26.60	12	1	5	1	6	11	0
BMJV	4,700	7	7	0	0	12	1.29	4	1	0	2	1	3	0
BMU	4,833	7	6	1	0	9	1.75	5	0	1	0	2	2	2
BMVI	27,826	66	17	49	0	26	6.77	9	1	7	4	3	6	7
BMVg	219,866	702	368	293	36	454	95.19	392	24	68	51	234	121	106
BMWi	8,216	6	6	0	0	8	1.26	5	1	0	0	1	3	0
BMZ	21,394	2	2	0	0	5	2.02	0	0	2	0	1	1	0

Table h: Corruption awareness and training

Remit	Corruption-awareness measures, including training			Corruption-awareness measures applied (other than training)							Training offered (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	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	431	48	57	1	0	0	1	0	1	0	0
BKM	1,323	219	233	10	11	4	10	2	7	5	266
BMAS	4,524	3,306	177	4	5	3	5	1	3	3	47
BMBF	646	82	50	0	1	1	1	1	0	0	30
BMEL	1,262	378	264	4	5	1	4	2	3	2	209
BMF	10,435	4,590	826	6	8	3	8	1	8	4	1,020
BMF (Customs)	8,598	397	407	2	2	1	2	1	1	1	30
BMFSFJ	335	114	46	2	1	1	2	0	1	1	42
BMG	2,269	810	145	4	5	1	4	2	5	1	79
BMI	26,002	6,288	2,597	13	17	10	15	9	16	7	4,146
BMJV	918	274	89	4	4	2	4	5	4	5	129
BMU	1,875	1,446	172	6	4	4	4	3	4	1	108
BMVI	14,791	5,851	939	19	18	13	15	8	15	9	971
BMVg	145,651	4,975	8,003	343	348	43	229	152	251	144	4,208
BMWi	2,871	1,445	107	5	5	5	3	1	3	2	533
BMZ	5,794	66	253	2	1	1	2	1	0	1	5,703

Annex 4: Further development of corruption-prevention measures

Federal administration as a whole

Measure	Number of agencies which in 2018 ...		
	... planned (adopted) specific corruption-prevention measures	... launched corruption-prevention measures	... implemented corruption-prevention measures
New implementation directives	39	47	24
New training measures	201	74	19
Organizational measures	118	124	32
Area- and job-related measures	106	75	29
Ombudsperson	8	6	7
Electronic whistle-blowing option	89	49	23
Other	23	47	28