



Federal Ministry
of the Interior

Preventing corruption in the federal administration

Annual report for 2014

Version of 19 June 2015

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Development and results of corruption prevention in the federal administration Annual report for 2014

I. Preliminary remarks

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

Based on a resolution of the Auditing Committee made at its second session on 14 February 2014 regarding agenda item 5, in the previous year the Federal Ministry of the Interior began producing the report using a computer-assisted survey of all federal authorities. As announced in the report for 2013, improvements were made in terms of technology and content in preparing the present report, including wording questions more clearly and making the form available via the Internet as well as via federal networks.

As the result of a resolution by the Auditing Committee at its eleventh session on 19 December 2014 concerning agenda item 12, the authorities and other federal bodies referred to in this report are presented in a list ([Annex 1](#)). Basic information is provided on the number of authorities and staff covered by the Federal Government Directive Concerning the Prevention of Corruption. Measures to prevent corruption are summarized and presented in table form based on the tables in the annual report for 2012. Reference figures have been provided wherever possible as needed for understanding and comparability. Comparability with earlier reports is limited by the fact that some federal ministries have been reconfigured and their remits altered accordingly.

The annual report for 2013 included information of individual categories for the first time; this information is also included in the present report.

The report shows the executive agencies of the federal ministries, divided into higher, middle and lower levels; it also shows bodies, such as companies and foundations, which do not fit into such a scheme.

Like its predecessors, the present report contains an overview of cases of suspected corruption and the overall enforcement of the Federal Government Directive.

At the request of the German Bundestag, this annual report, like that for 2013, will be published on the Internet after its referral to the German Bundestag.

II. Selected results

- This report covers 585,522 staff* in 1,113 authorities, workplaces and other bodies of the federal administration.
- In 2014, 0.004% of federal administrative staff were the subject of investigations on suspicion of corruption, typical related offences such as fraud, breach of trust or corruption-related breach of duty.
- In the 2014 reporting year, 26 proceedings on suspicion of corruption, most of them from the previous year, involving federal staff or third parties were concluded. In roughly one-third of these proceedings, sufficient evidence of guilt was found to impose punishment or disciplinary measures.
- Twenty-one of 23 supreme federal authorities have current, reliable data on jobs which are especially vulnerable to corruption. The remaining two supreme federal authorities have been involved in major restructuring and are currently gathering the necessary data.
- Reliable data are available on 99.22% of jobs in federal executive agencies (other than those of the Federal Ministry of Defence) especially vulnerable to corruption. The Federal Ministry of Defence, which has undergone major restructuring due to the reorganization of the Bundeswehr, has made significant progress in identifying jobs within its remit which are especially vulnerable to corruption (data gathered or updated for 297 workplaces in calendar year 2014 alone).
- For gathering data, the instrument of updating is very important due to the use of electronic human resources management systems.
- After determining the need for risk analysis of jobs, such analyses were carried out for 90.87% of jobs within the remit of the Federal Ministry of Defence and for 89.14% of jobs within the remit of the remaining federal ministries.
- The principle of job rotation, in which staff employed in areas especially vulnerable to corruption are rotated to different positions after no more than five years, is not usually applied because the relevant staff are specialists who cannot be rotated or because they have other specialized skills which are difficult to replace.
- All the supreme federal authorities have appointed their own contact persons for corruption prevention. The same applies to all executive agencies other than those within the remit of the Federal Ministry of Defence, in which 47 of 761 workplaces have yet to appoint a contact person. In this area, too, the major restructuring within the remit of the Federal Ministry of Defence should be noted.

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

- Within the federal administration, corruption prevention was the task of 437.47 full-time equivalents in 2014. A total of 1,223 persons acted as contact persons for corruption prevention.
- In 2014, 234,059 federal administration staff, including 14,579 supervisory staff, received initial or follow-up corruption-awareness training. In 2014, 536 supervisory staff served as trainers, instructors or advisers for corruption-awareness training.
- 18,127 federal administration staff were enrolled in initial or advanced corruption-prevention courses which went beyond corruption-awareness training.
- When asked which new corruption-prevention measures they were planning, had initiated or completed, authorities most often mentioned new training courses.

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

1. General note

No. 1.1 of the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration of 30 July 2004 applies to all authorities of the direct and indirect federal administration (i.e. the direct federal corporations, offices and foundations created for specific federal tasks) as well as the courts and special federal funds. This report does not cover the social insurance institutions (with approx. 140,000 staff) although in terms of administrative organization they are part of the indirect federal administration. According to the principle of self-government (Section 29 (1) of the Social Code, Book IV), federal administrative regulations pursuant to Article 86 (1) of the Basic Law which affect the core area of self-government do not apply to the social insurance institutions. The same is true of the Bundesbank. Nor does the Federal Government Directive apply directly to the Federal Employment Agency, the German Federal Pension Insurance, the German Pension Insurance Miners, Railway and Maritime or the Federal Accident Insurance Fund (which merged with the Railway Accident Insurance Fund effective 1 January 2015 to become the Federal and Railway Accident Insurance). But these four have voluntarily agreed to apply the Directive and are therefore counted with the authorities of the direct federal administration within the remit of the Federal Ministry for Labour and Social Affairs.

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

Again for this report, it was not possible to enter the data for the Federal Ministry of Defence in the database used for the automated analysis due to the special technical features within that ministry's remit. For this reason and because of the large number of staff within the Federal Ministry of Defence remit, which would have distorted the overall results had their data been combined with those of the other ministries' remits, the Defence remit is described separately in certain places.

As in previous years' reports, information on the customs administration is given separately in some cases.

2. Number of staff, of authorities and other bodies

Data were compiled on 352 authorities and other bodies of the federal administration outside the defence remit having a total of 338,048 staff, and on 761 workplaces within the remit of the Federal Ministry of Defence having 247,474 staff. These are broken down

as follows into authorities, workplaces and other bodies of the highest, higher, mid- and lower levels and into bodies which cannot be assigned to any of these levels:

Outside the remit of the Federal Ministry of Defence

Level	No. of authorities / workplaces / other bodies	No. of staff
Supreme federal authorities	23	31,639
Higher federal authorities	69	63,729
Mid-level federal authorities	8	7,536
Lower-level federal authorities	108	75,355
Other bodies (e.g. foundations, companies, self-governing bodies)	144	159,789
TOTAL	352	338,048

Within the remit of the Federal Ministry of Defence

Level	No. of workplaces	No. of staff
Supreme federal authorities	1	2,205
Higher federal authorities	20	20,086
Mid-level federal authorities	149	85,557
Lower-level federal authorities	591	139,626
TOTAL	761	247,474

This report thus covers 585,522 staff in 1,113 authorities, workplaces and other bodies of the federal administration.

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

To further increase the informational value of the report and make the grouping of the various kinds of authorities and other bodies more transparent, in future reports the possibility of creating additional categories for “other bodies” (such as court administrations or legal persons under private law) will be considered.

3. Scope of this report (authorities, workplaces and other bodies)

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

This report does not cover most social insurance institutions (see 1 above) or certain authorities, workplaces or other bodies for the following reasons:

Within the remit of the Federal Ministry of Finance, the Federal Institute for Special Tasks Arising from Unification (BvS) was not included. Since 2001, it has existed only as a legal entity and holder of assets; it no longer has any staff of its own. Nor does this report cover the Federal Agency for Financial-Market Stabilization, the Financial-Market Stabilization Fund (FMSA), the Bundesdruckerei GmbH or the Federal Republic of Germany – Finance Agency. According to its no. 1.2, the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration “applies accordingly to legal entities under public or civil law which are wholly owned by the Federal Republic of Germany”. The Recommendation on No. 1 of the Directive states that “accordingly” in no. 1.2. “means that the Directive is to be applied by the legal entities under public or private law referred to there unless this conflicts with the divergent legal form”. On this legal basis, among others, the Federal Ministry of Finance chose not to include the above-mentioned entities in the report. It will repeat this review before the annual report for 2015 is produced and include them then if appropriate.

Deutsche Bahn AG is not included in the report due to its special character as a business enterprise previously part of the public administration and one in which a separate compliance system is used.

The new Federal Office for the Regulation of Nuclear Waste Management (BfE) within the remit of the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety went into operation on 1 September 2014 and is still in the start-up phase. In 2014, it did not yet have its own staff, so it did not take any measures to prevent corruption.

Under no. 1.2 of the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration, two companies come under the responsibility of the Federal Government Commissioner for Culture and the Media: the Kulturveranstaltungen des Bundes in Berlin GmbH (KBB) and the Transit-Film-Gesellschaft mbH. In view of the special importance of preventing corruption, the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration also applies accordingly to these two companies. Corruption prevention measures are being reviewed and revised in both companies due to examinations by the Bundesrechnung-

shof which also looked at corruption prevention. As a result, it would not be useful to answer the survey to prepare the report or to include the companies in the current report. The measures will largely be completed over the course of the year, so that participation in the survey for the annual report for 2015 is planned.

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, such as about the structure and methods of these services. The Federal Government reports on these matters only to the bodies of the German Bundestag which are responsible for oversight of the intelligence services.

IV. Cases of suspected corruption and proceedings concluded in 2014

1. Overview of proceedings initiated

In the 2014 reporting year, in the direct and indirect federal administration a total of 19 criminal investigations were initiated (2013: 19, 2012: 12, 2011: 34, 2010: 31) against a total of 21 federal employees in connection with corruption offences in the narrower sense or with typical related offences such as fraud or breach of trust. In addition, five disciplinary proceedings were initiated against five federal employees in connection with corruption in the broader sense without initial suspicion of criminal wrongdoing. This means that in the 2014 calendar year, 0.004% of the federal administration staff were suspected of corruption-related activity.

2. Individual proceedings initiated

a) Federal Ministry of Economic Affairs and Energy

During the review of a different institution, suspicion of a criminal offence (taking bribes, Section 331 of the German Criminal Code) or a corruption-like act (attempted fraud, sections 263 and 23 of the German Criminal Code) committed by a ministry employee could not be ruled out. The investigation initiated by the public prosecutor on the basis of this suspicion was terminated in early 2015 in accordance with Section 170 (2) of the German Code of Criminal Procedure for lack of evidence. The disciplinary proceedings initiated in parallel on suspicion of performance of duties for personal gain are still under way.

In 2009, an employee of the Federal Ministry of Economic Affairs and Energy accepted an award from a club and notified the ministry. The award did not come with a monetary prize. In 2014, the Berlin public prosecutor opened an investigation on suspicion of taking bribes (Section 331 of the German Criminal Code) after the matter was reported by a third party. The investigation was terminated for lack of sufficient evidence pursuant to Section 170 (2) of the German Code of Criminal Procedure. No disciplinary proceedings were initiated because there was at no time any suspicion of a breach of duty.

An employee of the Federal Office for Economic Affairs and Export Control was the subject of an anonymous complaint in 2014 alleging preference for foreign companies when issuing permits for private security services to protect sea-going ships. The resulting investigation was terminated for lack of sufficient evidence pursuant to Section 170 (2) of the German Code of Criminal Procedure.

b) Federal Foreign Office

The Federal Foreign Office reported three proceedings at diplomatic missions abroad, with a total of five suspects. Two of these proceedings (involving three suspects) had to do with issuing visas; one proceeding (involving two suspects) was on suspicion of taking bribes (collusion with a contractor) in a construction project at a diplomatic mission abroad.

c) Federal Ministry of the Interior

At the Procurement Office of the Federal Ministry of the Interior, one civil servant was under investigation on suspicion of aiding a breach of trust, among other things. The investigation was related to the case reported for 2013. In conjunction with the investigation, disciplinary proceedings were initiated, resulting in the dismissal in October 2014 of the civil servant who was in his probationary period. The Federal Police opened disciplinary proceedings against two officers who showed their official identification cards to gain entry to a football match without paying admission, creating the impression that they were open to taking bribes. In the same reporting year, the officers were required to pay fines 50 times the value of the favour received.

d) Federal Ministry of Finance (Customs)

aa) Proceedings involving own staff

Within the remit of the Federal Ministry of Finance (Customs), two criminal investigations were opened, each involving one staff member. The staff were suspected of involvement in unlawful transit procedures of under-invoiced container shipments by a company in which goods were not presented to the customs authorities. In one case, internal data are thought to have been forwarded to a participant in the customs treatment procedure. The responsible public prosecutor is investigating on suspicion of taking bribes and violation of official secrecy coinciding with making false entries in public records (sections 332 and 348 of the German Criminal Code) and on suspicion of professional and organized tax evasion (sections 370 and 373 of the German Fiscal Code).

bb) Proceedings involving persons not employed by Customs

Furthermore, within the remit of the Federal Ministry of Finance (Customs) six proceedings against persons not employed by Customs were initiated in 2014, two of which were also concluded in 2014. The six cases involved various areas of the customs administration. In each case, money was offered, either directly in person or in a letter. Four of the

cases were investigated on suspicion of attempted bribery as an incentive to violate official duties in accordance with Section 334 of the German Criminal Code (StGB), and two cases were investigated on suspicion of bribery (Section 333 StGB). One proceeding pursuant to Section 333 StGB was terminated on condition of payment. In one proceeding pursuant to Section 334 StGB, the participant was ordered to pay a fine. The four remaining proceedings are still under way.

e) Federal Ministry of Defence

Within the remit of the Federal Ministry of Defence, three disciplinary proceedings were opened, each involving one staff member. In one case, possible favours demanded by a company with regard to inspections were reported anonymously. In another case, alleged manipulation of expert opinions on dental services was reported anonymously, along with preferential treatment for certain vendors of advanced training. In the course of preliminary disciplinary investigation of another matter, indications were found that an employee was involved in corruption (taking bribes) in the area of contract awards and processing of invoices.

f) Federal Ministry of Transport and Digital Infrastructure

A public prosecutor is investigating an employee within the remit of the Federal Ministry of Transport and Digital Infrastructure on suspicion of restricting competition through agreements in the context of public bids according to Section 298 StGB.

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

An employee within the remit of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety was the subject of a criminal investigation on suspicion of having given preferential treatment to a certain institution when awarding research funding in order to obtain certain favours for him- or herself or family members. In another case, an attempt to procure a replacement part not necessary for operations was suspected. The investigation led to further suspicions that two employees had circumvented (service) regulations on ordering items under a certain value set by procurement law in order to provide preferential treatment to certain companies. The employees were suspected of having done so in return for benefits in kind (cars) and cash payments. One of the employees in question was dismissed immediately; he has filed an action for protection from dismissal. Two employees of a company in which the Federation has no shares and which is alleged to have received favours are also being investigated in this matter.

h) Federal Employment Agency

Six criminal investigations of Federal Employment Agency staff were initiated in the 2014 calendar year; in each case, one person was under investigation. One case involved suspicion of producing fake rental contracts in cooperation with the landlord and benefits recipients as well as using confidential data; the advantage received was likely the use of a car including tax and insurance payments as well as a regular “petrol allowance” of €50. The subsequent criminal proceeding resulted in a conviction of taking bribes and a fine of 180 daily rates at €50 each. In another case, an employee is suspected of approving services in exchange for favours requested and under threat of sanctions if such favours were not provided. The third case concerns suspicion of biased advising of start-up entrepreneurs directing them to one particular business consultant in return for favours. Another case involves suspicion of preference given to training providers in return for favours, allegedly in the form of construction work performed on private property by recipients of support with supplied materials. Another case involves suspicion of preference for a coach when approving funding in return for favours. In the sixth case, a client of the Federal Employment Agency is suspected of having unlawfully received benefits (basic income support) totalling €1,425 in return for favours, roughly half of which was allegedly returned to the suspect.

3. Overview of proceedings concluded

During the 2014 reporting year and until the start of 2015, 26 proceedings involving suspected corruption, mostly from the previous year, were concluded: 20 criminal proceedings and six disciplinary proceedings. Four of the criminal proceedings ended with a criminal conviction or warning. Three disciplinary proceedings ended with a disciplinary sanction pursuant to the law on civil servants; one proceeding resulted in the dismissal of a civil servant on probation. The remaining proceedings were terminated; in one case, although the criminal proceeding was terminated, a disciplinary sanction was issued. In another case, the criminal proceeding was terminated but the disciplinary proceeding is still pending. In yet another case, a criminal proceeding is still under way following the dismissal of a civil servant on probation. In roughly one-third of the concluded criminal and disciplinary proceedings, sufficient evidence of guilt was found to impose punishment.

Proceedings concerning the remit of the Federal Ministry for Economic Affairs and Energy (three criminal proceedings, all of which were terminated although one continues as a disciplinary proceeding) and the remit of the Federal Ministry of the Interior (three disciplinary proceedings, two of which were terminated and one of which resulted in

dismissal, although a criminal proceeding continues) initiated and concluded during the reporting year (some in early 2015) have already been described in this report.

Within the remit of the Federal Ministry of Defence, six proceedings were concluded during the 2014 calendar year. Of these, four criminal proceedings ended with termination pursuant to Section 170 (2) of the Code of Criminal Procedure (lack of sufficient evidence). One disciplinary proceeding was terminated after the person in question was acquitted in criminal court in 2013. One case (attempted bribery of an official by a former fixed-term volunteer and employee of a private company that does business with the Bundeswehr) ended with a disciplinary sanction (demotion in rank) after a penal order had been issued in 2011.

Within the remit of the Federal Ministry of Transport and Digital Infrastructure, three proceedings were concluded in 2014. Of these, two were terminated pursuant to Section 170 (2) of the Code of Criminal Procedure (lack of sufficient evidence); in the third proceeding, an employee received a warning from the criminal court. The employee had awarded a contract to a company which had not submitted the least expensive bid. At the urging of the vendor that had submitted the least expensive bid, the contract was cancelled and awarded to the vendor with the least expensive bid.

A regional court gave an employee of the Federal Employment Agency a suspended sentence of one year and eight months on 77 counts of breach of trust for intentionally and in some cases unlawfully approving benefits (including wage subsidies) for a non-profit organization in which the defendant served as a board member. Due to the severity of the sentence, he was automatically dismissed from employment as a civil servant when the sentence was final. Another concluded case involved preferential treatment of clients seeking employment in exchange for favours; the defendant received a suspended sentence of two years on charges of taking bribes and of sexual assault. Four investigations of Federal Employment Agency staff in connection with IT procurement were terminated pursuant to Section 170 (2) of the Code of Criminal Procedure (lack of sufficient evidence); in one proceeding, a reprimand was issued as a disciplinary measure. Two other proceedings, one on suspicion of bribery and one on suspicion of taking bribes, were also terminated pursuant to Section 170 (2) of the Code of Criminal Procedure (lack of sufficient evidence). A further criminal proceeding involving a Federal Employment Agency staff member initiated in 2014 and concluded with a conviction has already been described in this report.

A criminal proceeding involving an employee of the German Pension Insurance Miners, Railway and Maritime suspected of violating procurement regulations was terminated

pursuant to Section 153a of the Code of Criminal Procedure (termination while imposing conditions and instructions upon the accused if these are of such a nature as to eliminate the public interest in criminal prosecution).

V. Implementation status of the Directive

1. Areas of activity especially vulnerable to corruption

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

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

Identifying and analysing areas of activity especially vulnerable to corruption

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

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

Recommendation on No. 2 of the Directive

Identifying and analysing areas of activity especially vulnerable to corruption

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

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

The handbook on identifying areas of activity especially vulnerable to corruption offers extensive assistance with conducting this procedure.

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

2. Areas of activity especially vulnerable to corruption

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

- a. *a. areas in which staff influence on decision-making may lead to advantages of significant value to others, and*
- b. *b. activities involving at least one of the following:*
 - *frequent outside contacts, especially monitoring and supervisory activities,*
 - *management of large budgets, award of public contracts, subsidies, grants or other funds,*

2. Areas of activity especially vulnerable to corruption

- imposing of conditions, granting of concessions, approvals, permits and the like, setting and levying of fees,
- processing of transactions and operations using internal information not intended for third parties.
- This list is not exhaustive. In certain cases, activities may be especially vulnerable to corruption even in the absence of these characteristics.

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

3. Risk analysis

3.1 In areas of activity especially vulnerable to corruption,

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

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

The standardized procedures for identifying areas of activity especially vulnerable to corruption have stood the test since their introduction in 2007. The aim is to improve ease of use and also make it easier for staff and supervisors to classify an area of activity by answering specific questions. The Directive allows for a two-step procedure which it describes in greater detail; it also allows for the procedure to be carried out in one step, which in some cases requires less organizational effort. Describing the results of the first and second steps would result in values that are not comparable to each other, because different authorities take different approaches. For this reason, the practice of including these results in the annual report that was followed up to 2012 was discontinued for the 2013 annual report.

a) Identifying areas of activity especially vulnerable to corruption

The standardized procedures help identify areas of activity especially vulnerable to corruption in a comparable way. [Annex 2, Table a](#) provides an overview of the areas of activity especially vulnerable to corruption within the supreme federal authorities, while [Annex 3, Table a](#) does the same for their executive agencies.

All the supreme federal authorities have carried out and finalized a review of their areas of activity especially vulnerable to corruption at least once. One supreme federal authority, the Federal Constitutional Court, has identified no such areas.

For the Federal Ministry of Defence, no reliable current figures are available. The figures from the most recent complete review in 2005 are no longer up to date. As part of the restructuring of the Bundeswehr, ministerial tasks within the Federal Ministry of Defence were reorganized effective 1 April 2012. This reorganization made it necessary to conduct a new review of vulnerable areas of activity; this review is still ongoing.

All of the other supreme federal authorities have conducted full reviews or updates since 2008. Nine supreme federal authorities have current data on vulnerable areas of activity from 2014 based on complete reviews or updates.

Leaving aside the social insurance institutions subject to special conditions when collecting data (the Federal Employment Agency and the German Pension Insurance Miners, Railway and Maritime), the amount of data collected for the executive agencies (not including the Federal Ministry of Defence) is as follows: In the remits of nine of 15 federal ministries, reliable data on jobs especially vulnerable to corruption are available for all executive agencies. In the remaining seven remits, no reliable data are available for executive agencies with a total of 1,491 staff. On the cut-off date for data collection, a total of 190,964 staff were employed in the 15 remits referred to (not including the above-mentioned social insurance institutions). As a result, reliable data on especially vulnerable jobs in the federal ministries' executive agencies are available for 99.22% of staff positions. So almost all staff positions have been reviewed.

Within the remit of the Federal Ministry of Defence, no reliable current data on especially vulnerable areas are available for six (of 20) workplaces at the higher administrative level, for 36 (of 149) workplaces of the mid-level administration or for 258 (of 591) workplaces of the lower-level administration.

Following full reviews in recent years, the instrument of updating has become increasingly important in gathering data. Electronic personnel management systems have made it possible to keep updated records and statistics on which staff perform certain tasks and thus work in areas especially vulnerable to corruption, without the need for time-consuming full reviews and also in case of changes in staffing or organization.

By the data collection cut-off date, existing data on 95,368 staff (49.94%) in the remits of the federal ministries other than the Federal Ministry of Defence were based on full re-

views, on 73,524 staff (38.50%) on updates, on 10,357 staff (5.42%) on partial reviews and on 10,224 staff (5.35%) partly on full reviews and partly on updates within the same authority. Within the remit of the Federal Ministry of Defence, the existing data on especially vulnerable areas are based on updates.

Please see the explanation at the bottom of [Table a in Annex 3](#) regarding special conditions for the Federal Employment Agency and the German Pension Insurance Miners, Railway and Maritime.

b) Risk analysis

Seventeen supreme federal authorities identified a need for a risk analysis regarding areas of activity especially vulnerable to corruption, and risk analyses were conducted in 15 supreme federal authorities.

In the remits of 12 federal ministries not including the Federal Ministry of Defence, the need for risk analysis for a total of 23,428 jobs especially vulnerable to corruption was reviewed; risk analyses were conducted in 11 of these remits for a total of 20,884 especially vulnerable jobs, or 89.14%. Within the remit of the Federal Ministry of Defence, the need for risk analysis was reviewed for 3,295 especially vulnerable jobs; risk analyses were conducted for 2,994 especially vulnerable jobs, or 90.87%.

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 or due to organizational concerns predating the risk analysis. So it is not possible to determine the number of cases in which risk analysis was responsible for introducing such measures. This report, like the one for 2013, therefore does not include information on this point.

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

No. 4 of the Directive: Staff

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

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

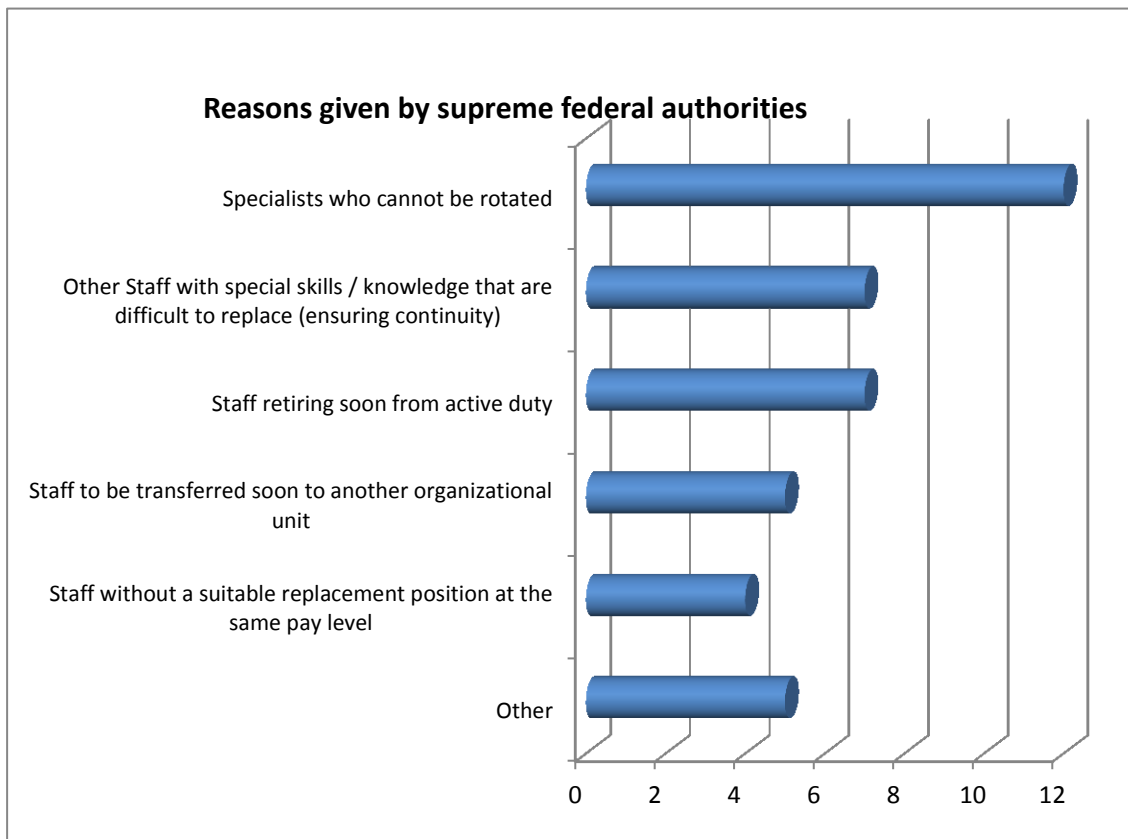
Rotating staff and tasks can help prevent corrupt relationships from forming. If rotation is not possible at all or not within the recommended time, the reasons should be recorded and other recommended measures to prevent corruption should be taken.

a) The length of assignment to jobs especially vulnerable to corruption provides information on staff rotation. The share of staff assigned to areas especially vulnerable to corruption for more than five years was

- more than 75% in no supreme federal authority,
- between 50% and 75% in two supreme federal authorities, and
- less than 50% in eleven supreme federal authorities.

No information is available for the remaining supreme federal authorities, or the reference date is less than five years in the past due to the recent risk analysis.

The supreme federal authorities explained their failure in some cases to rotate after five years as follows:

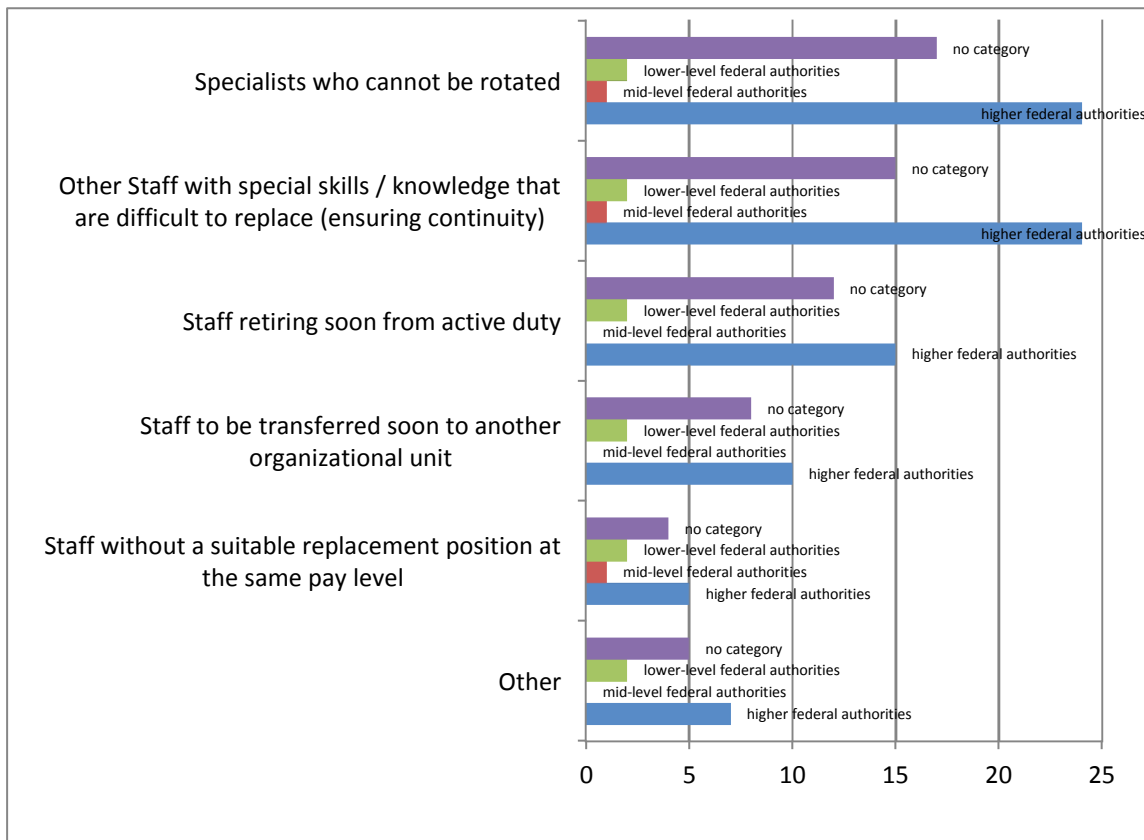


b) Some executive agencies did not have complete data on the length of staff assignments to jobs especially vulnerable to corruption. Information is available for 168 executive agencies (other than within the remit of the Federal Ministry of Defence) and a total of 150,751 staff. In the executive agencies for which data are available, on average

- 50.15% of staff in a higher federal authority,
- 11.32 % of staff in a mid-level federal authority,
- 53.76 % of staff in a lower-level federal authority, and
- 32.44% of staff in other categories of authorities

were assigned to an especially vulnerable job for more than five years. No Federal Police staff were assigned to an especially vulnerable job for more than five years.

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



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

Data on the length of staff assignment to especially vulnerable jobs are available for 10 workplaces at the higher administrative level, 59 workplaces at the mid-level and 184 workplaces at the lower level. Within the remit of the Federal Ministry of Defence, the number of staff counted in this way who were assigned the same or similar tasks especially vulnerable to corruption for more than five years was 32 at the higher administrative level, 132 at the mid-level and 574 at the lower level, for a total of 738. Of these, 391 (52.98%) were subject to corruption-prevention measures to compensate for the risks related to a lack of rotation.

3. Administrative and expert supervision

Rigorous administrative and expert supervision is a key instrument for preventing corruption.

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

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

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

Twelve supreme federal authorities (including the Federal Ministry of Defence) and 170 executive agencies, as well as 381 workplaces within the remit of the Federal Ministry of Defence have specific regulations on monitoring staff as to how they perform their duties (administrative supervision). Twelve supreme federal authorities, 172 executive agencies and 361 workplaces within the remit of the Federal Ministry of Defence have specific regulations on monitoring lawfulness and expedience (task-related supervision). Seventeen supreme federal authorities, 167 executive agencies and 103 workplaces 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.

Overall, 13 supreme federal authorities have regulations on cooperation with the executive agencies within their remit (multiple answers were possible):

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

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

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

4. Principle of greater scrutiny and transparency

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.

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

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

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

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

- through regulations requiring a second staff member to check work results, meaning that different people are responsible for working on the same task;
 - (co-)review and monitoring of work results by additional staff (plausibility check).
- a) Twenty-one supreme federal authorities and 212 executive agencies as well as 413 workplaces within the remit of the Federal Ministry of Defence require a second staff member to check work results.
 - b) Twenty-two supreme federal authorities and 214 executive agencies as well as 422 workplaces within the remit of the Federal Ministry of Defence conduct plausibility checks.
 - c) To fulfil the principle of greater scrutiny, IT-assisted workflows are used in 19 supreme federal authorities and 201 executive agencies as well as 328 workplaces 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](#) and [Annex 3, Table f](#).

5. Contact person for corruption prevention

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

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

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

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

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

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

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

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

All of the current supreme federal authorities have had their own contact persons for corruption prevention since 2005. The Federal Commissioner for Data Protection and Freedom of Information will assume the status of a supreme federal authority effective 1 January 2016 and did not yet have a contact person for corruption prevention during the reporting year.

All executive agencies and other bodies within the remit of the federal ministries other than the Federal Ministry of Defence have contact persons for corruption prevention.

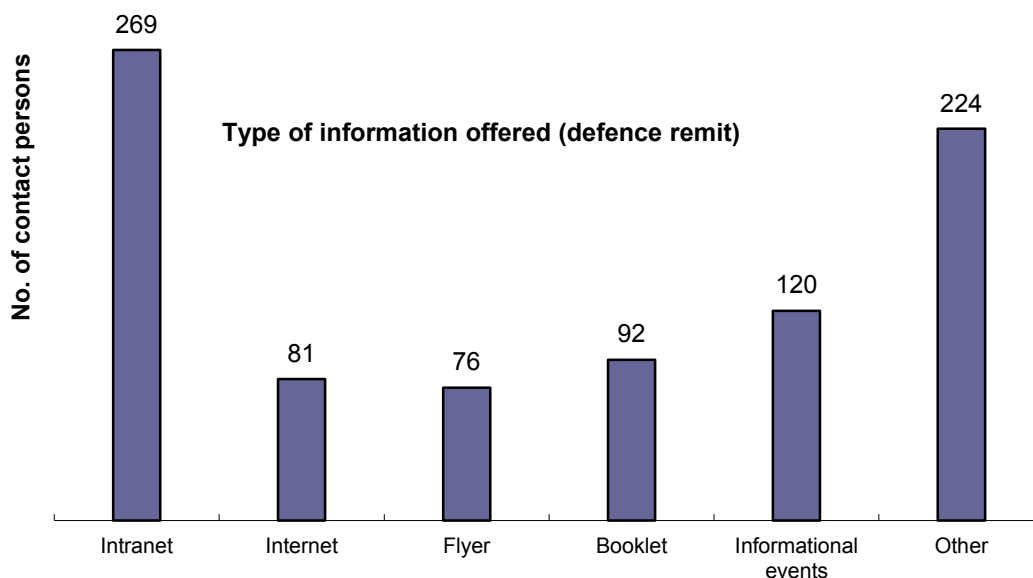
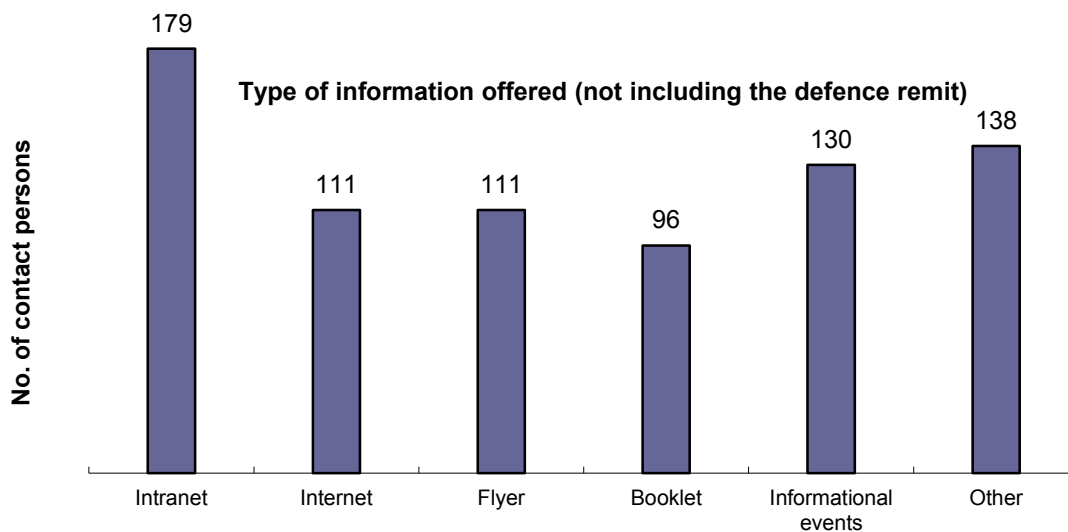
Fifty-seven executive agencies or bodies share a contact person with another agency. These are

- the Federal Institute for Population Research (37 staff),
- the Federal Institute of Sport Science (36 staff),
- the Federal Department for Media Harmful to Young Persons (20 staff),
- the Federal Agency for Administrative Services (161 staff),
- the seven field offices of the Bundesrechnungshof (German SAI) (52 staff as administrative personnel), and

- 46 local offices for waterways and shipping and offices for new construction (11,434 staff).

Forty-seven workplaces (of 744 reporting) within the remit of the Federal Ministry of Defence have not yet appointed a contact person for corruption prevention. Two hundred eighty-three workplaces (266 of them in the lower-level administration) share a contact person with another agency.

The type and frequency of information provided by contact persons is shown in the following graphic (multiple answers possible):



During the reporting year, 563 contact persons (including 407 within the Federal Ministry of Defence and its remit) met with agency management to discuss corruption prevention. This was a significant increase over the previous year (283 contact persons). [Annex 2, Table f](#) and [Annex 3, Table g](#) show the reasons for contacts and their frequency.

In the entire federal administration (not including the Federal Ministry of Defence and its remit), 195.45 full-time equivalents (as far as it was possible to collect specific figures) were assigned corruption prevention tasks. Performing the tasks of contact person for corruption prevention accounted for approximately 100 full-time equivalents, carried out by 470 persons. Other corruption prevention tasks were performed by 650 persons, accounting for 95.45 full-time equivalents. Within the Federal Ministry of Defence and its remit, an addition 753 persons (162.31 full-time equivalents) were responsible for the tasks of contact person for corruption prevention, while 366 persons (79.71 full-time equivalents) were assigned other corruption prevention tasks. As a result, within the federal administration, corruption prevention was the task of 437.47 full-time equivalents.

6. Staff awareness

No. 7 of the Directive: Staff awareness and education

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

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

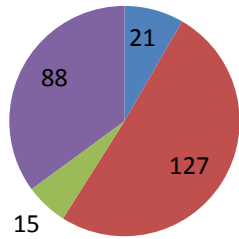
In the entire federal administration (not including the remit of the Federal Ministry of Defence), a total of 88,538 staff (out of a total of 338,048, i.e. 26.19%), including 7,553 supervisory staff, received corruption-awareness training. This does not mean that no such measures were provided for the remaining staff; some authorities reported comprehensive awareness-raising campaigns in recent years. Three hundred ninety-nine supervisory staff members were involved in providing awareness-raising measures as trainers, instructors or advisers.

Within the Federal Ministry of Defence and its remit, 145,521 staff (out of a total of 247,474, or 58.80%), including 7,026 supervisory staff, received corruption-awareness training. One hundred thirty-seven supervisory staff members were involved in providing awareness-raising measures as trainers, instructors or advisers.

As the following charts show, in more than half of authorities, staff working in areas of activity especially vulnerable to corruption receive corruption-awareness training at least every two years; those within the remit of the Federal Ministry of Defence receive such training every year.

Repetition of corruption-awareness training for staff in areas especially vulnerable to corruption (as available)

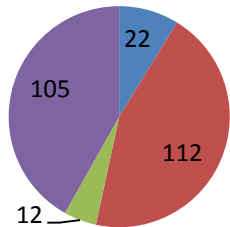
No. of authorities reporting (other than the Federal Ministry of Defence and its remit)



- not repeated
- repeated every year
- repeated every two years
- repeated less often

Repetition of corruption-awareness training for all other staff

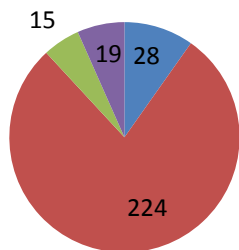
No. of authorities reporting (other than the Federal Ministry of Defence and its remit)



- not repeated
- repeated every year
- repeated every two years
- repeated less often

Repetition of corruption-awareness training for staff in areas especially vulnerable to corruption (as available)

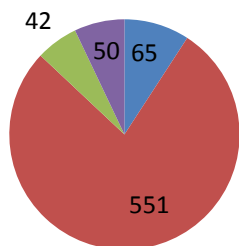
No. of workplaces (Federal Ministry of Defence and its remit)



- not repeated
- repeated every year
- repeated every two years
- repeated less often

Repetition of corruption-awareness training for all other staff

No. of workplaces (Federal Ministry of Defence and its remit)



- not repeated
- repeated every year
- repeated every two years
- repeated less often

7. *Basic and advanced training*

No. 8 of the Directive: Basic and advanced training

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

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

In addition to an electronic learning programme, the Federal Academy of Public Administration (BAkÖV), the central federal training facility, always offers courses on preventing and fighting corruption and on preventing corruption in at-risk areas. These courses are intended especially for supervisory staff in the higher and higher intermediate service, for contact persons for corruption prevention, staff of organizational units responsible for preventing corruption and for staff in areas especially vulnerable to corruption. The courses deal with the forms corruption can take; recognizing behaviour that can corrupt; the tasks of the contact person for corruption prevention: fighting corruption (including relevant law and regulations); the national and international dimensions of corruption; the consequences pursuant to criminal, public service and labour law for those engaged in corrupt behaviour; how to speak and act in cases of suspected corruption. The special office for basic and advanced training of the Federal Ministry of Transport and Digital Infrastructure and the Federal Revenue Administration’s Training and Knowledge Centre offer largely identical training seminars; the Federal Revenue Administration also offers special seminars for Customs Administration supervisory staff, while the Bundeswehr’s training centre offers orientation courses for contact persons for corruption prevention. The Federal Ministry of Transport and Digital Infrastructure has introduced its own electronic learning programme for the ministry and its remit. During the reporting period, 9,522 staff of the ministry and its remit successfully completed courses using this programme.

Overall, 13,012 staff took part in basic and advanced training by the supreme federal authorities and their remit (not including the Federal Ministry of Defence); at least 4,736 of them were staff in areas especially vulnerable to corruption (not all authorities make this distinction for all course participants). Within the Federal Ministry of Defence and its

remit, 5,115 staff participated in basic and advanced training on preventing corruption; 355 of them were identified as working in jobs especially vulnerable to corruption.

Executive staff of the ministries and workplaces in 91.6% of the authorities reporting (other than the Federal Ministry of Defence and its remit) received corruption prevention training. In 2014, 2,894 supervisory staff were trained in preventing corruption, and 181 supervisory staff members were involved in training measures as trainers, instructors or advisers. Within the Federal Ministry of Defence and its remit, 667 supervisory staff received such training, and 26 supervisory staff were actively involved in providing the training.

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

Three supreme federal authorities furnished the following additional information on developments in their area of responsibility to aid in understanding the data they reported regarding themselves and their remits.

Federal Ministry of Justice and Consumer Protection

Three agencies within the remit of this federal ministry (Federal Patent Court, Federal Office of Justice, German Patent and Trade Mark Office) in 2014 completed their review identifying areas of activity especially vulnerable to corruption; two other agencies (Public Prosecutor General of the Federal Court of Justice, Federal Finance Court) will do so in 2015.

Federal Ministry of Finance (Customs)

Roughly 80% of the Customs Administration, as an administrator of revenue, consists of areas of activity which can be classified as especially vulnerable to corruption according to the criteria of the Federal Government Directive. For this reason, all areas of activity at the level of the supreme federal authority and the subject-area divisions were reviewed for corruption risk and the areas especially vulnerable to corruption identified. Then risk analyses were conducted in all areas identified as especially vulnerable to corruption. In the process, the safeguards and measures to ensure proper task performance already defined were compiled for the core processes and activities in the areas especially vulnerable to corruption.

Wherever the responsible divisions found that these safeguards for certain core processes and activities were not sufficient to prevent concrete risk of corruption, these activi-

ties were identified as especially vulnerable to corruption. Possible additional preventive measures were then reviewed which could counter the risk of corruption.

This information, extending to threat assessments, for all areas of activity in the Customs Administration was compiled in a risk atlas for preventing corruption in the Customs Administration.

The Customs Administration's internal audit units use this risk atlas when drawing up the annual review schedule; during their reviews, they check whether the individual corruption prevention measures are being carried out in the individual areas of activity of the Customs Administration. The risk atlas is also available to the Federal Ministry of Finance divisions responsible for legal and technical supervision and to the legal and technical supervision of the federal finance offices and of the Customs Criminological Office.

The risk atlas has been an integral element of the overall strategy for preventing corruption in the Customs Administration since 2007. It is regularly revised and updated following organizational changes and with input from the internal audit units and relevant divisions.

Bundesrechnungshof

The Governing Board of the Bundesrechnungshof (BRH), Germany's supreme audit institution, has repeatedly and intensively studied the Federal Government Directive and found that the Directive cannot apply directly to the BRH's area of audit or be binding for it, because administrative regulations issued pursuant to Article 86, first sentence of the Basic Law cannot apply to workplaces like the BRH which are outside the remit of any federal ministry. The Federal Government cannot issue any administration regulations for such workplaces without legal authorization. The BRH enjoys constitutional autonomy and independence (Article 114 (2), first sentence of the Basic Law in conjunction with Section 1, first sentence of the Bundesrechnungshof Act), which prohibits outside intervention in its decision-making authority.

The BRH shares the Federal Government's goal of preventing corruption and therefore considers itself obligated to take appropriate measures to prevent corruption also in its area of audit. For this reason, the BRH has considered the extent to which provisions of the Federal Government Directive concerning the Prevention of Corruption should be incorporated into the BRH regulations (in particular its rules of procedure and for audits) in order to do justice to the goal of preventing corruption, which is also important for

the integrity of the BRH's area of audit. The BRH found that the key aims of the Directive are already fully implemented within its current regulations. In some cases, the BRH regulations are even much stricter than the requirements of the Federal Government Directive (for example regarding the principle of greater scrutiny in decisions).

In applying the Federal Government Directive, all audit panels also check whether a special risk of corruption exists for their area of audit; if necessary, they coordinate the necessary measures with the contact person for corruption prevention.

If tasks are identified as especially vulnerable to corruption, the audit panels take concrete preventive measures (in particular personnel measures, rules on the distribution of tasks and definition of organizational processes). The subject areas assigned to the audit panels in the field offices are also included in the necessary corruption prevention measures.

As another measure related to auditing, the BRH has drawn up an overview of framework conditions and foundations for corruption prevention in the area of audit along with guidelines for risk assessment. Both documents are available to the BRH audit panels to help in assessing risks in their areas of responsibility. The guidelines help in identifying areas at risk for corruption. Any countermeasures necessary to prevent corruption also apply to the audit panels. The guidelines, which are specially tailored for auditing, make it possible to carry out the necessary reviews methodically and effectively.

The results of the risk assessment are summed up in a register of risks.

The audit panels are charged with paying greater attention to corruption prevention as a long-term task. In-house training in anti-corruption measures is also offered.

The comprehensive measures described above demonstrate that the BRH regards and deals with the prevention of corruption in the area of audit as an important long-term and executive duty.

VII. Further development of corruption prevention

The tasks resulting from the Federal Government Directive concerning the Prevention of Corruption in the Federal Administration are implemented by the supreme federal authorities and the executive agencies within their remits overall and in various ways, for example by identifying the areas of activity especially vulnerable to corruption and by appointing contact persons for corruption prevention. All the supreme federal authori-

ties have conducted at least one survey of areas of activity especially vulnerable to corruption.

The surveys also asked where the workplace surveyed saw or was using potential for further development in the field of corruption prevention. The responses to this question were as follows:

Measure	No. of (groups of) authorities other than the Federal Ministry of Defence and its remit
New implementation directives	43
New training measures	92
Organizational measures	58
Area- and job-related measures	51
Ombudsperson	21
Electronic whistle-blowing option	20
Other	20

Under “other”, authorities reported that the following measures were to be introduced, though they may already be in place in other authorities:

- revising/updating orders,
- repeated queries of areas at risk for corruption,
- instructions,
- intensive advising followed by evaluations, for example in case of awards and special official travel, in individual cases,
- adding an anti-corruption clause to larger-scale agreements,
- poster campaign,
- publishing calls for tender on homepages,
- extending corruption-awareness training to all staff,
- reorganizing the implementation of corruption prevention measures and cursory review of risk analyses,
- further developing existing strategy for obligation pursuant to the Act on the Formal Obligation of Persons other than Civil Servants as recommended by the internal audit unit,
- taking up and testing an internal monitoring system,
- written strategy for training and corruption awareness,
- new personnel information system that automatically records length of assignment to jobs especially vulnerable to corruption,
- defining measures to compensate for the inability to rotate staff (e.g. due to a high level of specialization),
- holding a general informational event,

- conducting a risk analysis for all jobs in an agency,
- introducing a principle of scrutiny by at least two or three staff members,
- having senior management, staff responsible for technical supervision and a specialized researcher share ideas for preventing corruption;
- having the contact person hold an annual event on preventing corruption,
- providing information on corruption prevention in orientation for new staff,
- offering workshops on “dilemma training”,
- own training films for customs authorities,
- offering an electronic learning programme,
- annual meeting of the organizational units responsible for corruption prevention within an agency,
- new full review in 2015,
- evaluating the corruption prevention strategy.

This overview shows that many authorities have shown considerable initiative in developing their own ideas for improving corruption prevention which go beyond the Federal Government Directive.

Authorities other than the Federal Ministry of Defence and its remit furnished the following information on the implementation status of specific measures for the 2014 calendar year:

Measure	No. of (groups of) authorities which started implementing the measure in 2014	No. of authorities in which the measure has been implemented in 2014
New implementation directives	10	13
New training measures	12	13
Organizational measures	14	9
Area- and job-related measures	5	9
Ombudsperson	0	17
Electronic whistle-blowing option	1	9
Other	5	6

The following information was furnished for the Federal Ministry of Defence and its remit (individual workplaces may be counted here in more than one column):

Measure	No. of work-places in which the measure is planned	No. of workplaces which started implementing the measure in 2014	No. of workplaces in which the measure has been implemented in 2014
New implementation directives	91	21	27
New training measures	128	19	18
Organizational measures	66	38	44
Area- and job-related measures	58	18	31
Ombudsperson	33	2	2
Electronic whistle-blowing option	52	26	52
Other	34	11	23

Annexes

Annex 1: Authorities included in this report

Table a: Supreme federal authorities included in this report

The tables use the abbreviations listed below.

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

Abbreviation	Name of the supreme federal authority
BPA	Press and Information Office of the Federal Government
BKM	Federal Government Commissioner for Culture and the Media
BPrA	Federal President's Office
BVerfG	Federal Constitutional Court
BT	German Bundestag
BR	Bundesrat
BfDI	<p>The Federal Commissioner for Data Protection and Freedom of Information^{*)}</p> <p>^{*)} Declared a supreme federal authority ahead of the entry into force of the Second Act Amending the Federal Data Protection Act - Strengthening the Independence of Federal Data Protection Supervision by Establishing a Supreme Federal Authority of 25 February 2015 (Federal Law Gazette part I p. 162).</p>

Table b: Executive agencies included in this report

Without the defence remit

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

- Federal Office of Economics 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

Within the remit of the Federal Foreign Office

- German Archaeological Institute

Within the remit of the Federal Ministry of the Interior

- Federal Agency for Public Safety Digital Radio
- Procurement Office of the Federal Ministry of the Interior
- Federal Office for Civil Protection and Disaster Assistance
- Federal Centre for Cartography and Geodesy
- Federal Office for Migration and Refugees
- German Federal Office for Information Security
- Federal Agency for Technical Relief
- Federal Institute for Population Research
- Federal Institute of Sport Science
- Federal Criminal Police Office
- Federal Police (cumulative data provided for eleven authorities)

- Federal Police Headquarters
- Federal Office of Administration
- Federal Agency for Civic Education
- Federal University of Administrative Sciences
- Federal Statistical Office

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

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

Within the remit of the Federal Ministry of Finance (without customs administration)

- Federal Office of Central Services and Unresolved Property Issues and Federal Equalisation of Burdens Office (cumulative data provided for two authorities)
- Federal Financial Supervisory Authority
- Institute for Federal Real Estate
- Deutsche Bundespost Federal Posts and Telecommunications Agency
- Federal Central Tax Office
- Land Utilization and Management (BVVG),
subsidiary of the Federal Institute for Special Tasks Arising from Unification
- Energiewerke Nord GmbH
- Lusatian and Central German Mining Management Company

- Museum Foundation Post and Telecommunications
- Posts and Telecommunications Accident Insurance Fund
- Federal Disposal Sales and Marketing Agency
- Centre for Data Processing and Information Technology

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

- Federal Finance Offices, Customs Criminological Office, Training and Research Centre (data were provided all at once for seven authorities)
- Federal Spirits Monopoly Administration
- Main Customs Offices, Customs Investigation Offices (cumulative data provided for 51 authorities)

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

- Federal Employment Agency
- Federal Institute for Occupational Safety and Health
- Federal Social Court
- Federal Insurance Office
- German Federal Pension Insurance
- German Pension Insurance Miners, Railway and Maritime
- The President of the Federal Labour Court
- Federal Accident Insurance Fund

Within the remit of the Federal Ministry of Food and Agriculture

- Federal Office of Consumer Protection and Food Safety
- Federal Office for Agriculture and Food
- Federal Institute for Risk Assessment
- Federal Office of Plant Varieties

- German Biomass Research Centre
- Friedrich Loeffler Institute
- Johann Heinrich von Thünen Institute
- Julius Kühn Institute
- Max Rubner Institute – Federal Research Centre for Nutrition and Food

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

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

Within the remit of the Federal Ministry of Health

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

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

- Federal Office for Goods Transport
- Federal Maritime and Hydrographic Agency
- Federal Institute of Hydrology
- Federal Institute for IT Services
- Federal Highway Research Institute
- Federal Agency for Administrative Services
- Federal Institute for Waterway Engineering
- German Air Navigation Services

- Federal Railway Property Agency
- German Federal Bureau of Aircraft Accident Investigation
- Federal Bureau of Maritime Casualty Investigation
- German Meteorological Service
- Federal Railway Authority
- Federal Waterways and Shipping Agency
- Federal Motor Transport Authority
- Federal Aviation Office
- Offices for waterways and shipping and offices for new construction (cumulative data provided for 46 authorities).

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

- Asse GmbH
- Federal Office for Building and Regional Planning
- Federal Agency for Nature Conservation
- Federal Office for Radiation Protection
- Federal Foundation for Baukultur
- Federal Environmental Agency

Within the remit of the Federal Ministry of Education and Research

- Federal Institute for Vocational Education and Training

Within the remit of the Bundesrechnungshof (Germany's supreme audit institution)

- Administrative staff of the field offices of the Bundesrechnungshof (data were provided all at once for seven authorities)

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

- Academy of Arts

- Federal Archives
- The Federal Commissioner for the Files of the State Security Service of the Former German Democratic Republic
- Federal Institute for Culture and History of the Germans in Eastern Europe
- Federal Chancellor Willy Brandt Foundation
- Foundation for the Study of the SED Dictatorship
- German National Library
- German Federal Film Board
- Otto von Bismarck Foundation
- Bundeskanzler-Adenauer-Haus Foundation
- Bundespräsident-Theodor-Heuss-Haus Foundation
- Foundation Memorial to the Murdered Jews of Europe
- German Historical Museum Foundation
- Foundation of the Museum of Contemporary History of the Federal Republic of Germany
- Jewish Museum Berlin Foundation
- Prussian Cultural Heritage Foundation
- President Friedrich Ebert Foundation Memorial

Annex 2: Supreme federal authorities

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

Name of the supreme federal authority	Number of staff on the data collection cut-off date	Year of the latest full review re-garding areas of activity especially vulnerable to corruption or year of the latest complete update	Data on areas of activity especially vulnerable to corruption are based on updates (U), the latest 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 jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out (in relation to the number of jobs especially vulnerable to corruption)
BKAmt	667	2014	B	75	75	75
BMWi	1,562	2014	R	461	461	461
AA	12,995	2014	R	6,504	6,504	6,504
BMI	1,456	2012	U	407	472	472
BMJV	735	2011	A	20	23	0
BMF	1,955	2012	R	243	81	81
BMAS	1,173	2011	B	219	219	219
BMEL	928	2012	R	102	0	0
BMVg	2,205	Given the restructuring, the results of the latest full review (2008) do not provide reliable data.				
BMFSFJ	612	2012	R	189	0	0
BMG	649	2013	U	44	25	25

Name of the supreme federal authority	Number of staff on the data collection cut-off date	Year of the latest full review regarding areas of activity especially vulnerable to corruption or year of the latest complete update	Data on areas of activity especially vulnerable to corruption are based on updates (U), the latest 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 jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out (in relation to the number of jobs especially vulnerable to corruption)
BMVI	1,352	2014	R	The review of Federal Ministry of Transport and Digital Infrastructure focuses on tasks and not on positions. This means that, within the context of the risk analysis, no personal data are collected that indicate how many persons perform a certain task especially vulnerable to corruption. This is done at a later stage during the rotation review.		
BMUB	1,207	2014	B	228	65	65
BMBF	937	2011	U	150	9	9
BMZ	814	2014	U	262	262	262
BRH	242	2013	U	41	41	41
BPA	443	2010	U	88	88	88
BKM	233	2014	R	115	143	143
BPrA	195	2013	R	28	5	5
BVerfG	264	2008	U	0	0	0
BT	2,933	2014	R	293	293	293
BR	201	2014	B	20	9	0

Name of the supreme federal authority	Number of staff on the data collection cut-off date	Year of the latest full review regarding areas of activity especially vulnerable to corruption or year of the latest complete update	Data on areas of activity especially vulnerable to corruption are based on updates (U), the latest 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 jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out (in relation to the number of jobs especially vulnerable to corruption)
BfDI	86	2011	R	27	0	0

Table b: Staff rotation in areas of activity especially vulnerable to corruptionCurrent data are available only for the supreme federal authorities listed; see [comment in the report](#).

Name of the supreme federal authority	Staff having worked for more than five years in the same or similar areas of activity especially vulnerable to corruption (in brackets: percentage of available activities especially vulnerable to corruption)	Number of these staff for whom compensation 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 (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
BKAmt	36 (48%)	36	X	X			X	
BMWi	167 (36.2%)	167		X	X	X		
AA	2,161 (33.2%)	2,161	X	X	X			X
BMI	204 (50.1%)	150	X	X	X	X	X	X
BMJV	5 (25%)	5	X	X				X
BMG	18 (40.9%)	18	X	X	X	X		X
BMBF	35 (23.3%)	9	X	X	X	X		
BMZ	50 (19.08%)	13	X	X	X	X		
BRH	20 (48.78%)	20	X	X	X	X		X
BPA	44 (50%)	44	X	X	X	X	X	
BKM	45 (39.13%)	45	X	X	X			X
BPrA	20 (71.43%)	6	X				X	X
BT	100 (34.13%)	100	X	X	X		X	X

Name of the supreme federal authority	Staff having worked for more than five years in the same or similar areas of activity especially vulnerable to corruption (in brackets: percentage of available activities especially vulnerable to corruption)	Number of these staff for whom compensation measures were taken to reduce the risk	Reasons for the failure to rotate					Other reasons
			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	
BR	3 (15%)	3					X	

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

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

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

Name of the supreme federal authority	The authority has special regulations ...			There are regulations on cooperation with the executive agencies / bodies ...			
	... on monitoring staff performance of duties (administrative supervision)	... on monitoring lawfulness and expedience (task-related supervision)	... that are applied especially in all or some fields of areas of activity especially vulnerable to corruption*)	... on how to deal with cases of suspected corruption	... according to which cases of suspected corruption must be reported	... according to which executive agencies / bodies of the supreme federal authority must provide regular reports on the implementation of the directive on corruption prevention	... according to which other measures of administrative and task-related supervision are carried out
BKAmt	X		X	n/a			
BMWi	X	X	X	X	X	X	X
AA	X	X	X	X	X	X	X
BMI	X	X	X	X	X	X	X
BMJV		X	X	X	X	X	
BMF	X	X	X		X		X
BMAS	X	X	X	X		X	X
BMEL	X	X	X	X	X	X	X
BMVg	X	X	X	X	X	X	X
BMFSFJ				X	X	X	X
BMG						X	X
BMVI	X	X	X	X	X	X	X

Name of the supreme federal authority	The authority has special regulations ...			There are regulations on cooperation with the executive agencies / bodies ...			
	... on monitoring staff performance of duties (administrative supervision)	... on monitoring lawfulness and expedience (task-related supervision)	... that are applied especially in all or some fields of areas of activity especially vulnerable to corruption ^{*)}	... on how to deal with cases of suspected corruption	... according to which cases of suspected corruption must be reported	... according to which executive agencies / bodies of the supreme federal authority must provide regular reports on the implementation of the directive on corruption prevention	... according to which other measures of administrative and task-related supervision are carried out
BMUB	X	X	X	X	X	X	X
BMBF			X	n/a			
BMZ	X	X	X	n/a			
BRH			X	X	X		
BPA	X	X	X	n/a			
BKM							X
BPrA			X	n/a			
BVerfG				n/a			
BT			X	n/a			
BR				n/a			
BfDI				n/a			

^{*)}Examples include special tests, special conditions for awarding contracts and the publication of risk atlases

Table e: Principle of greater scrutiny and transparency

Name of the supreme federal authority	The following measures are 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 are used ... (Please note: Some authorities have other authorities assume these tasks; no X was used in these cases, even if the delegated authority uses IT-assisted workflows.)						
	Second staff member checking work results	Plausibility checks	IT-assisted workflows	.. for procurement measures	.. to award funds (institutional funding; project funding)	.. to settle benefit claims pursuant to civil service law	.. to settle travel expenses	.. for other measures with budgetary or other financial impact	.. to enact other administrative acts or administrative decisions relevant to the public	.. other processes
BKAmt	X	X	X	X				X		
BMW i	X	X	X	X	X		X	X		
AA	X	X	X	X	X			X	X	X
BMI	X	X	X	X			X	X		X
BMJV	X	X	X				X			
BMF		X	X	X				X		
BMAS	X	X	X				X			
BMEL	X	X	X	X	X			X		
BMVg	X	X	X	X	X		X	X	X	X
BMFSFJ	X	X	X	X	X			X		
BMG	X	X	X	X			X	X		
BMVI	X	X	X	X			X			
BMUB	X	X	X				X			
BMBF	X	X	X	X	X			X		

Name of the supreme federal authority	The following measures are 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 are used ... (Please note: Some authorities have other authorities assume these tasks; no X was used in these cases, even if the delegated authority uses IT-assisted workflows.)						
	Second staff member checking work results	Plausibility checks	IT-assisted workflows	... for procurement measures	... to award funds (institutional funding; project funding)	... to settle benefit claims pursuant to civil service law	... to settle travel expenses	... for other measures with budgetary or other financial impact	... to enact other administrative acts or administrative decisions relevant to the public	... other processes
BMZ	X	X								
BRH	X	X	X	X				X		
BPA	X	X								
BKM	X	X	X				X	X		
BPrA	X	X								
BVerfG	X	X								
BT	X	X	X				X	X		X
BR		X	X	X			X			
BfDI	X		X							X

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

Name of the supreme federal authority	Reason for contacts between the contact person for corruption prevention and the authority's executive level			Frequency of regular contacts between the contact person and the authority's executive level		
	No specific reason (e.g. within the context of a "jour fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	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
BKAmt	X				X	
BMWi			X		X	
AA	X					X
BMI	X					X
BMJV						
BMF	X					X
BMAS			X			X
BMEL			X			X
BMVg	X			X		
BMFSFJ						
BMG	X					X
BMVI			X		X	
BMUB	X					X
BMBF						
BMZ			X			X
BRH			X			X

Name of the supreme federal authority	Reason for contacts between the contact person for corruption prevention and the authority's executive level			Frequency of regular contacts between the contact person and the authority's executive level		
	No specific reason (e.g. within the context of a "jour fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	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
BPA			X		X	
BKM			X		X	
BPrA	X				X	
BVerfG	X				X	
BT			X		X	
BR	X					X

Table g: Corruption awareness and workshops

Name of the supreme federal authority	Corruption-awareness measures, including workshops, conducted in the <u>2014 calendar year</u>			Corruption-awareness measures applied (other than workshops)							Workshops offered in the 2014 calendar year (number of trained staff)	
	Number of staff who received corruption-awareness training in 2014	Number of staff who work in areas of activity especially vulnerable to corruption and received corruption-awareness training in 2014	Number of supervisory staff who received corruption-awareness training in 2014	Discussion with superiors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – no workshops – taken during employee events (such as orientation for new employees)	IT-assisted offerings (no workshops)	Handing out information material (instead of simply displaying it)		Other measures
BKAmt	667	75	97						X			20
BMWi	162	53	n.s.	X	X		X					1
AA	12,995	6,504	613	X	X	X	X	X	X	X	X	384
BMI	350	240	35	X	X	X	X	X	X	X		64
BMJV	121	0	12		X	X	X	X	X	X		0
BMF	80	n.s.	12				X		X	X		0
BMAS	99	23	11	X	X	X	X					0
BMEL	928	102	108		X				X			1
BMVg	2,049	n.s.	217	X	X	X	X	X	X	X	X	7
BMFSFJ	0	-	-									0
BMG	0	-	-									0
BMVI	1,352	n.s.	156	X	X	X	X	X	X	X	X	180
BMUB	59	11	40	X					X	X		3
BMBF	16	13	6	X	X	X	X	X	X	X		16
BMZ	59	16	7	X	X			X		X		3
BRH	11	7	3	X	X			X		X		2

*Annex 3: Executive agencies***Table a: Areas of activity especially vulnerable to corruption and risk analyses**

Remit and level of the authority	Number of authorities / number of staff on the data collection cut-off date	Number of authorities with available data / number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out
BMW Higher federal authorities	6 / 8,071	6 / 1,294	536	536
AA Not attributable to a certain level	1 / 324	1 / 46	46	46
BMI Higher federal authorities	11 / 20,731	11 / 5,515	5,310	4,121
BMI Lower-level federal authorities	11 / 33,110	11 / 1,590	1,619 ^{a)}	1,619
BMI Not attributable to a certain level	4 / 585	4 / 242	225	191
BMJV Higher federal authorities	4 / 3,730	4 / 1,534	1,431	1,431
BMJV Not attributable to a certain level	3 / 720	3 / 35	24	21

Remit and level of the authority	Number of authorities / number of staff on the data collection cut-off date	Number of authorities with available data / number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out
BMF higher federal authorities	4 / 6,542	4 / 2,280	89	51
BMF Not attributable to a certain level	9 / 11,034	7 / 3,755 (322)	3,866 ^{a)}	3,744
BMF - Federal Customs Administration Higher federal authority	1 / 26	1 / 4	1 See comments below	1 See comments below
BMF - Federal Customs Administration Mid-level federal authorities	7 / 6,571	7 / 106	27 See comments below	27 See comments below
BMF - Federal Customs Administration Lower-level federal authorities	51 / 30,811	51 / 936	27 See comments below	27 See comments below
BMAS Higher federal authority	1 / 554	1 / 383	367	367
BMAS Not attributable to a certain level	7 / 139,720	4 / 2,856 (115,657) See comment below.	2,807	2,463

Remit and level of the authority	Number of authorities / number of staff on the data collection cut-off date	Number of authorities with available data / number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out
BMEL Higher federal authorities	6 / 4,313	6 / 385	109	16
BMEL Not attributable to a certain level	3 / 2,047	2 / 867 (201)	12	0
BMVg Higher administration	20 / 20,086	10 / 1,728 (n.s.)	1,677	1,665
BMVg Mid-level administration	149 / 85,557	71 / 821 (n.s.)	634	460
BMVg Lower-level administration	591 / 139,626	219 / 1,999 (n.s.)	984	869
BMFSFJ Higher federal authorities	2 / 1,136	2 / 308	325 ^{*)}	325
BMG Higher federal authorities	5 / 3,263	5 / 946	616	481
BMVI Higher federal authorities	14 / 9,275	12 / 3,243 (351)	1,152	1,028
BMVI Mid-level federal authority	1 / 965	1 / 465	465	465

Remit and level of the authority	Number of authorities / number of staff on the data collection cut-off date	Number of authorities with available data / number of staff working in areas of activity especially vulnerable to corruption (in brackets, if appropriate: number of staff in authorities without available data)	Number of jobs especially vulnerable to corruption for which a risk analysis was considered necessary	Number of risk analyses carried out
BMVI Lower-level federal authorities	46 / 11,434	46 / 3,367	2,927	2,927
BMVI Not attributable to a certain level	1 / 694	1 / 43	19	19
BMUB Higher federal authorities	4 / 3,737	4 / 2,035	1,331	858
BMUB Not attributable to a certain level	2 / 398	1 / 31 (5)	10	3
BMBF Not attributable to a certain level	1 / 650	1 / 525	0	0
BRH Higher federal authorities	7 / 52	7 / 0	0	0
BKM Higher federal authorities	3 / 2,299	3 / 29	0	0
BKM Not attributable to a certain level	14 / 3,617	12 / 228 (400)	87	87

Comments on the data for the labour remit: The Federal Employment Agency and the German Pension Insurance Miners, Railway and Maritime do not identify areas of activity especially vulnerable to corruption in terms of the staff active in these areas, but in terms of tasks and areas. Areas of activity especial-

ly vulnerable to corruption have been identified and measures to prevent corruption have been initiated in both corporations. For both institutions, no specific number of the staff working in areas of activity especially vulnerable to corruption is available. To be able to compare data, the statistical survey also records the number of staff working in areas of activity especially vulnerable to corruption. Both aforementioned corporations therefore had to say no when asked about the availability of a reliable number of staff working in areas especially vulnerable to corruption.

Comments on the data for the finance remit (customs): The figures in these columns are the result of a summarized area-specific assessment in the customs administration.

Table b: Year of the latest complete update of the data basis on areas of activity especially vulnerable to corruption

Collecting or updating the data on areas of activity especially vulnerable to corruption

Remit and level of the authority	Number of authorities with the latest update in 2014 / number of staff in these authorities	Number of authorities with the latest update in 2013 and 2014 / number of staff in these authorities	Number of authorities with the latest update in the period between 2009 and 2011 / number of staff in these authorities	Number of authorities with the latest update in the period before 2009 / number of staff in these authorities
BMW Higher federal authorities	2 / 4,566	1 / 758	2 / 1,111	1 / 1,636
AA Not attributable to a certain level	-	-	1 / 324	-
BMI Higher federal authorities	1 / 4,951	4 / 5,464	3 / 7,263	3 / 3,053
BMI Lower-level federal authorities	-	11 / 33,110	-	-
BMI Not attributable to a certain level	-	2 / 512	2 / 73	-
BMJV Higher federal authorities	2 / 3,353	1 / 189	-	1 / 188
BMJV Not attributable to a certain level	2 / 501	-	-	1 / 219
BMF Higher federal authorities	2 / 4,308	1 / 2,234	-	-
BMF Not attributable to a certain level	5 / 9,887	1 / 250	1 / 575	-

Remit and level of the authority	Number of authorities with the latest update in 2014 / number of staff in these authorities	Number of authorities with the latest update in 2013 and 2014 / number of staff in these authorities	Number of authorities with the latest update in the period between 2009 and 2011 / number of staff in these authorities	Number of authorities with the latest update in the period before 2009 / number of staff in these authorities
BMF - Federal Customs Administration Higher federal authority	-	1 / 26	-	-
BMF - Federal Customs Administration Mid-level federal authorities	-	7 / 6,571	-	-
BMF - Federal Customs Administration Lower-level federal authorities	-	51 / 30,811	-	-
BMAS Higher federal authority	-	-	1 / 554	-
BMAS Not attributable to a certain level	2 / 1,220	-	1 / 163	1 / 22,680
BMEL Higher federal authorities	3 / 1,966	2 / 1,559	-	1 / 788
BMEL Not attributable to a certain level	1 / 1,076	1 / 770	-	-
BMVg Higher administration	5 / n.s.	7 / n.s.	1 / n.s.	1 / n.s.

Remit and level of the authority	Number of authorities with the latest update in 2014 / number of staff in these authorities	Number of authorities with the latest update in 2013 and 2014 / number of staff in these authorities	Number of authorities with the latest update in the period between 2009 and 2011 / number of staff in these authorities	Number of authorities with the latest update in the period before 2009 / number of staff in these authorities
BMVg Mid-level administration	64 / n.s.	20 / n.s.	12 / n.s.	13 / n.s.
BMVg Lower-level administration	228 / n.s.	62 / n.s.	50 / n.s.	13 / n.s.
BMFSFJ Higher federal authorities	1 / 1,116	1 / 20	-	-
BMG Higher federal authorities	1 / 1,079	3 / 1,413	1 / 771	-
BMVI Higher federal authorities	7 / 5,886	5 / 3,038	-	-
BMVI Mid-level federal authority	1 / 965	-	-	-
BMVI Lower-level federal authorities	46 / 11,434	-	-	-
BMVI Not attributable to a certain level	1 / 694	-	-	-
BMUB Higher federal authorities	1 / 1,449	2 / 1,972	1 / 316	-
BMUB Not attributable to a certain level	1 / 393	-	-	-

Remit and level of the authority	Number of authorities with the latest update in 2014 / number of staff in these authorities	Number of authorities with the latest update in 2013 and 2014 / number of staff in these authorities	Number of authorities with the latest update in the period between 2009 and 2011 / number of staff in these authorities	Number of authorities with the latest update in the period before 2009 / number of staff in these authorities
BMBF Not attributable to a certain level	-	-	-	1 / 650
BRH Higher federal authorities	-	7 / 52	-	-
BKM Higher federal authorities	2 / 1,669	-	1 / 630	-
BKM Not attributable to a certain level	4 / 908	6 / 247	1 / 2,003	1 / 59

Table c: Staff rotation in the executive agencies

Current data are available only for the remits and levels listed

Remit and level of the authority	Number of authorities for which relevant data are available / number of staff in these authorities	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 compensation measures were taken to reduce the risk	Reason for the failure to rotate (number of authorities having stated the respective reason)					
				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
BMW Higher federal authorities	6 / 8,071	899	899	5	6	2	1	3	1
AA Not attributable to a certain level	1 / 324	26	26	1	-	-	1	-	-
BMI Higher federal authorities	5 / 5,327	181	153	3	3	1	1	-	2

*) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.

Remit and level of the authority	Number of authorities for which relevant data are available / number of staff in these authorities	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 compensation measures were taken to reduce the risk	Reason for the failure to rotate (number of authorities having stated the respective reason) *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.					
				Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable replacement position at the same pay level	Other reasons
BMI Lower-level federal authorities	11 / 33,110	0	-	-	-	-	-	-	-
BMI Not attributable to a certain level	2 / 261	40	20	2	-	-	-	1	-
BMJV Higher federal authorities	2 / 377	32	23	-	1	-	-	2	1
BMJV Not attributable to a certain level	1 / 278	13	13	-	-	-	-	1	1

Remit and level of the authority	Number of authorities for which relevant data are available / number of staff in these authorities	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 compensation measures were taken to reduce the risk	Reason for the failure to rotate (number of authorities having stated the respective reason) *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.					
				Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable re- placement position at the same pay level	Other reasons
BMF Higher federal authorities	1 / 2,535	16	16	1	1	-	1	1	-
BMF Not attributable to a certain level	5 / 8,880	968	824	4	4	3	3	2	1
BMF - Federal Customs Administration Higher federal authority	1 / 26	2	2	1	1	-	-	-	-

Remit and level of the authority	Number of authorities for which relevant data are available / number of staff in these authorities	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 compensation measures were taken to reduce the risk	Reason for the failure to rotate (number of authorities having stated the respective reason) *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.					
				Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable replacement position at the same pay level	Other reasons
BMF - Federal Customs Administration Mid-level federal authorities	7 / 6,571	12	12	X*)	X	-	X	X	-
BMF - Federal Customs Administration Lower-level federal authorities	51 / 30,811	235	198	X*)	X	X	X	X	X
BMAS Not attributable to a certain level	2 / 863	136	136	1	2	1	-	1	1

Remit and level of the authority	Number of authorities for which relevant data are available / number of staff in these authorities	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 compensation measures were taken to reduce the risk	Reason for the failure to rotate (number of authorities having stated the respective reason) *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.					
				Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable re- placement position at the same pay level	Other reasons
BMEL Higher federal authorities	3 / 2,415	84	84	2	2	-	-	1	-
BMVg Higher administration	10 / n.s.	32	7	3	4	2	1	4	2
BMVg Mid-level administration	59 / n.s.	132	105	14	10	4	1	7	2
BMVg Lower-level administration	184 / n.s.	574	279	29	40	9	1	25	14
BMFSFJ Higher federal authorities	2 / 1,136	22	22	2	1	2	-	1	1

Remit and level of the authority	Number of authorities for which relevant data are available / number of staff in these authorities	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 compensation measures were taken to reduce the risk	Reason for the failure to rotate (number of authorities having stated the respective reason)					
				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 re- placement position at the same pay level	Other reasons
BMG Higher federal authorities	3 / 2,884	313	313	3	3	2	1	2	-
BMVI Higher federal authorities	5 / 4,166	431	278	5	5	2	1	4	-
BMVI Lower-level federal authorities	46 / 11,434	2,933	2,933	X	X	X	X	X	X
BMVI Not attributable to a certain level	1 / 694	27	27	1	1	1	-	1	-

Remit and level of the authority	Number of authorities for which relevant data are available / number of staff in these authorities	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 compensation measures were taken to reduce the risk	Reason for the failure to rotate (number of authorities having stated the respective reason) *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.					
				Specialists who cannot be rotated	Other staff with special skills/knowledge that are difficult to replace (ensuring continuity)	Staff retiring soon from active duty	Staff to be transferred soon to another organizational unit	Staff without a suitable replacement position at the same pay level	Other reasons
BMUB Higher federal authorities	2 / 1,111	304	304	2	1	1	-	1	1
BKM Higher federal authorities	1 / 1,659	19	0	-	-	-	-	-	1
BKM Not attributable to a certain level	10 / 3,144	154	75	8	8	2	-	5	1

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

Current data are available only for the remits and levels listed

Remit and level of the authority	Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruptions risks)	Intensifying administrative and task-related supervision	Other measures
Number of authorities having stated that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.						
BMW Higher federal authorities	6	2	4	1	6	1
AA Not attributable to a certain level	1	-	-	-	1	-
BMI Higher federal authorities	4	2	1	1	2	1
BMI Not attributable to a certain level	3	1	-	1	3	-
BMJV Higher federal authorities	1	-	-	-	1.	-

Remit and level of the authority	Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruptions risks)	Intensifying administrative and task-related supervision	Other measures
Number of authorities having stated that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.						
BMJV Not attributable to a certain level	1	-	-	-	1	-
BMF Higher federal authorities	1	-	-	-	1	-
BMF Not attributable to a certain level	5	2	1	1	4	4
BMF - Federal Customs Administration Higher federal authority	1	1	1	-	1	1
BMF - Federal Customs Administration Mid-level federal authorities	X*)	X	X	X	X	-

Remit and level of the authority	Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruptions risks)	Intensifying administrative and task-related supervision	Other measures
Number of authorities having stated that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.						
BMF - Federal Customs Administration Lower-level federal authorities	X*)	X	X	X	X	X
BMAS Not attributable to a certain level	2	1	1	1	2	-
BMEL Higher federal authorities	3	2	-	-	2	-
BMVg Higher administration	1	-	-	-	2	1
BMVg Mid-level administration	11	4	-	-	14	4
BMVg Lower-level administration	32	14	6	9	28	7

Remit and level of the authority	Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruptions risks)	Intensifying administrative and task-related supervision	Other measures
Number of authorities having stated that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.						
BMFSFJ Higher federal authorities	1	1	-	-	2	-
BMG Higher federal authorities	3	2	1	1	2	1
BMVI Higher federal authorities	4	3	2	-	2	-
BMVI Lower-level federal authorities	X*)	X	X	X	X	X
BMVI Not attributable to a certain level	1	1	-	1	1	-
BMUB Higher federal authorities	2	1	-	-	2	-

Remit and level of the authority	Extending the principle of greater scrutiny	Working in teams	Exchanging tasks within an organizational unit	Transferring responsibilities (with compensatory effect in terms of corruptions risks)	Intensifying administrative and task-related supervision	Other measures
<p align="center">Number of authorities having stated that they carry out these compensatory measures *) In terms of data collection, some authorities were treated as groups. "X" means: applies to the group.</p>						
BKM Not attributable to a certain level	7	4	-	-	6	-

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

Remit	The authority has special regulations ...			Authorities which exercise task-related supervision of other authorities	There are regulations on cooperation with the executive agencies / bodies ...			
	... on monitoring staff performance of duties (administrative supervision)	... on monitoring lawfulness and expedience (task-related supervision)	... that are applied especially in all or some fields of areas of activity especially vulnerable to corruption ^{*)}		... on how to deal with cases of suspected corruption	... according to which cases of suspected corruption must be reported	... according to which executive agencies / bodies must provide the supervisory authority with regular reports on the implementation of the directive on corruption prevention	... according to which other measures of administrative and task-related supervision are carried out
Number of authorities								
BMWi	4	3	4	0	n/a			
AA	0	1	1	0	n/a			
BMI	19	21	6	1	1	1	1	1
BMJV	4	4	6	0	n/a			
BMF	6	6	9	0	n/a			
BMF - customs administration	59	59	58	X (reported cumulatively for all bodies exercising task-related supervision)	X	X	X	X
BMAS	7	7	7	1	0	0	0	0
BMEL	5	5	5	0	n/a			

Remit	The authority has special regulations ...			Authorities which exercise task-related supervision of other authorities	There are regulations on cooperation with the executive agencies / bodies ...			
	... on monitoring staff performance of duties (administrative supervision)	... on monitoring lawfulness and expedience (task-related supervision)	... that are applied especially in all or some fields of areas of activity especially vulnerable to corruption ^{*)}		... on how to deal with cases of suspected corruption	... according to which cases of suspected corruption must be reported	... according to which executive agencies / bodies must provide the supervisory authority with regular reports on the implementation of the directive on corruption prevention	... according to which other measures of administrative and task-related supervision are carried out
Number of authorities								
BMVg	381	361	103	196	168	170	76	116
BMFSFJ	1	1	0	0	n/a			
BMG	2	2	4	0	n/a			
BMVI	55	55	55	3	2	2	2	3
BMUB	2	3	2	2	1	1	0	0
BMBF	1	1	1	0	n/a			
BRH	0	0	7	0	n/a			
BKM	5	4	2	0	n/a			

Table f: Principle of greater scrutiny and transparency

Remit	The following measures are 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 are used ... (Please note: Some authorities have other authorities assume all of these tasks; the delegating authority was not counted in these cases, even if the delegated authority uses IT-assisted workflows.)						
	Second staff member checking work results	Plausibility checks	IT-assisted workflows	.. for procurement measures	.. to award funds (institutional funding; project funding)	.. to settle benefit claims pursuant to civil service law	.. to settle travel expenses	.. for other measures with budgetary or other financial impact	.. to enact other administrative acts or administrative decisions relevant to the public	.. other processes
Number of authorities										
BMW	5	6	6	5	1	1	5	4	3	0
AA	1	0	0	0	0	0	0	0	0	0
BMI	25	22	24	22	3	13	17	22	14	15
BMJV	6	7	5	3	0	0	3	2	3	0
BMF	13	13	9	5	0	4	4	3	1	7
BMF - customs administration	59	59	58	59	0	7	7	58	58	58
BMAS	7	7	7	4	1	2	4	5	4	1
BMEL	8	7	7	4	1	0	4	3	0	4
BMVg	413	422	328	267	29	29	172	275	27	119
BMFSFJ	2	2	1	1	1	0	0	0	0	0
BMG	5	4	4	3	1	0	2	3	1	2
BMVI	60	62	62	58	1	1	62	53	4	4

Remit	The following measures are 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 are used ... (Please note: Some authorities have other authorities assume all of these tasks; the delegating authority was not counted in these cases, even if the delegated authority uses IT-assisted workflows.)						
	Second staff member checking work results	Plausibility checks	IT-assisted workflows	... for procurement measures	... to award funds (institutional funding; project funding)	... to settle benefit claims pursuant to civil service law	... to settle travel expenses	... for other measures with budgetary or other financial impact	... to enact other administrative acts or administrative decisions relevant to the public	... other processes
Number of authorities										
BMUB	5	4	5	5	4	0	4	2	2	1
BMBF	1	1	1	1	1	0	0	1	0	1
BRH	0	7	7	7	0	0	0	7	0	0
BKM	15	13	5	2	0	1	3	3	1	2

Table g: Contact person for corruption prevention

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "jour fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BMW Higher federal authorities	6 / 8,071	0 / 0	0 / 0	3	0	3	0	4	2
AA Not attributable to a certain level	1 / 324	0 / 0	0 / 0	0	0	1	0	0	1
BMI Higher federal authorities	11 / 20,731	0 / 0	0 / 0	5	0	5	2	5	3
BMI Lower-level federal authorities	11 / 33,110	0 / 0	0 / 0	11	0	0	0	11	0

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "four fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BMI Not attributable to a certain level	2 / 512	2 / 73	0 / 0	1	0	0	1	0	0
BMJV Higher federal authorities	4 / 3,730	0 / 0	0 / 0	1	0	1	0	1	1
BMJV Not attributable to a certain level	3 / 720	0 / 0	0 / 0	1	1	0	0	1	0
BMF Higher federal authorities	4 / 6,542	0 / 0	0 / 0	4	0	0	2	2	0

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "four fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BMF Not attributable to a certain level	9 / 11,034	0 / 0	0 / 0	3	0	4	3	4	0
BMF - Federal Customs Administration Higher federal authority	1 / 26	0 / 0	0 / 0	1	0	0	1	0	0
BMF - Federal Customs Administration Mid-level federal authorities	7 / 6,571	0 / 0	0 / 0	7	0	0	7	0	0

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "four fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BMF - Federal Customs Administration Lower-level federal authorities	51 / 30,811	0 / 0	0 / 0	51	0	0	51	0	0
BMAS Higher federal authority	1 / 554	0 / 0	0 / 0	0	1	0	0	0	0
BMAS Not attributable to a certain level	7 / 139,720	0 / 0	0 / 0	3	1	3	1	3	2
BMEL Higher federal authorities	6 / 4,313	0 / 0	0 / 0	3	0	2	0	2	3

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "four fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BMEL Not attributable to a certain level	3 / 2,047	0 / 0	0 / 0	0	0	2	0	1	1
BMVg Higher administration	19 / n.s.	0 / 0	1 / n.s.	13	2	2	6	7	1
BMVg Mid-level administration	122 / n.s.	17 / n.s.	6 / n.s.122	75	10	26	42	34	25
BMVg Lower-level administration	273 / n.s.	266 / n.s.	40 / n.s.	211	37	30	100	78	59
BMFSFJ Higher federal authorities	1 / 1,116	1 / 20	0 / 0	0	0	0	0	0	0

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "four fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BMG Higher federal authorities	5 / 3,263	0 / 0	0 / 0	2	3	0	1	1	0
BMVI Higher federal authorities	13 / 9,114	1 / 161	0 / 0	3	0	9	2	8	2
BMVI Mid-level federal authority	1 / 965	0 / 0	0 / 0	0	0	1	0	1	0
BMVI Lower-level federal authorities	0 / 0	46 / 11,434	0 / 0	n/a					
BMVI Not attributable to a certain level	1 / 694	0 / 0	0 / 0	1	0	0	0	1	0

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "four fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BMUB Higher federal authorities	4 / 3,737	0 / 0	0 / 0	2	0	2	1	2	1
BMUB Not attributable to a certain level	1 / 393	0 / 0	1 / 5	0	0	1	1	0	0
BMBF Not attributable to a certain level	1 / 650	0 / 0	0 / 0	1	0	0	1	0	0
BRH Higher federal authorities	0 / 0	7 / 52	0 / 0	n/a					
BKM Higher federal authorities	3 / 2,299	0 / 0	0 / 0	2	0	1	2	0	1

Remit and level of the authority	Number of authorities that had their own contact person / number of staff in these authorities If a contact person has been allocated to a group of authorities, it is covered by this section.	Number of authorities where the contact person is affiliated to another authority / number of staff in these authorities	Number of authorities that did not have their own contact person / number of staff in these authorities	Reason for contacts between the contact person for corruption prevention and the authority's executive level (number of contact persons)			Frequency of regular contacts between the contact person and the authority's executive level (number of contact persons)		
				No specific reason (e.g. within the context of a "four fixe", or as a general report or exchange on corruption prevention).	Specific reason (e.g. a case of suspected corruption).	Both	Once a month or more often	Less than once a month, but at least once every six	Less than once every six months, but at least once a year
BKM Not attributable to a certain level	14 / 3,617	0 / 0	0 / 0	9	1	1	2	5	3

Table h: Corruption-awareness training and workshops

Name of the supreme federal authority	Corruption-awareness measures, including workshops, conducted in the <u>2014 calendar year</u>			Corruption-awareness measures applied (other than workshops)							Workshops offered in the 2014 calendar year (number of trained staff)
	Number of staff who received corruption-awareness training in 2014	Number of staff who work in areas of activity especially vulnerable to corruption and received anti-corruption training in 2014 (if statistics are available)	Number of supervisory staff who received corruption-awareness training in 2014	Discussion with superiors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Discussion with the department/division responsible for new employees	Corruption-awareness measures – no workshops – taken during employee events (such as orientation for new employees)	IT-assisted offerings (no workshops)	Handing out information material (instead of simply displaying it)	
BMWi Higher federal authorities	4,622	1,023	151	3	4	3	2	3	2	3	77
AA Not attributable to a certain level	324	46	40	0	0	0	0	0	1	0	22
BMI Higher federal authorities	6,874	1,094	348	5	9	3	6	6	7	3	578
BMI Lower-level federal authorities *)	10,104	1,027	1,630		X	X	X	X	X	X	X
BMI Not attributable to a certain level	60	35	13	2	1	2	1	0	0	1	2

*) Data provided for a group of authorities

Name of the supreme federal authority *): Data provided for a group of authorities	Corruption-awareness measures, including workshops, conducted in the <u>2014 calendar year</u>			Corruption-awareness measures applied (other than workshops) Number of authorities							Workshops offered in the 2014 calendar year (number of trained staff)
	Number of staff who received corruption-awareness training in 2014	Number of staff who work in areas of activity especially vulnerable to corruption and received anti-corruption training in 2014 (if statistics are available)	Number of supervisory staff who received corruption-awareness training in 2014	Discussion with superiors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Discussion with the department/division responsible for new employees	Corruption-awareness measures – no workshops – taken during employee events (such as orientation for new employees)	IT-assisted offerings (no workshops)	Handing out information material (instead of simply displaying it)	
BMJV Higher federal authorities	884	236	92	2	2	1	1	0	1	1	884
BMJV Not attributable to a certain level	289	21	16	1	1	0	1	1	1	1	1
BMF Higher federal authorities	4,592	2,161	162	2	3	1	2	0	2	4	118
BMF Not attributable to a certain level	2,910	948	241	5	6	0	5	3	4	1	567
BMF - Federal Customs Administration Higher federal authority	20	2	0	0	1	0	0	0	0	0	0

Name of the supreme federal authority	Corruption-awareness measures, including workshops, conducted in the <u>2014 calendar year</u>			Corruption-awareness measures applied (other than workshops)							Workshops offered in the 2014 calendar year (number of trained staff)	
	Number of staff who received corruption-awareness training in 2014	Number of staff who work in areas of activity especially vulnerable to corruption and received anti-corruption training in 2014 (if statistics are available)	Number of supervisory staff who received corruption-awareness training in 2014	Discussion with superiors	Discussion with contact person for corruption prevention	Discussion with HR and organizational matters	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – no workshops – taken during employee events (such as orientation for new employees)	IT-assisted offerings (no workshops)	Handing out information material (instead of simply displaying it)		Other measures
BMF - Federal Customs Administration Mid-level federal authorities *)	645	67	54	X	X	X	X	X	X	X	X	60
BMF - Federal Customs Administration Lower-level federal authorities *)	4,134	228	327	X	X	X	X	X	X	X	X	453
BMAS Higher federal authority	533	366	53	1	1	1	0	0	1	0	1	
BMAS Not attributable to a certain level	4,707 See comment below	2,420	1,284	6	6	3	3	2	2	3	1,546	
BMEL Higher federal authorities	1,949	285	219	1	3	0	2	0	1	2	1	

*) Data provided for a group of authorities

Name of the supreme federal authority *): Data provided for a group of authorities	Corruption-awareness measures, including workshops, conducted in the <u>2014 calendar year</u>			Corruption-awareness measures applied (other than workshops) Number of authorities							Workshops offered in the 2014 calendar year (number of trained staff)
	Number of staff who received corruption-awareness training in 2014	Number of staff who work in areas of activity especially vulnerable to corruption and received anti-corruption training in 2014 (if statistics are available)	Number of supervisory staff who received corruption-awareness training in 2014	Discussion with superiors	Discussion with contact person for corruption prevention	Discussion with the department/division responsible for HR and organizational matters	Discussion with the department/division responsible for new employees	Corruption-awareness measures – no workshops – taken during employee events (such as orientation for new employees)	IT-assisted offerings (no workshops)	Handing out information material (instead of simply displaying it)	
BMEL Not attributable to a certain level	170	40	22	0	3	0	1	0	2	0	40
BMVg Higher administration	17,614	1,715	841	9	13	6	7	5	9	9	71
BMVg Mid-level administration	52,578	527	2,866	57	65	16	38	33	36	31	1,259
BMVg Lower-level administration	73,280	1,646	3,102	98	125	20	98	62	184	182	3,778
BMFSFJ Higher federal authorities	203	83	17	2	0	0	2	1	1	1	48
BMG Higher federal authorities	2,071	793	229	4	5	2	3	4	5	2	113

Name of the supreme federal authority *): Data provided for a group of authorities	Corruption-awareness measures, including workshops, conducted in the <u>2014 calendar year</u>			Corruption-awareness measures applied (other than workshops) Number of authorities							Workshops offered in the 2014 calendar year (number of trained staff)
	Number of staff who received corruption-awareness training in 2014	Number of staff who work in areas of activity especially vulnerable to corruption and received anti-corruption training in 2014 (if statistics are available)	Number of supervisory staff who received corruption-awareness training in 2014	Discussion with superiors	Discussion with contact person for corruption prevention	Discussion with HR and organizational matters	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – no workshops – taken during employee events (such as orientation for new employees)	IT-assisted offerings (no workshops)	Handing out information material (instead of simply displaying it)	
BMVI Higher federal authorities	9,275	3,422	598	10	13	6	9	10	14	2	2,437
BMVI Mid-level federal authority	965	465	55	1	1	1	1	1	1	1	516
BMVI Lower-level federal authorities *)	11,434	3,367	426	X	X	X	X	X	X	X	3,621
BMVI Not attributable to a certain level	694	43	82	1	1	0	1	1	0	0	42
BMUB Higher federal authorities	250	58	39	3	4	2	4	5	2	0	155

Name of the supreme federal authority *): Data provided for a group of authorities	Corruption-awareness measures, including workshops, conducted in the <u>2014 calendar year</u>			Corruption-awareness measures applied (other than workshops) Number of authorities							Workshops offered in the 2014 calendar year (number of trained staff)
	Number of staff who received corruption-awareness training in 2014	Number of staff who work in areas of activity especially vulnerable to corruption and received anti-corruption training in 2014 (if statistics are available)	Number of supervisory staff who received corruption-awareness training in 2014	Discussion with superiors	Discussion with contact person for corruption prevention	Discussion with HR and organizational matters	Discussion with the department/division responsible for HR and organizational matters	Corruption-awareness measures – no workshops – taken during employee events (such as orientation for new employees)	IT-assisted offerings (no workshops)	Handing out information material (instead of simply displaying it)	
BMUB Not attributable to a certain level	25	25	10	0	0	0	1	0	0	0	25
BMBF Not attributable to a certain level	100	n.s.	8	1	1	1	1	1	0	0	22
BRH Higher federal authorities *)	0	-	0	0	0	0	0	0	0	0	0
BKM Higher federal authorities	459	20	44	2	1	1	3	1	0	1	89
BKM Not attributable to a certain level	337	26	83	4	4	2	3	0	1	2	3

Comments on the data for the labour remit: Regarding corruption-awareness training for staff of the German Federal Pension Insurance, please note that regular discussions take place in the individual areas of activity and that corruption prevention is addressed at regular intervals in the areas of activity espe-

cially vulnerable to corruption. Given the number of staff in the areas of activity of the German Federal Pension Insurance, it is not possible to regularly document the contents of the briefings and the number of staff present. The number of staff who have received corruption-awareness training was identified on the basis of the measures taken in certain areas. However, the actual number is likely to be much higher.