



Federal Ministry
of the Interior, Building
and Community

Prevention of Corruption in the Federal Administration

Annual Report for 2019

As at: 4 December 2020

Table of contents

List of abbreviations	A
List of figures.....	A
Overview	B
1. Introduction	1
1.1. Annual report	1
1.2. Scope.....	1
1.3. Data basis	2
2. Prevention of corruption in the federal administration	3
2.1. Areas of activity especially vulnerable to corruption	3
2.2. Length of assignment in AEVC.....	4
2.3. Compensatory measures designed to reduce risks.....	5
2.4. Administrative and task-related supervision.....	5
2.5. Principle of greater scrutiny.....	8
2.6. Contact person for corruption prevention.....	10
2.7. Corruption awareness measures, instruction and training.....	11
2.8. Good practices	13
3. Cases of suspected corruption.....	15
3.1. Cases in the reporting year.....	15
3.2. Terminology and procedure.....	15
3.3. New cases.....	17
3.4. Concluded cases	21
4. Prevention of corruption in the international context.....	25
5. Outlook	26
Annex.....	- 1 -
Annex A – Data basis	- 1 -
Annex B – Implementation of the Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration (Directive) in the supreme federal authorities .-	17
-	

Table of contents

Annex C – Implementation of Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration (Directive) in the agencies within the remits of the supreme federal authorities - 36 -

List of abbreviations¹

AEVC	area of activity especially vulnerable to corruption
CPCP	contact person for corruption prevention
FAQs	frequently asked questions
G20	Group of 20
GRECO	Group of States against Corruption
IT	information technology
OECD	Organisation for Economic Cooperation and Development
UN	United Nations
UNCAC	United Nations Convention against Corruption

List of figures

- Icons supplied by [Iconmonstr](#).

¹ The abbreviations and full names of the supreme federal authorities and agencies within their remits are listed in Tables [1](#), [2](#) and [4](#) in [Annex A](#).

Overview



This report covers 531,539 employees in 23 supreme federal authorities and 927 agencies within their remits.

The number of areas of activity especially vulnerable to corruption (AEVC) is known in all the supreme federal authorities. Reliable data on AEVC were available in 78 per cent of the agencies within their remits. In the reporting year, 12,837 employees (36 per cent) in the supreme federal authorities and 49,826 employees (10 per cent) in the agencies within their remits were working in AEVC. Eight per cent of employees in the supreme federal authorities and 26 per cent of employees in the agencies within their remits have been working in AEVC for more than five years.



All the supreme federal authorities have their own contact person for corruption prevention. Almost all of the agencies within their remits (94 per cent) have a contact person for corruption prevention. A total of 1,190 employees in the federal administration perform the tasks of a contact person for corruption prevention.

In 2019, a total of 261,899 employees (49 per cent) in the federal administration took part in corruption awareness measures, were given instruction or underwent training for the first or repeat time. These measures are repeated regularly for employees in AEVC in 15 of the supreme federal authorities (65 per cent) and in 774 of the agencies within their remits (83 per cent). Corruption prevention measures are repeated regularly for all other employees in 14 of the supreme federal authorities (61 per cent) and in 822 of the agencies within their remits (89 per cent). In the reporting year, a total of 17,535 (three per cent) of employees in the federal administration took part in corruption prevention training which went beyond mere awareness-raising.



In the reporting year new preliminary investigations were launched against 25 employees in the federal administration based on a suspicion of corruption, of typical related offences (e.g. fraud or embezzlement) or of a corruption-related disciplinary offence. This means that new corruption charges were brought against 0.0047 per cent of the employees in the federal administration.

A total of seven cases of suspected corruption first reported in previous reporting years were concluded by final decision in 2019, including five preliminary criminal investigations and four disciplinary proceedings. Sanctions were imposed against the suspect(s) in 13 per cent of the cases of suspected corruption.



1. Introduction

1.1. Annual report

The Prevention of Corruption in the Federal Administration Annual Report is one of the federal administration's strategic integrity management tools. Corruption prevention is essential to a fully functional, efficient and rule-of-law-based administration which citizens can trust. By presenting practical corruption prevention measures and cases of suspected corruption, the Federal Government gives an account vis-à-vis the German Bundestag of the situation as regards implementation of the Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration of 30 July 2004 (Directive). Based on several resolutions adopted by the Bundestag's Auditing Committee, the Federal Ministry of the Interior, Building and Community (BMI) is required to submit to the Committee an annual report detailing the trends in and results of corruption prevention in the federal administration. After the Committee has consulted on the annual report it is published on the BMI's website.²

This Annual Report is divided into five chapters. The introduction in Chapter 1 explains the scope and data basis and provides an overview of the situation as regards implementation of corruption prevention and of cases of suspected

corruption in the federal administration. Chapter 2 places corruption prevention within the international context. Chapter 3 addresses the level of implementation of the Directive. Chapter 4 describes those cases of suspected corruption which were newly reported in 2019 as well as cases which were concluded by final decision in the reporting year. Chapter 5 then provides a brief summary and an outlook on future reporting.

1.2. Scope

According to no. 1.1 of the Directive, its regulations apply to the supreme federal authorities, the authorities of the direct and indirect federal administration (i.e. legal bodies, institutions and foundations directly under federal control established to carry out specific federal tasks), the federal courts, special federal assets and the federal armed forces. The Directive applies analogously to legal persons under private law in which the Federal Republic of Germany has a 100% stake.³

For reasons of simplicity, the expression "agencies within the remit of a supreme federal authority" as used in this report also refers to foundations and legal persons under private law.⁴

² The German versions of all the annual reports as of the reporting year 2013 are available on the BMI's website (see the section [Korruptionsprävention](#)); the English versions of all the annual reports as of the reporting year 2014 are available on the BMI's website (see the section [Corruption prevention](#)) (last accessed: 4 Nov. 2020).

³ See the [Report on Federal Holdings 2019](#), which is available (in German only) on the Federal Ministry of Finance's website (last accessed: 4 Nov. 2020).

⁴ These legal persons under private law (limited liability companies (GmbH), stock corporations (AG)) are companies which are wholly owned by the Federation. Under Article 83 et seqq. of the Basic Law (*Grundgesetz*, GG), they are neither under the direct nor indirect control of the federal administration. The Federation thus exercises no wide-ranging legal and task-related supervision over these associated companies' operative business.

The term “employee” refers to civil servants, public employees in the federal administration, soldiers and external staff (esp. local staff), as well as to other public service employees.

1.3. Data basis

This Annual Report covers the calendar year 2019. The cut-off date for data collection was 31 December 2019. Interdepartmental data gathering, validation and analysis was for the first time done using a customised web- and database-based specialist application. The digitisation of the questionnaires on corruption prevention and on cases of suspected corruption afforded the opportunity to also revise their content. The structure and content of the report was adapted accordingly.

The data on and subject matters regarding corruption prevention and cases of suspected corruption are based on information provided by the supreme federal authorities and the agencies within their remits in their responses to the questionnaires used to prepare this report. The supreme federal authorities confirmed that all the agencies within their remit participated.

The federal administration encompasses a total of 24 supreme federal authorities and 937 agencies within their remits. The present report includes and analyses data from 23 supreme federal authorities and 927 agencies. One supreme federal authority and 11 agencies did not form part of the data collection and analysis on account of their rights of self-administration, own compliance systems or due to matters of

secrecy. The reasons for their not participating are set out in the Annex.⁵

Data relating to some of the agencies are presented in summary form because the relevant information is kept centrally or because corruption prevention is centrally organised. Those agencies which provided cumulative data are listed separately in the Annex in the basic data relating to the supreme federal authorities.

⁵ See [Annex C Table 4](#).

2. Prevention of corruption in the federal administration

2.1. Areas of activity especially vulnerable to corruption

No. 2 of the Directive: 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 organisation, procedures and/or personnel assignments.

Measures to prevent corruption in the federal administration are designed following the identification and analysis of areas of activity especially vulnerable to corruption (AEVC).

The Recommendations on Preventing Corruption in the Federal Administration⁶ (Recommendations) serve to help interpret and explain the Directive. They define the term “areas of activity especially vulnerable to corruption” and set out the procedure for identifying and analysing those AEVC (risk analysis) in more detail. The Handout on Identifying Areas of Activity Especially Vulnerable to Corruption of 4 January 2012 provides additional detailed information.

⁶ The [Recommendations on Preventing Corruption in the Federal Administration](#) are available on the BMI’s website (last accessed: 4 Nov. 2020).

The situation as regards the identification of AEVC and the results of the risk analyses is described in the following – in [2.1.1.](#) for the supreme federal authorities and in [2.1.2.](#) for the agencies within their remits.

2.1.1. AEVC in the supreme federal authorities⁷

In total, 36 per cent of employees in the supreme federal authorities (12,837 employees) were working in AEVC in the reporting year. The process of recording and identifying AEVC was fully completed at least once by all the supreme federal authorities. In the case of 16 supreme federal authorities the identification process was last fully completed in the past five calendar years; two supreme federal authorities partially completed the identification process. Five supreme federal authorities carried out this procedure more than five years ago. When asked to state when the list of AEVC will next be updated, 15 supreme federal authorities responded “in the current or in the next calendar year”, five stated “in 3–5 years” and three reported that they were currently not planning an update. In 13 of the supreme federal authorities the identification of AEVC also encompassed the management level, in five cases including the agency management and in 12 the management level below the agency management. Risk analyses were conducted for 90 per cent of the AEVC in the supreme federal authorities.

2.1.2. AEVC in the agencies within the remits of the supreme federal authorities⁸

A total of 10 per cent of employees in the agencies within the remits of the supreme

⁷ See [Annex B](#) Table 2 and Table 3.

⁸ See [Annex C](#) Table 2 and Table 3.

federal authorities (49,826 employees) were working in AEVC in the reporting year. Reliable data on AEVC are available for 72 per cent of the agencies (670 agencies). In total, 57 per cent of the agencies (530 agencies) fully completed the process of identifying AEVC in the past five years, seven per cent (66 agencies) partially completed the process in the past five years. Eight per cent (74 agencies) stated that they last identified AEVC more than five years ago. A total of 42 per cent (390 agencies) are planning their next update or initial identification of AEVC in the current year (the year following the reporting year); 19 per cent (179 agencies) are planning to do so in the next calendar year. Thirty-nine per cent (358 agencies) stated that they were currently not planning an update or initial identification. A total of 572 agencies reported that the management level was included when AEVC were identified; 340 stated that the agency management was included, 507 that the management level below the agency management was included. Risk analyses were conducted for 82 per cent of the AEVC in the agencies within the remits of supreme federal authorities.

2.2. Length of assignment in AEVC

No. 4 of the Directive: Personnel

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

⁹ See [Annex B](#) Table 4.

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.

Limiting the length of an employee's assignment in an AEVC can help to prevent corrupt networks forming and to bring cases of corruption to light. Length of assignment in an AEVC is addressed in the following – in [2.2.1.](#) for the supreme federal authorities and in [2.2.2.](#) for the agencies within their remits.

2.2.1. Length of assignment in AEVC in the supreme federal authorities⁹

In 14 of the supreme federal authorities (61 per cent) sufficient data were available to be able to state how many employees had, in the reporting period, already been working in the same/similar AEVC for more than five years. These data showed that 1,007 employees (eight per cent) had been entrusted with the same/similar tasks in an AEVC for more than five years.

2.2.2. Length of assignment in AEVC in the agencies¹⁰

In 511 of the agencies within the supreme federal authorities' remits (55 per cent) sufficient data were available to be able to state how many employees had, in the reporting period, already been working in the same/similar AEVC for more than five years. These data showed that 12,707 employees (26 per cent) had been entrusted with

¹⁰ See [Annex C](#) Table 4.

the same/similar tasks in an AEVC for more than five years.

2.3. Compensatory measures designed to reduce risks

Where, by way of exception, staff or job rotation is not possible, or not within the recommended timeframe, the relevant reasons must be placed on record and compensatory measures designed to reduce the associated risks must be taken. Compensatory measures include introducing teamwork, using administrative and task-related supervision tools and ensuring that the principle of greater scrutiny is applied. For the purposes of this report, the situation as regards the implementation of administrative and task-related supervision tools and ensuring the application of the principle of greater scrutiny were investigated in the supreme federal authorities and the agencies within their remits. The results of the survey of the use of administrative and task-related supervision tools are presented in [2.3.1](#). The results of the survey of the application of the principle of greater scrutiny are presented in [2.3.2](#).

2.3.1. Compensatory measures designed to reduce risks in the supreme federal authorities

Suitable, effective and documented compensatory measures designed to reduce the risk of corruption were taken in regard to 74 per cent of employees (749 employees) who had been working in the same/similar AEVC for more than five years.

2.3.2. Compensatory measures designed to reduce risks in the agencies within the remits of the supreme federal authorities

Suitable, effective and documented compensatory measures designed to reduce the risks arising from the failure to carry out staff or job rotation were taken in regard to 71 per cent of employees (9,064 employees) who had been working in the same/similar AEVC for more than five years.

2.4. Administrative and task-related supervision

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.

Conscientious administrative and task-related supervision is an important corruption prevention tool.

Administrative and task-related supervision is investigated as part of corruption prevention:

- On the one hand, administrative and task-related supervision is seen as an active, forward-looking personnel management tool and a tool for controlling supervisors in their

relationship with staff within a supreme federal authority or an agency within its remit.

- On the other hand, administrative and task-related supervision is investigated because it is a key element when it comes to managing and controlling the federal administration in its relationship with the individual agencies within a particular remit and between the individual agencies within a particular remit.

When it comes to recording which tools the supreme federal authorities and the agencies within their remits apply, the questionnaire sent out for the current reporting year, i.e. 2019, applied a newly developed, five-stage model. The higher the stage, the more comprehensive and intensive the administrative and task-related supervisory measures. The five stages are as follows:

- **Stage 1** forms the basis and encompasses general provisions on administrative and task-related supervision (e.g. the Directive).
- **Stage 2** encompasses Stage 1 and further-going internal written rules, for example those set out in internal regulations (guidelines, codes of conduct).
- **Stage 3** incorporates Stages 1 and 2, and also includes, at least in regard to some of an agency's areas of activity, an internal control system which is documented in writing as well as a

documented analysis of the frequency and subject-matter of the controls done.

- **Stage 4** includes, in addition to Stages 1 to 3, a comprehensive internal control system which is documented in writing as well as a documented analysis of the frequency and subject-matter of the controls done.
- **Stage 5** encompasses either Stage 3 or Stage 4 as well as audits conducted by an internal audit unit.

The following was investigated to assess the situation as regards management and control in the federal administration:

- Whether a supreme federal authority or an agency performs administrative and task-related supervisory tasks vis-à-vis other agencies;
- Whether there is regular information-sharing on corruption prevention with subordinate agencies; and
- Whether rules on cooperation in the handling of cases of suspected corruption are in place.

The tools which the supreme federal authorities use as part of administrative and task-related supervision are presented in [2.4.1](#). The tools of administrative and task-related supervision used by the agencies within the remits of the supreme federal authorities are described in [2.4.2](#).

2.4.1. Administrative and task-related supervision in the supreme federal authorities¹¹

All the supreme federal authorities use administrative and task-related supervisory tools. In three cases (13 per cent) these can be categorised as Stage 1, in 10 cases (43 per cent) Stage 2, in three cases (13 per cent) Stage 3 and seven (30 per cent) can be categorised as Stage 5.

A total of 19 of the supreme federal authorities (83 per cent) stated that they have an internal audit unit. One supreme federal authority responded that it did not have its own internal audit unit, but that it had the audit done on behalf of the Federal Administrative Office. Three of the supreme federal authorities have no internal audit unit.

A total of 16 of the 23 supreme federal authorities (70 per cent) have agencies within their remit. Thirteen of the supreme federal authorities (57 per cent) carry out administrative and task-related supervisory tasks (excl. cases of exclusively legal supervision) vis-à-vis other agencies. Of these, 11 (69 per cent) reported that they regularly shared information on corruption prevention with their subordinate agencies; another nine (56 per cent) reported that they have introduced rules on cooperation with their subordinate agencies when it comes to handling cases of suspected corruption.

2.4.2. Administrative and task-related supervision in the agencies within the remits of the supreme federal authorities¹²

All the agencies within the remits of the supreme federal authorities use individual administrative

and task-related supervisory tools. In 586 cases (63 per cent) these can be categorised as Stage 1, in 181 cases (20 per cent) Stage 2, in 46 cases (five per cent) Stage 3, in nine cases (one per cent) as Stage 4 and in 105 cases (11 per cent) as Stage 5.

Of the 927 agencies, 140 (15 per cent) have their own internal audit unit; in 714 of the agencies (77 per cent) the internal audit is conducted by other (co-)responsible agencies. Owing to the Federal Ministry of Defence's extensive remit, specific reference must be made to the Ministry's Audit Division. Given the management's overall responsibility for all tasks within this government department, the Ministry of Defence's Audit Division directly controls all the auditing tasks within the Ministry's remit. That is why the Ministry of Defence's Audit Division exercises direct administrative and task-related supervision over the Bundeswehr's Auditing Unit in the Federal Office for Bundeswehr Infrastructure, Environmental Protection and Services (RevBw) and over the Auditing Unit in the Federal Armed Forces Counterintelligence Office (RevBAMAD). There is no internal audit unit which is responsible for the remaining 54 agencies (five per cent).

There are 238 agencies (26 per cent) which exercise administrative and task-related supervision (excl. cases of exclusively legal supervision) over other agencies. Eighty-five agencies (nine per cent) regularly share information on corruption prevention with their subordinate agencies; 192 (21 per cent) have introduced rules on cooperation in the handling

¹¹ See [Annex B](#) Table [5](#) and Table [6](#).

¹² See [Annex C](#) Table [5](#) and Table [6](#).

of cases of suspected corruption in the subordinate agencies.

2.5. Principle of greater scrutiny

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 organisational 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).

With a view to reducing malpractice and mistakes, the Directive provides that important decisions must not be taken by individual employees on their own.

Application of the principle of greater scrutiny is in particular ensured by having rules on co-signing which require that a second staff member checks work results (see, for details, the recommendations¹³ concerning no. 3 of the Directive). The principle of greater scrutiny also requires that additional staff members check and

monitor work results (plausibility check). IT-supported workflows are also gaining increasing importance when it comes to ensuring that the principle of greater scrutiny is applied, for example in regard to the following:

- Procurement measures,
- Allocation of funds (institutional funding, project funding),
- Clearing allowances under civil service law,
- Personnel measures,
- Clearing travel expenses,
- Other measures with a budgetary or other financial effect, and
- Issuing other administrative acts or authority-specific decisions with an external effect (e.g. issuing of visas).

The measures which the supreme federal authorities employ to ensure that the principle of greater scrutiny is applied are presented in [2.5.1](#). The measures which are applied in the agencies within their remits are explained in [2.5.2](#).

2.5.1. The principle of greater scrutiny in the supreme federal authorities¹⁴

All the supreme federal authorities have measures in place to ensure that the principle of greater scrutiny is applied. Almost all of them require that a second staff member checks work results and, with the exception of the Federal Commissioner for Data Protection and Freedom of Information (BfDI), all the supreme federal authorities do plausibility checks. Nineteen of the supreme federal authorities (83 per cent) use

¹³ The [Recommendations on Preventing Corruption in the Federal Administration](#) are available on the BMI's website (last accessed: 4 Nov. 2020).

¹⁴ See [Annex B](#) Table [7](#) and Table [8](#).

IT-supported workflows to ensure that the principle of greater scrutiny is applied. Of these supreme federal authorities,

- 14 (74 per cent) use IT-supported workflows in regard to procurement measures,
- six (32 per cent) use them in regard to the allocation of funds (institutional funding, project funding),
- five (26 per cent) in regard to the clearing of allowances under civil service law,
- eight (42 per cent) in regard to personnel measures,
- 14 (74 per cent) in regard to the clearing of travel expenses,
- 14 (74 per cent) in regard to other measures with a budgetary or other financial effect,
- four (21 per cent) in regard to the issuing of other administrative acts or authority-specific decisions with an external effect (e.g. issuing of visas), and
- six (32 per cent) in regard to other procedures, such as clearing expenses allowances, approving applications for time off or memos to the agency management.

2.5.2. The principle of greater scrutiny in the agencies within the remits of the supreme federal authorities¹⁵

Almost all the agencies within the remits of the supreme federal authorities (89 per cent) have measures in place to ensure that the principle of greater scrutiny is applied. A total of 77 per cent

have a second staff member check work results and 72 per cent do plausibility checks. A total of 702 of the agencies (76 per cent) use IT-supported workflows to ensure the principle of greater scrutiny is applied. Of these agencies,

- 500 (71 per cent) use IT-supported workflows in regard to procurement measures,
- 93 (13 per cent) use them in regard to the allocation of funds (institutional funding, project funding),
- 49 (seven per cent) in regard to the clearing of allowances under civil service law,
- 257 (37 per cent) in regard to personnel measures,
- 527 (75 per cent) in regard to the clearing of travel expenses,
- 479 (68 per cent) in regard to other measures with a budgetary or other financial effect,
- 115 (16 per cent) in regard to the issuing of other administrative acts or authority-specific decisions with an external effect (e.g. issuing of visas), and
- 211 (30 per cent) in regard to other procedures, such as IT-supported procedural checks and documentation of determinations made by the internal audit unit, e-recruitment or project controlling.

¹⁵ See [Annex C Table 7](#) and [Table 8](#).

2.6. 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. [...]*

The use of contact persons for corruption prevention (contact persons), the frequency and type of contact between those contact persons and the management of the respective supreme federal authority or agency, as well as the range of information on corruption prevention provided by contact persons was investigated in the reporting year. These issues are presented in [2.6.1.](#) in relation to the supreme federal

authorities and in [2.6.2.](#) in relation to the agencies within their remit.

2.6.1. Contact persons for corruption prevention in the supreme federal authorities¹⁶

The supreme federal authorities all have a contact person for corruption prevention. The contact person responsible for the Federal Ministry of Family Affairs, Senior Citizens, Women and Youth (BMFSFJ) is, in addition, also responsible for at least one other agency. Between 0 (in the BfDI) and two full-time equivalents (in the Federal Foreign Office) are assigned the tasks of a contact person. Overall, there are 10.9 full-time equivalents spread across 56 employees in the supreme federal authorities.

In five of the supreme federal authorities, contact between the contact person and the agency management occurred both with and without a special reason, in nine of the supreme federal authorities contact occurred without a special reason (e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention), and in four of the supreme federal authorities contact was only made with a special reason (e.g. owing to a case of suspected corruption). In six of the supreme federal authorities contact with the agency management without a special reason occurred at least once every six months, in nine of the supreme federal authorities at least once a year. In five of the supreme federal authorities the contact person had no contact with the agency management.

In the reporting year the contact person in almost all the supreme federal authorities

¹⁶ See [Annex B](#) Table [9](#), Table [10](#) and Table [11](#).

provided a range of information on corruption prevention (or that information was provided on the contact person's initiative or with the contact person's involvement). In 21 of the supreme federal authorities the information was provided in digital form (e.g. Intranet pages, newsletters, emails, video clips, e-learning), in 11 it was provided in analogue, written form. Thirteen of the supreme federal authorities held information events. Nine of the supreme federal authorities provided information in another manner, including in one-to-one meetings with new employees and starter packs on corruption prevention given to new hires.

2.6.2. Contact persons for corruption prevention in the agencies within the remits of the supreme federal authorities¹⁷

Of all the agencies within the remits of the supreme federal authorities, 573 (62 per cent) reported that they have their own contact person for corruption prevention; 301 agencies (32 per cent) stated that they have a contact person who is not a member of their own agency but who is (co-)responsible for it. Fifty-three agencies (six per cent) have no contact person. A total of 152 agencies which have a contact person (17 per cent) are also responsible for at least one other agency. Overall, there are 186,07 full-time equivalents spread across 1,134 employees in the agencies.

In the 874 agencies within the remits of the supreme federal authorities which have a contact person (of their own), that contact person had contact with the agency management both with and without a special reason in 254 agencies (29 per cent). Contact was

made without a special reason in 417 agencies (48 per cent) (e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention) and only with a special reason in 112 agencies (13 per cent) (e.g. owing to a case of suspected corruption). In 342 of the agencies such contact with the agency management without a special reason occurred at least once every six months, in 329 of the agencies it occurred at least once a year. In 140 agencies (16 per cent) the contact person had no contact with the agency management.

In the reporting year, the contact person in 97 per cent of the agencies (851 agencies) provided a range of information on corruption prevention (or that information was provided on the contact person's initiative or with the contact person's involvement). In 850 of the agencies (97 per cent) this information was provided in digital form, in 402 agencies (46 per cent) it was provided in analogue, written form. Information events were held in 242 of the agencies (28 per cent). In 285 of the agencies (33 per cent) information was provided in another manner, including in one-to-one meetings with new employees, in-person or telephone consultations with the contact person upon request, or using posters and desk sets with information on corruption prevention.

2.7. Corruption awareness measures, instruction and training

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

¹⁷ See [Annex C](#) Table 9, Table 10 and Table 11.

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.

Awareness-raising is a key building block when it comes to combating both conduct lacking in integrity and corruption. Corruption awareness measures and the giving of instruction aim to create an awareness among employees of the risks of corrupt behaviour. They are intended to enable employees to recognise situations where there is a risk of corruption and to respond appropriately in such situations.

Training measures go beyond mere awareness-raising.

No. 8 of the Directive: Basic and advanced training

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 organisational units referred to in no. 6.

Basic and advanced training measures involve an interactive process in which a multiplier (the instructor) teaches knowledge on the basis of a specific concept, thereby applying a certain system (didactics). This knowledge is generally taught as part of a multi-stage process and then consolidated. A talk – for instance as part of an orientation event for new employees – is thus not classed as a training course, but as instruction or awareness-raising. E-learning is classed as training if the interactive element of the teaching process plays a recognisable role (e.g. because learning successes are tested).

The Federal Academy of Public Administration, the Federation's central training facility, delivers e-learning courses on corruption prevention as well as ongoing courses on preventing and fighting corruption/compliance for contact persons for corruption prevention and on corruption prevention (awareness-raising) for employees. Topics addressed include the following: the various forms which corruption takes; recognising behaviour which may be corrupting; the tasks of a contact person; fighting corruption (incl. legal provisions); the national and international dimensions of corruption; the consequences under criminal, civil service and labour law for those engaging in corrupt behaviour; what to say and do in the case of suspected corruption.

The situation as regards the implementation of corruption awareness measures, the giving of instruction and holding of training in the

supreme federal authorities is presented in [2.7.1.](#) and in the agencies within their remits in [2.7.2.](#)

2.7.1. Corruption awareness measures, instruction and training in the supreme federal authorities¹⁸

In the reporting year, 24,713 employees (69 per cent of all employees) in the supreme federal authorities took part in corruption awareness measures, were given instruction or underwent training. Of these, 1,617 were supervisory staff (excl. agency management) and 391 were part of the agency management. The share of employees working in AEVC in the supreme federal authorities who took part in corruption awareness measures, were given instruction or underwent training was 85 per cent, i.e. 10,510 employees working in AEVC. Fifteen of the supreme federal authorities (65 per cent) stated that they regularly repeat the corruption awareness measures or instruction for employees working in AEVC. Fourteen of the supreme federal authorities (61 per cent) regularly repeat these measures for all other employees. Six per cent of employees (2,217 employees) in the supreme federal authorities underwent training. Of these, 327 were supervisory staff (excl. agency management). A total of 994 employees in AEVC (eight per cent) underwent training.

2.7.2. Corruption awareness measures, instruction and training in the agencies within the remits of the supreme federal authorities¹⁹

A total of 237,186 employees (48 per cent of all employees) in the agencies within the remits of the supreme federal authorities took part in

corruption awareness measures, were given instruction or underwent training. Of these, 15,839 were supervisory staff (excl. agency management) and 1,138 were part of the agency management. The share of employees working in AEVC in an agency who took part in corruption awareness measures, were given instruction or underwent training was 69 per cent, i.e. 34,302 employees. In total, 774 of the agencies (83 per cent) reported that they regularly repeat corruption awareness measures or instruction for employees working in AEVC. Such measures are regularly repeated for all other employees in 822 of the agencies within the remits of the supreme federal authorities (89 per cent). Three per cent of employees in the agencies underwent training (15,318 employees). Of these, 1,969 were supervisory staff (excl. agency management) and 116 agency managements. Training was given to 3,911 employees working in AEVC (11 per cent).

2.8. Good practices

The surveys conducted for this report regularly include questions about those corruption prevention measures, methods or approaches of which the supreme federal authorities and the agencies within their remits have gained positive experience. Insights into these good practices can inspire others to try out similar ideas in their own agency. Good practices can provide ideas, but no blueprint: when applying new corruption prevention measures, account must also be taken of the requirements of one's own agency. In the following, select good practice examples from among the numerous corruption prevention measures adopted in supreme federal authorities ([2.8.1.](#)) and in the agencies

¹⁸ See [Annex B](#) Table [12](#) and Table [13](#).

¹⁹ See [Annex C](#) Table [12](#) and Table [13](#).

within their remits (2.8.2) are presented in the form of word clouds. These good practices were selected on the basis of a qualitative analysis of the most frequently cited measures as well as particularly innovative best practice examples.

2.8.1. Good practices in the supreme federal authorities



2.8.2. Good practices in the agencies within the remit of the supreme federal authorities



3. Cases of suspected corruption

3.1. Cases in the reporting year

The following cases of suspected corruption were recorded for the reporting year:

- 22 cases which were newly reported,
- 10 ongoing cases which were reported in previous years but had not yet been concluded, and
- seven cases which had previously been reported and were concluded in 2019.

In the following (3.1.), relevant terms used in the Directive are first explained and a brief overview is provided of the procedure for dealing with cases of suspected corruption. New cases reported in 2019 will then be presented (in 3.2.). Finally, those cases which were concluded in the reporting year will be discussed (in 3.3.).

This Annual Report for 2019 is the first to include the number of ongoing cases. The aim in doing so is to be able to create a statistical record of pending cases.

3.2. Terminology and procedure

According to the Directive, in cases of suspected corruption the contact person (no. 5.2) and the head of the agency (no. 10.1) are required to act: the contact person has to make an internal report and provide advice, and the head of an agency has to take steps to prevent the corruption being concealed and notify the public prosecution office and the highest service authority.

3.2.1. Case of suspected corruption

The term “case of suspected corruption” is explained in the handout containing instructions for contact persons for corruption prevention in cases of suspected corruption of 20 September 2013.²⁰ According to the handout, a case of suspected corruption exists where reasonable factual indications for or information concerning the commission of an offence relating to corruption become known in writing or orally, by telephone or in another manner, including in anonymised form. A “factual” indication generally does not include anything which is clearly denunciatory in nature (see point 3 of the aforementioned handout).

3.2.2. Internal investigation

Where there is a case of suspected corruption, the agency management, the contact person and the personnel management are as a rule required to act. They launch an internal investigation and, depending on the outcome of that investigation, notify the criminal prosecution authorities and can, in the case of danger in delay, take measures to prevent the corruption being concealed. Depending on an authority’s organisational structure, the legal department, internal investigation unit, internal audit unit and/or the police’s property protection unit are required to act (see points 4 and 5 of the above-mentioned handout regarding the tasks of all those involved).

3.2.3. Preliminary criminal investigation

Responsibility for conducting a preliminary criminal investigation in a case of suspected corruption lies with the public prosecution

²⁰ The [handout containing instructions for contact persons on corruption prevention in cases of suspected](#)

[corruption of 20 September 2013](#) is available on the BMI’s website (last accessed: 4 Nov. 2020).

office. It first determines whether there are initial grounds for suspicion and then decides whether to launch a preliminary criminal investigation. The preliminary criminal investigation ends either with its termination, with the issuing of a summary penalty order or by public charges being preferred. A case can be terminated if the investigation does not reveal sufficient reason to prefer public charges (section 170 (2) Code of Criminal Procedure (*Strafprozeßordnung*, StPO)), if the offender's guilt is regarded as minor and there is no public interest in prosecution (section 153 Code of Criminal Procedure), or if prosecution can be waived subject to imposition of conditions and directions (section 153a Code of Criminal Procedure). In accordance with section 407 of the Code of Criminal Procedure, a summary penalty order may be considered if, given the outcome of the investigation, the public prosecution office does not regard a main hearing to be necessary. A public prosecution office will prefer public charges in all other cases if the investigation revealed sufficient factual and legal reason to do so (section 170 (1) Code of Criminal Procedure).

3.2.4. Disciplinary proceedings

As a rule, a civil servant's employer will initiate disciplinary proceedings at the same time as the matter is referred to the public prosecution office. These disciplinary proceedings are generally stayed until criminal proceedings have been concluded, whereupon they are resumed. The nature of the disciplinary measure imposed generally depends on the outcome of the criminal proceedings. Where a civil servant is sentenced by a German court to imprisonment for at least one year for an intentional act (section 41 (1) sentence 1 no. 1 Federal Civil

Service Act (*Bundesbeamtengesetz*, BBG)) or to imprisonment for at least six months for bribery in office (section 41 (1) sentence 1 no. 1 Federal Civil Service Act), the civil service relationship ends upon the judgment becoming final. Disciplinary proceedings are then terminated (section 32 (2) no. 2 Federal Disciplinary Act (*Bundesdisziplinargesetz*, BDG)). However, even if the criminal proceedings are terminated or the court imposes a lesser penalty than the aforementioned penalties, disciplinary measures can still be imposed. This is because civil service law lays down stricter requirements of the conduct of civil servants. Under section 5 (1) of the Federal Disciplinary Act, the following disciplinary measures can be imposed against civil servants:

- Reprimand (section 6 Federal Disciplinary Act),
- Regulatory fine (section 7 Federal Disciplinary Act),
- Reduction in salary (section 8 Federal Disciplinary Act),
- Demotion (section 9 Federal Disciplinary Act), or
- Removal from office (section 10 Federal Disciplinary Act).

3.2.5. Measures under labour law

Where a public employee is suspected of corruption, their employer will generally also take measures under labour law. These are also stayed until criminal proceedings have been concluded. However, employers are not required to always follow this procedure and can also take measures (e.g. terminate a contract) while criminal proceedings are ongoing.

The following measures under labour law can be taken against public employees:

- Simple admonition,
- Formal warning,
- Termination of contract with notice, or
- Termination of contract without notice (under section 626 Civil Code (*Bürgerliches Gesetzbuch*, BGB)).

3.2.6. Concluding a case of suspected corruption

A case of suspected corruption is concluded where the office dealing with personnel matters and/or the public prosecution office decide(s) not to open (criminal) proceedings. A case of suspected corruption is likewise concluded where a final or a final and absolute decision is taken in a personnel, disciplinary and/or criminal matter (see point 3 of the handout containing instructions for contact persons on corruption prevention in cases of suspected corruption).

3.3. New cases

In the reporting year, 22 new cases of suspected corruption were reported by seven supreme authorities (AA, BKM, BMF, BMG, BMI, BMVg and BMZ) or agencies within their remits. Of these, nine cases (40 per cent) were already concluded in the course of 2019.

One internal investigation was terminated on account of a lack of sufficient initial grounds for suspicion.

In one case the suspect could no longer be contacted. The case was reported to the competent diplomatic service office in their host country.

Six preliminary criminal investigations were concluded as follows:

- In five cases by terminating proceedings on account of insufficient reason to prefer public charges, and
- In one case with a conviction.

In one case a fine (section 7 Federal Disciplinary Act) was imposed in disciplinary proceedings.

In three cases measures were taken under labour law.

In four of the new cases the suspicion was raised against (in part) unknown persons. In the 19 other new cases a total of 25 people were suspected of corruption or typical related offences (e.g. fraud). Six of them were civil servants, four were public employees, eight were external staff (esp. local staff) and seven were third parties.

It is known how long 12 of these people had been working in their area of activity. The periods ranged from less than three years to more than seven years:

- Two people had been working in the same area of activity for less than three years,
- One person for less than five years,
- Three people for less than seven years, and
- Six people for more than seven years.

Eight of these people were working in an AEVC, four for more than five years. Compensatory measures were taken in regard to one person.

3.3.1. Federal Foreign Office (AA)

The Federal Foreign Office reported one new case in one of its foreign missions in the reporting year. The case was in part brought

against unknown persons, and concerned the misappropriation of visa fees. No further investigations were conducted. The suspected employee terminated his contract with the foreign mission and could no longer be contacted. The incident was reported to the competent diplomatic service office in his host country.

3.3.2. Federal Government Commissioner for Culture and the Media (BKM)

The Prussian Cultural Heritage Foundation (SPK) reported one new case in the reporting year. At least one public employee in the Foundation was involved in the matter. The number of other, including external, suspects is still not known. The case of suspected corruption concerned the award of contracts for minor repair work on buildings and technical facilities as well as their maintenance by the relevant department. Public procurement provisions had been ignored and breached. In the reporting year the internal audit unit launched an in-depth review, as part of an internal investigation, of the information which had come to light.

3.3.3. Federal Ministry of Finance (BMF)

The customs administration reported five new cases in the reporting year. Two of these have already been terminated on account of insufficient reason to prefer public charges.

In one case a civil servant in the customs administration was sent a video game, without further comment, by a third party. The game was worth 30 euro. The suspicion which arose was that of the granting of benefits. A preliminary criminal investigation was launched against the third party in the course of the reporting year and

subsequently terminated on account of insufficient reason to prefer public charges.

One case is being conducted against an unknown person. An authority in the customs administration received the transcript of an anonymous telephone tip-off via the Central Customs Authority for Corruption Information's web portal. It included the information that an employee in that customs authority was passing internal information about upcoming audits on to a company. An internal preliminary investigation was conducted and concluded. It was not possible to establish that any employees in the customs authority in question had acted unlawfully.

A civil servant employed in the customs administration stands accused, in three proven cases, of having manipulated Turkish shipping documents concerning water pipe tobacco and related clearance procedures without further customs clearance having taken place. The tobacco was or was to be resold via third parties. An internal investigation was initially launched in this matter, which was then converted into a preliminary criminal investigation. Disciplinary proceedings were also initiated.

A company which was audited by the customs administration was represented by a tax adviser throughout the audit. The tax adviser supplied a public employee in the customs administration, without being prompted to so, with food vouchers for use in the company being audited's canteen. The vouchers were valued at 250 euro, meaning they constituted a monetary gratuity (granting of benefits). A preliminary criminal investigation was launched against the tax adviser in the reporting year.

A civil servant in the customs administration is suspected of having accepted an advantage (e.g. payment of a meal by a restaurant owner) and of other offences such as aiding tax evasion, abetting or aiding breach of official secrecy, and aiding the receiving, holding or selling of goods obtained by tax evasion. It is not possible to quantify the damage caused. Disciplinary proceedings were initiated. A preliminary criminal investigation was launched.

3.3.4. Federal Ministry of Health (BMG)

In the reporting year the Federal Ministry of Health reported one new case which an external employee in an external company providing system support was involved in. The employee sold internal data to an interested external third party. The advantage gained can be classed as “information advantage through inside knowledge”. It is not possible to quantify the damage caused. The preliminary criminal investigation was concluded. The external employee was sentenced under section 202a of the Criminal Code (*Strafgesetzbuch, StGB*) (data espionage) and for other unconnected offences to imprisonment for one year and eleven months. The penalty was suspended on probation.

3.3.5. Federal Ministry of the Interior, Building and Community (BMI)

The Federal Office for Migration and Refugees (BAMF) and the Federal Police, both agencies within the remit of the Federal Ministry of the Interior, Building and Community, reported a total of seven new cases, five of which have already been concluded.

The BAMF reported five new cases. Three of these were terminated in the reporting year on

account of insufficient reason to prefer public charges.

A public employee in one of the BAMF’s branch offices was suspected of having received payments from an interpreter in return for interpreting contracts. An internal investigation conducted against the suspect was referred to the police and the public prosecution office. The preliminary criminal investigation was terminated on account of insufficient reason to prefer public charges.

One case of suspected corruption concerned an interpreter who was working for the BAMF. An anonymous letter accused the interpreter of supposedly having received money from asylum seekers in return for supplying grounds for asylum and made-up background stories. The interpreter supposedly took between 1,500 and 2,500 euro in cash from each asylum seeker. An internal investigation was referred to the police and the public prosecution office. The preliminary criminal investigation was terminated on account of insufficient reason to prefer public charges.

An unknown individual is suspected of having given an unlawful advantage to an interpreting agency both in regard to the awarding of translation contracts and determining the remuneration to be paid by the BAMF for those contracts, for which that person accepted an undue advantage. An internal investigation was referred to the police and the public prosecution office. The preliminary criminal investigation was terminated on account of insufficient reason to prefer public charges.

According to an anonymous letter, a public employee in one of the BAMF’s branch offices

together with a relative supposedly used information gained while working in the asylum procedure office to regularly smuggle foreigners into Germany illegally. In return, the employee and the relative supposedly received cash totalling 8,000 euro. An internal investigation was launched, which was then referred to the police and the public prosecution office.

An asylum seeker at one of the BAMF's arrival centres offered, when her file was opened, to pay to have her fingerprints deleted so that she could apply for asylum in another EU member state. The employees who were present at the time immediately warded off this attempted corruption and reported the matter. An internal investigation was referred to the police and the public prosecution office.

The Federal Police reported two new cases of suspected corruption in the reporting year, the first of which was concluded in the reporting year. There were disciplinary consequences. The second case was concluded in the reporting year on account of its being terminated pursuant to section 153 (1) of the Code of Criminal Procedure on the ground of negligibility.

An officer in the Federal Police repeatedly spent time in an airline's kitchen area and lounge without having any official reason to do so. During his visits to the lounge he was given newspapers, coffee and baked goods by a member of the kitchen staff. It is not possible to quantify the advantage gained. The officer only reported the matter to his supervisor after the airline's flight manager informed him that the area was not open to police officers. The officer had not previously notified the agency of the benefits he had gained. Disciplinary proceedings

were initiated against the officer and concluded with his being fined 1,000 euro.

Disciplinary proceedings were launched against an officer in the Federal Police because he had written to several distilleries from his personal computer at work pretending to be organising an event to mark a service anniversary. He requested that gin be sent to him for tasting. He assumed that the distillery would provide the alcohol free of charge. Investigations are still ongoing into whether the suspect actually received any free samples. The public prosecution office terminated the criminal proceedings launched against the officer for fraud pursuant to section 153 (1) of the Code of Criminal Procedure on the ground of negligibility. The disciplinary proceedings are still pending.

3.3.6. Federal Ministry of Defence (BMVg)

The Federal Ministry of Defence reported three new cases in the reporting year.

An official in the Bundeswehr Service Centre favoured a craft business when awarding contracts and erroneously signed off on services which had (not) been delivered. Benefits may have been granted. An internal investigation was referred to the police and the public prosecution office, and a preliminary criminal investigation launched. Disciplinary proceedings were also launched against the official.

Two clients of the Verwertungsgesellschaft des Bundes (VEGEB GmbH) each sent an envelope to the Bundeswehr Materials Management containing official documents as well as 50 euro in cash. The total benefit gained is 100 euro. The agency immediately reported the matter, and an internal investigation was launched.

A company is suspected of having granted a civil servant working in a technical centre a benefit in the form of 15 electronic entertainment and communication devices valued at a total of 10,322.90 euro. The benefit accepted by the employee is equal to that amount. It is not yet possible to recognise what exactly the Bundeswehr employee received in return. An internal investigation was referred to the police and the public prosecution office, and a preliminary criminal investigation was launched. Disciplinary proceedings were also initiated against the civil servant.

3.3.7. Federal Ministry for Economic Cooperation and Development (BMZ)

The Gesellschaft für Internationale Zusammenarbeit (GIZ) reported four new cases in the reporting year.

Two external employees working in procurement within GIZ accepted a gift of 600 euro in cash from a supplier. Measures were taken under labour law once the internal investigation had been completed. One suspect was given a formal warning. The other suspect's contract was terminated without notice. A preliminary criminal investigation was launched.

An external employee was found not to be applying the relevant rules in regard to small-scale procurement contracts. Instead she intentionally caused a distortion of competition in relation to service providers and received a commission for doing so. She received these kickbacks²¹ in the form of unquantifiable benefits. The internal audit unit launched an

internal investigation. Measures were taken under labour law once the internal investigation had been completed. The suspect's contract was terminated with notice. A preliminary criminal investigation was launched.

An external employee is suspected of having manipulated the award of a contract in favour of a specific service provider (the contract concerned the supply of rental vehicles and drivers) in return for which she was promised payment of a kickback. Measures were taken under labour law once the internal investigation had been completed. The suspect's contract was terminated without notice. A preliminary criminal investigation was launched.

Two external employees in a country office pressured an expert to conclude a contract for the supply of an expert report in which an excessive fee was quoted so that the excess could be taken as a kickback. The damage caused to the public purse is 9,000 euro. This damage was taken out of GIZ's profit. Both suspects' contracts were terminated without notice. A preliminary criminal investigation was launched.

3.4. Concluded cases

Four supreme authorities (BMF, BMI, BMU and BMVI) or agencies within their remits reported seven concluded cases of suspected corruption in the reporting year. Five preliminary criminal investigations and four disciplinary proceedings were concluded as a result.

The preliminary criminal investigations were concluded in the following manner:

²¹ The term "kickback" refers to the clandestine payments which the third party made to these GIZ employees. For internal purposes these payments are classed as

corruption because they represent collusive action in the abuse of power placed in a person to mutual advantage.

- In three cases by terminating the case on account of insufficient reason to prefer public charges (section 170 (2) Code of Criminal Procedure),
- In one case by terminating the case on the ground of negligibility (section 153 Code of Criminal Procedure), and
- In one case by terminating the case subject to imposition of conditions and directions (section 153a Code of Criminal Procedure).

The disciplinary proceedings were concluded in the following manner:

- In one case by demoting the suspect (section 9 Federal Disciplinary Act),
- In one case by removal from office (section 10 Federal Disciplinary Act),
- In one case by retiring the official (section 32 (1) no. 4 Federal Disciplinary Act), and
- In one case on account of the death of the official in question (section 32 (2) no. 1 Federal Disciplinary Act).

A total of 15 people were involved in corruption or typical related offences (e.g. fraud) in these seven concluded cases. Seven of these people were civil servants and eight were public employees. In one case, an unknown number of third parties is also under suspicion. It is not possible to state whether, and if so with what outcome, proceedings are being conducted or were concluded against these individuals as no information is available in that regard. The case is thus classed as “concluded”.

The 15 suspects had been working in the same area of activity from between less than six months and more than seven years:

- One person had been working in the same area of activity for less than six months,
- Five people for less than one year,
- One person for less than three years,
- Two people for less than five years, and
- Seven people for more than seven years.

Twelve people were working in AEVC, seven of them for more than five years. Compensatory measures were taken in regard to six people working in AEVC.

3.4.1. Federal Ministry of Finance (BMF)

Of the agencies within the remit of the Federal Ministry of Finance, the Institute for Federal Real Estate (BImA) and the local customs authorities (ZOB) together reported two concluded cases in the reporting year.

The Institute for Federal Real Estate reported that a case of suspected corruption which had been reported in 2013 against a civil servant, a public employee and an unspecified number of third parties was concluded in 2019. The facts are as follows: The employees of the Institute for Federal Real Estate were suspected of fraud in the context of the conversion of real property formerly used for military purposes. An investigation was conducted against external third parties on suspicion of fraud and accepting an advantage. The proceedings launched against the two employees were terminated. In its orders terminating the proceedings the court stated that the acts of which the indicted accused were accused could no longer be

prosecuted as less serious criminal offences (*Vergehen*) (section 153a (2) sentence 5 Code of Criminal Procedure) and the court therefore finally terminated the proceedings pursuant to section 153a of the Code of Criminal Procedure against payment of fines. No investigations were conducted against any other employees. The unspecified number of third parties were external individuals with whom the employees working in the Institute did not cooperate. It is not possible to state whether, and if so with what outcome, proceedings were conducted against these external third parties, as no information is available in that regard.

The local customs authorities reported one concluded case in the reporting year in which the suspicion of corruption was confirmed. The case was first reported in 2008. A civil servant in the customs administration received rewards, gifts and other advantages valued at a total of approx. 4,500 euro in relation to his public office from the owner of a firm. In return he entered the export notices which the firm had submitted in the IT system and then released the goods for export. In doing so he was aware that the goods to be exported had not first been presented to the customs office and that he bore partial responsibility for these exports. The disciplinary proceedings against the civil servant were terminated in accordance with section 32 (2) no. 1 of the Federal Disciplinary Act on account of his death.

3.4.2. Federal Ministry of the Interior, Building and Community (BMI)

The Federal Ministry of the Interior, Building and Community reported one internal case of suspected corruption which was first reported in 2016. A civil servant was suspected of awarding

contracts for services to an entrepreneur he was friends with, thereby breaching internal guidelines on the award of contracts as well as the Contracting Rules for the Award of Public Supply and Services Contracts (*Vergabe- und Vertragsordnung für Leistungen, VOL*). The advantage gained amounts to contracts worth a total of 500,000 euro. The disciplinary proceedings were concluded, the civil servant in question being demoted by one service grade. The preliminary criminal investigation was terminated on account of insufficient reason to prefer public charges.

The Federal Office for Migration and Refugees (BAMF), which falls within the remit of the Federal Ministry of the Interior, reported two concluded cases.

The BAMF's Anti-Corruption Ombudsperson received an anonymous tip-off in 2018. According to that information, six employees in one of the BAMF's branch offices had received, among other things, gifts and cash from a total of 10 interpreters. There was also a suspicion of false invoicing for interpretation services. Also, one of the employees supposedly, contrary to official instructions, gave an interpreter a binding assurance in relation to a 14-month interpreting assignment. The case involved two civil servants and four public employees. The preliminary criminal investigations against all the suspects were terminated in accordance with section 170 (2) of the Code of Criminal Procedure on account of insufficient reason to prefer public charges.

In 2016 a civil servant in the BAMF was suspected of misappropriation of budget funds. The actual or anticipated damage to the public purse was cited as 33,987.74 euro. The restitution made amounted to 18,487.74 euro.

Disciplinary proceedings were terminated under section 66 of the Federal Disciplinary Act by the passing of judgment, and the civil servant was removed from office in accordance with section 10 of that Act.

3.4.3. Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU)

The Federal Ministry for the Environment, Nature Conservation and Nuclear Safety reported the conclusion of one case which was first reported in 2016. A civil servant was suspected of having breached the obligation under section 61 (1) sentence 2 of the Federal Civil Service Act to execute his office in an objective and trustworthy manner and the obligation under section 61 (1) sentence 3 of the Federal Civil Service Act to conduct himself respectably both while at work and not at work. Criminal proceedings were terminated on account of insufficient reason to prefer public charges. The disciplinary proceedings were terminated in accordance with section 32 (1) no. 4 of the Federal Disciplinary Act, as disciplinary measures could not be imposed against the civil servant owing to mitigating circumstances (he had retired).

3.4.4. Federal Ministry of Transport and Digital Infrastructure (BMVI)

One case within the remit of the Federal Ministry of Transport and Digital Infrastructure was concluded in the reporting year.

In 2017 three public employees working in the goods delivery department in the Federal Maritime and Hydrographic Agency (BSH) supposedly each received a gift worth 30 euro from a company which had business dealings

with the agency. The gifts were neither reported nor authorised. The preliminary criminal investigation against one of the suspects was terminated on account of insufficient reason to prefer public charges. The preliminary criminal investigation against the other two suspects was terminated in accordance with section 153 (1) of the Code of Criminal Procedure on the ground of negligibility.

4. Prevention of corruption in the international context

The prevention of corruption is addressed in the context of various international forums. Particular mention should be made of the United Nations (UN), the G20's Anti-Corruption Working Group, the Organisation for Economic Cooperation and Development (OECD) and the Council of Europe's Group of States against Corruption (GRECO). The Federal Ministry of the Interior, Building and Community represents the Federal Government in these bodies when it comes to the issue of corruption.

The approach adopted by the federal administration in regard to the prevention of corruption and Germany's expertise in this area are highly regarded at international level. The concept of a contact person for corruption prevention has won explicit international acclaim.²² The OECD has adopted it as a good practice solution and includes in its integrity reviews and reports the recommendation that a contact person be appointed. In particular, the fact that contact persons are assigned purely preventative tasks and that they are part of no investigatory unit – as is the case in some other countries – is regarded highly. Cooperation between government departments through the network of contact persons and their cooperation with the respective agencies within

their respective remits also serves as a model. GRECO also regularly recommends employing a “person who provides confidential advice” in the context of its evaluations.

Evaluations are regularly conducted. The situation as regards implementation of the United Nations Convention against Corruption (UNCAC) is regularly reviewed. Each review encompasses several cycles covering individual areas of the Convention: first criminalisation, law enforcement and international cooperation, and then corruption prevention and asset recovery/recovery procedures. A country review of Germany regarding corruption prevention and asset recovery/recovery procedures was conducted in 2018. The executive summary of that country review²³ and the full report²⁴ are available in English on the UN's website.

GRECO likewise conducts regular evaluations of its members states. The on-site visit to Germany as part of the Fifth Evaluation Round on preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies was carried out in December 2019. GRECO adopted the report at its plenary meeting on 29 October 2020. It will soon also be published in German.

²² See [2.4](#).

²³ The [Executive Summary of the Country Review Report of the State of Implementation by Germany of the United Nations Convention against Corruption \(UNCAC\)](#) is available in English on the UN's website (last accessed: 4 Nov. 2020).

²⁴ The full [Country Review Report of the State of Implementation by Germany of the United Nations Convention against Corruption \(UNCAC\)](#) is available in English on the UN's website (last accessed: 10 Nov. 2020).

5. Outlook

On the recommendation of the Bundesrechnungshof (the German Supreme Audit Institution), the Federal Ministry of the Interior proposed conflating the separate reports on corruption prevention, on sponsoring and on the use of external persons as of the reporting year 2020 and suggested publishing this information in one single report on integrity within the public administration. The Bundestag Committee on Internal Affairs and Community approved this proposal at its 102nd meeting on 7 October 2020, as did the Budget Committee at its 75th meeting on 28 October 2020.

The new report on integrity in the federal administration will be submitted on 30 September each year, the first on 30 September 2021.

The revision of the Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration, which was proposed in 2017, continued in the reporting year and is to be incorporated into a planned legislative proposal on corruption prevention, sponsoring and the use of external persons in the federal administration. In anticipation of these legislative regulations, the following principles on which consensus has already been reached as part of the revision process are to be applied in regard to rotation:

- The equivalence of preventive measures,
- The equivalence of rotation measures, and
- The agencies' responsibility for rules on rotation.

Annex

Annex A – Data basis

Annex A Table 1 – Supreme federal authorities included in the report

Abbreviation	Full name
AA	Federal Foreign Office
BBk	Deutsche Bundesbank
BfDI	Federal Commissioner for Data Protection and Freedom of Information
BKAmt	Federal Chancellery
BKM	Federal Government Commissioner for Culture and the Media
BMAS	Federal Ministry of Labour and Social Affairs
BMBF	Federal Ministry of Education and Research
BMEL	Federal Ministry of Food and Agriculture
BMF	Federal Ministry of Finance
BMFSFJ	Federal Ministry for Families, Senior Citizens, Women and Youth
BMG	Federal Ministry of Health
BMI	Federal Ministry of the Interior, Building and Community
BMJV	Federal Ministry of Justice and Consumer Protection
BMU	Federal Ministry for the Environment, Nature Conservation and Nuclear Safety
BMVg	Federal Ministry of Defence
BMVI	Federal Ministry of Transport and Digital Infrastructure
BMWi	Federal Ministry for Economic Affairs and Energy
BMZ	Federal Ministry for Economic Cooperation and Development
BPA	Press and Information Office of the Federal Government
BPrA	Office of the Federal President
BR	Bundesrat
BRH	Bundesrechnungshof (German Supreme Audit Institution) (Administration)
BT	German Bundestag
BVerfG	Federal Constitutional Court

Annex A Table 2 – Agencies within the remits of the supreme federal authorities included in the report

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
DAI	AA	German Archaeological Institute	Other body (e.g. foundation, institution)
ZIF	AA	Berliner Zentrum für internationale Friedenseinsätze gGmbH	Legal entity under private law
BND	BKAmt	Federal Intelligence Service	Higher federal authority
AdK	BKM	Academy of Arts	Higher federal authority
BArch	BKM	Federal Archives	Higher federal authority
BKGE	BKM	Federal Institute for Culture and History of the Germans in Eastern Europe	Higher federal authority
BKHSS	BKM	Federal Chancellor Helmut Schmidt Foundation	Other body (e.g. foundation, institution)
BStU	BKM	Federal Commissioner for the Files of the State Security Service of the Former German Democratic Republic	Higher federal authority
BWBS	BKM	Federal Chancellor Willy Brandt Foundation	Other body (e.g. foundation, institution)
DHM	BKM	German Historical Museum Foundation	Other body (e.g. foundation, institution)
DNB	BKM	German National Library	Other body (e.g. foundation, institution)
FFA	BKM	German Federal Film Board	Other body (e.g. foundation, institution)
HdG	BKM	Haus der Geschichte der Bundesrepublik Deutschland Foundation	Other body (e.g. foundation, institution)
JMB	BKM	Jewish Museum Berlin Foundation	Other body (e.g. foundation, institution)

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
KBB	BKM	Kulturveranstaltungen des Bundes in Berlin GmbH	Other body (e.g. foundation, institution)
OvBSt	BKM	Otto von Bismarck Foundation	Other body (e.g. foundation, institution)
RFEG	BKM	President Friedrich Ebert Memorial Foundation	Other body (e.g. foundation, institution)
SPK	BKM	Prussian Cultural Heritage Foundation	Other body (e.g. foundation, institution)
StAA	BKM	Federal Foundation for the Study of the Communist Dictatorship in Eastern Germany	Other body (e.g. foundation, institution)
StBKAH	BKM	Home of Federal Chancellor Adenauer Foundation	Other body (e.g. foundation, institution)
StDfdeJE	BKM	Foundation Memorial to the Murdered Jews of Europe	Other body (e.g. foundation, institution)
THH	BKM	Home of Federal President Theodor Heuss Foundation	Other body (e.g. foundation, institution)
Transit	BKM	Transit Film GmbH	Legal entity under private law
BAG**	BMAS	Federal Labour Court	Federal court
BAS	BMAS	Federal Office for Social Security	Higher federal authority
BAuA	BMAS	Federal Institute for Occupational Safety and Health	Higher federal authority
BG BAU	BMAS	Trade Association of the Building Industry	Other body (e.g. foundation, institution)
BGW	BMAS	Trade Association for Occupational Health and Public Welfare	Other body (e.g. foundation, institution)
BSG	BMAS	Federal Social Court	Federal court

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
DRV Bund	BMAS	German Federal Pension Insurance	Other body (e.g. foundation, institution)
DRV KBS	BMAS	German Pension Insurance for Minors, Railway Workers and Seafarers	Other body (e.g. foundation, institution)
SVLFG	BMAS	Social Insurance for the Agriculture, Forestry and Horticulture Sectors	Other body (e.g. foundation, institution)
VBG	BMAS	Employers' Liability Insurance Association	Other body (e.g. foundation, institution)
BIBB	BMBF	Federal Institute for Vocational Education and Training	Other body (e.g. foundation, institution)
BfR	BMEL	Federal Institute for Risk Assessment	Other body (e.g. foundation, institution)
BLE	BMEL	Federal Office for Agriculture and Food	Other body (e.g. foundation, institution)
BSA	BMEL	Federal Office of Plant Varieties	Higher federal authority
BVL	BMEL	Federal Office of Consumer Protection and Food Safety	Higher federal authority
DBFZ	BMEL	Deutsches Biomasseforschungszentrum gemeinnützige GmbH	Legal entity under private law
FLI	BMEL	Friedrich Loeffler Institute	Higher federal authority
JKI	BMEL	Julius Kühn Institute	Higher federal authority
MRI	BMEL	Max Rubner Institute, Federal Research Centre for Nutrition and Food	Higher federal authority
Thünen	BMEL	Johann Heinrich von Thünen Institute	Higher federal authority

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
BaFin	BMF	Federal Financial Supervisory Authority	Other body (e.g. foundation, institution)
BAnst PT	BMF	Deutsche Bundespost Federal Posts and Telecommunications Agency	Other body (e.g. foundation, institution)
BDr	BMF	Bundesdruckerei GmbH	Legal entity under private law
BImA	BMF	Institute for Federal Real Estate	Other body (e.g. foundation, institution)
BZSt	BMF	Federal Central Tax Office	Higher federal authority
EVZ	BMF	Foundation Remembrance, Responsibility and Future	Other body (e.g. foundation, institution)
EWN	BMF	Entsorgungswerk für Nuklearanlagen GmbH	Legal entity under private law
FA	BMF	Bundesrepublik Deutschland - Finanzagentur GmbH	Legal entity under private law
FMSA	BMF	Federal Agency for Financial Market Stabilisation	Other body (e.g. foundation, institution)
GZD	BMF	Customs – Central Customs Authority	Higher federal authority
ITZBund	BMF	Federal Information Technology Centre	Other body (e.g. foundation, institution)
LMBV	BMF	Lausitzer und Mitteldeutsche Bergbau-Verwaltungsgesellschaft mbH	Legal entity under private law
MSPT	BMF	Museum Foundation Post and Telecommunications	Other body (e.g. foundation, institution)
VEBEG	BMF	VEBEG GmbH	Legal entity under private law
ZOB	BMF	Customs – Local Authorities	Cumulative entry for 49 lower-level federal authorities

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
BAFzA	BMFSFJ	Federal Office of Family Affairs and Civil Society Functions	Higher federal authority
BPjM	BMFSFJ	Federal Review Board for Media Harmful to Minors	Higher federal authority
BfArM	BMG	Federal Institute for Drugs and Medical Devices	Higher federal authority
BZgA	BMG	Federal Centre for Health Education	Higher federal authority
DIMDI	BMG	German Institute for Medical Documentation and Information	Higher federal authority
PEI	BMG	Paul Ehrlich Institute	Higher federal authority
RKI	BMG	Robert Koch Institute	Higher federal authority
BAA	BMI	Federal Equalisation of Burdens Office	Higher federal authority
BADV	BMI	Federal Office for Central Services and Unresolved Property Issues	Higher federal authority
BAMF	BMI	Federal Office for Migration and Refugees	Higher federal authority
Baukultur	BMI	Federal Foundation <i>Baukultur</i>	Other body (e.g. foundation, institution)
BBK	BMI	Federal Office of Civil Protection and Disaster Assistance	Higher federal authority
BBR	BMI	Federal Office for Building and Regional Planning	Higher federal authority
BDBOS	BMI	Federal Agency for Public Safety Digital Radio	Other body (e.g. foundation, institution)
BeschA	BMI	Procurement Office of the Federal Ministry of the Interior	Higher federal authority
BfV	BMI	Federal Office for the Protection of the Constitution (Secrecy)	Higher federal authority

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
BiB	BMI	Federal Institute for Population Research	Other body (e.g. foundation, institution)
BISp	BMI	Federal Institute of Sport Science	Higher federal authority
BKA	BMI	Federal Criminal Police Office	Higher federal authority
BKG	BMI	Federal Office for Cartography and Geodesy	Higher federal authority
BpB	BMI	Federal Agency for Political Education	Higher federal authority
BPOL	BMI	Federal Police	Cumulative entry for 12 lower-level federal authorities
BPOLP	BMI	Federal Police Headquarters	Higher federal authority
BSI	BMI	Federal Office for Information Security	Higher federal authority
BVA	BMI	Federal Office of Administration	Higher federal authority
HS Bund	BMI	Federal University of Applied Administrative Sciences	Higher federal authority
StBA	BMI	Federal Statistical Office	Higher federal authority
THW	BMI	Federal Agency for Technical Relief	Higher federal authority
ZITiS	BMI	Central Office for Information Technology in the Security Sector	Higher federal authority
BFH	BMJV	Federal Fiscal Court	Federal court
BfJ	BMJV	Federal Office of Justice	Higher federal authority
BGH	BMJV	Federal Court of Justice	Federal court
BPatG	BMJV	Federal Patent Court	Federal court
BVerwG	BMJV	Federal Administrative Court	Federal court
DPMA	BMJV	German Patent and Trade Mark Office	Higher federal authority

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
GBA	BMJV	Public Prosecutor General of the Federal Court of Justice	Federal court
BASE	BMU	Federal Office for the Safety of Nuclear Waste Management	Higher federal authority
BfN	BMU	Federal Agency for Nature Conservation	Higher federal authority
BfS	BMU	Federal Office for Radiation Protection	Higher federal authority
BGE	BMU	Bundes-Gesellschaft für Endlagerung mbH	Legal entity under private law
BGZ	BMU	Gesellschaft für Zwischenlagerung mbH	Legal entity under private law
UBA	BMU	Federal Environment Agency	Higher federal authority
ZUG	BMU	Zukunft – Umwelt – Gesellschaft gGmbH	Legal entity under private law
BAMAD	BMVg	Federal Armed Forces Counterintelligence Office	Higher federal authority
AMK	BMVg	Office for Military Studies	Mid-level federal authority
BiZBw	BMVg	Bundeswehr Training Centre	Higher federal authority
BiZBw-U	BMVg	Bundeswehr Training Centre	Cumulative entry for 15 lower-level federal authorities
BAAINBw	BMVg	Federal Office of Bundeswehr Equipment, Information Technology and In-Service Support	Higher federal authority
BAAINBw M	BMVg	Federal Office of Bundeswehr Equipment, Information Technology and In-Service Support	Cumulative entry for 10 mid-level federal authorities
BAPersBw	BMVg	Federal Office of Bundeswehr Personnel Management	Higher federal authority
BAPersBw-U	BMVg	Federal Office of Bundeswehr Personnel Management	Cumulative entry for 16 lower-level federal authorities

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
BAIUDBw	BMVg	Federal Office of Bundeswehr Infrastructure, Environmental Protection and Services	Higher federal authority
BAIUDBw-U	BMVg	Federal Office for Bundeswehr Infrastructure, Environmental Protection and Services	Cumulative entry for 52 lower-level federal authorities
BSprA	BMVg	Federal Office of Languages	Higher federal authority
BwBekl	BMVg	Bundeswehr-Bekleidungsmanagement GmbH	Legal entity under private law
BwCon	BMVg	Bundeswehr-Consulting GmbH	Legal entity under private law
BWI	BMVg	BWI-Informationstechnik GmbH	Legal entity under private law
BWDA	BMVg	Disciplinary Attorney General for the Bundeswehr at the Federal Administrative Court	Federal court
EinFüKdo	BMVg	Bundeswehr Operations Command	Higher federal authority
EinFüKdo-U	BMVg	Bundeswehr Operations Command	Lower-level federal authority
EKA	BMVg	Office of the Protestant Church for the Bundeswehr	Higher federal authority
EKA-M	BMVg	Office of the Protestant Church for the Bundeswehr	Cumulative entry for 4 mid-level federal authorities
EKA-U	BMVg	Office of the Protestant Church for the Bundeswehr	Cumulative entry for 100 lower-level federal authorities
FB BwV	BMVg	Federal Defence Administration Department in the Federal University of Applied Administrative Sciences	Mid-level federal authority
FüAkBw	BMVg	Federal Armed Forces Command and Staff College	Higher federal authority

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
GEKA	BMVg	Gesellschaft zur Entsorgung von chemischen Kampfstoffen und Rüstungsaltslasten mbH	Legal entity under private law
HIL	BMVg	Heeresinstandsetzungslogistik GmbH	Legal entity under private law
KMBA	BMVg	Catholic Military Bishopric Office	Higher federal authority
KMBA-M	BMVg	Catholic Military Bishopric Office	Cumulative entry for 4 mid-level federal authorities
KMBA-U	BMVg	Catholic Military Bishopric Office	Cumulative entry for 76 lower-level federal authorities
Kdo CIR	BMVg	German Cyber and Information Domain Service Headquarters	Higher federal authority
Kdo CIR-M	BMVg	German Cyber and Information Domain Service Headquarters	Cumulative entry for 5 mid-level federal authorities
Kdo CIR-U	BMVg	German Cyber and Information Domain Service Headquarters	Cumulative entry for 20 lower-level federal authorities
Kdo H	BMVg	German Army Headquarters	Higher federal authority
Kdo H-M	BMVg	German Army Headquarters	Cumulative entry for 10 mid-level federal authorities
Kdo H-U	BMVg	German Army Headquarters	Cumulative entry for 99 lower-level federal authorities
Kdo Lw	BMVg	German Air Force Headquarters	Higher federal authority

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
Kdo Lw-M	BMVg	German Air Force Headquarters	Cumulative entry for 2 mid-level federal authorities
Kdo Lw-U	BMVg	German Air Force Headquarters	Cumulative entry for 61 lower-level federal authorities
Kdo SanDstBw	BMVg	Federal Armed Forces Medical Corps Headquarters	Higher federal authority
Kdo SanDstBw-M	BMVg	Federal Armed Forces Medical Corps Headquarters	Cumulative entry for 8 mid-level federal authorities
Kdo SanDstBw-U	BMVg	Federal Armed Forces Medical Corps Headquarters	Cumulative entry for 37 lower-level federal authorities
Kdo SKB	BMVg	German Joint Support and Enabling Service Headquarters	Higher federal authority
Kdo SKB-M	BMVg	German Joint Support and Enabling Service Headquarters	Cumulative entry for 35 mid-level federal authorities
Kdo SKB-U	BMVg	German Joint Support and Enabling Service Headquarters	Cumulative entry for 59 lower-level federal authorities
LufABw	BMVg	Federal Office of the Bundeswehr for Military Aviation	Higher federal authority
MarKdo	BMVg	German Navy Headquarters	Higher federal authority
MarKdo-M	BMVg	German Navy Headquarters	Cumulative entry for 4 mid-level federal authorities
MarKdo-U	BMVg	German Navy Headquarters	Cumulative entry for 58 lower-level federal authorities
PlgABw	BMVg	Bundeswehr Office for Defence Planning	Higher federal authority

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
TDG Nord	BMVg	Bundeswehr Disciplinary and Complaints Court, North	Federal court
TDG Süd	BMVg	Bundeswehr Disciplinary and Complaints Court, South	Federal court
UniBw Hbg	BMVg	University of the Federal Armed Forces in Hamburg	Higher federal authority
UniBw M	BMVg	University of the Federal Armed Forces in Munich	Higher federal authority
ZInFü	BMVg	Leadership Development and Civic Education Centre	Higher federal authority
ZInFü-M	BMVg	Leadership Development and Civic Education Centre	Mid-level federal authority
ZInFü-U	BMVg	Leadership Development and Civic Education Centre	Lower-level federal authority
Autobahn	BMVI	Die Autobahn GmbH des Bundes	Legal entity under private law
BAF	BMVI	Federal Supervisory Authority for Air Navigation Services	Higher federal authority
BAG**	BMVI	Federal Office for Goods Transport	Higher federal authority
BASt	BMVI	Federal Highway Research Centre	Higher federal authority
BAV	BMVI	Federal Agency for Administrative Services	Higher federal authority
BAW	BMVI	Federal Institute for Waterway Engineering and Research	Higher federal authority
BEU	BMVI	Federal Bureau of Rail Accident Investigation	Higher federal authority
BEV	BMVI	Federal Railway Property Agency	Other body (e.g. foundation, institution)
BfG	BMVI	Federal Institute of Hydrology	Higher federal authority
BFU	BMVI	Federal Bureau of Aircraft Accident Investigation	Higher federal authority
BSH	BMVI	Federal Maritime and Hydrographic Agency	Higher federal authority
BSU	BMVI	Federal Bureau of Maritime Casualty Investigation	Higher federal authority
DB	BMVI	Deutsche Bahn	Legal entity under private law
DFS	BMVI	Deutsche Flugsicherung GmbH	Legal entity under private law

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
DWD	BMVI	German Meteorological Service	Higher federal authority
EBA	BMVI	Federal Railway Authority	Higher federal authority
FBA	BMVI	Federal Trunk Road Authority	Higher federal authority
Fluko	BMVI	Flughafenkoordination Deutschland GmbH	Legal entity under private law
GDWS	BMVI	Federal Waterways and Shipping Agency	Mid-level federal authority
GDWSuB	BMVI	Federal Waterways and Shipping Agency (lower-level authorities)	Cumulative entry for 32 lower-level federal authorities
HK	BMVI	Central Command for Maritime Emergencies	Higher federal authority
KBA	BMVI	Federal Motor Transport Authority	Higher federal authority
LBA	BMVI	Federal Aviation Office	Higher federal authority
NOW	BMVI	NOW GmbH Nationale Organisation Wasserstoff- und Brennstoffzellentechnologie	Legal entity under private law
TC	BMVI	Toll Collect GmbH	Legal entity under private law
BAFA	BMWi	Federal Office for Economic Affairs and Export Control	Higher federal authority
BAM	BMWi	Federal Institute for Materials Research and Testing	Higher federal authority
BGR	BMWi	Federal Institute for Geosciences and Natural Resources	Higher federal authority
BKartA	BMWi	Federal Cartel Office	Higher federal authority
BNetzA	BMWi	Federal Network Agency	Higher federal authority
GTAI	BMWi	Germany Trade & Invest – Gesellschaft für Außenwirtschaft und Standortmarketing mbH	Legal entity under private law
PTB	BMWi	National Metrology Institute of Germany	Higher federal authority

Abbreviation	Supreme federal authority	Full name of agency/ associated company	Administrative level/ organisational form
WIK	BMWi	Wissenschaftliches Institut für Infrastruktur und Kommunikationsdienste GmbH	Legal entity under private law
Wismut	BMWi	Wismut GmbH	Legal entity under private law
DEval	BMZ	German Institute for Development Evaluation	Legal entity under private law
EG	BMZ	Engagement Global gGmbH	Legal entity under private law
GIZ	BMZ	Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH	Legal entity under private law

** The abbreviation “BAG” is used in the report to denote both the Federal Labour Court and the Federal Office for Goods Transport.

Annex A Table 3 – Supreme federal authorities and agencies included in the report (total)

Supreme federal authority	No. of federal supreme authorities	No. of agencies within remit	No. of agencies of federal supreme authority and remit	No. of employees in supreme federal authority	No. of employees within remit	No. of employees in supreme federal authority and remit
AA	1	2	3	11,805	495	12,300
BBk	1	0	1	–	–	–
BfDI	1	0	1	205	0	205
BKAmt	1	1	2	757	–	–
BKM	1	20	21	338	6,619	6,957
BMAS	1	10	11	1,232	39,465	40,697
BMBF	1	1	2	1,112	720	1,832
BMEL	1	9	10	1,036	7,421	8,457
BMF	1	63	64	2,070	60,281	62,351
BMFSFJ	1	2	3	870	1,399	2,269
BMG	1	5	6	783	3,710	4,493
BMI	1	33	34	2,036	68,844	70,880
BMJV	1	7	8	853	4,919	5,772
BMU	1	7	8	1,239	5,057	6,296
BMVg	1	709	710	2,623	235,296	237,919
BMVI	1	56	57	1,464	28,245	29,709
BMWi	1	9	10	1,838	9,566	11,404
BMZ	1	3	4	1,210	24,314	25,524
BPA	1	0	1	489	0	489
BPrA	1	0	1	227	0	227
BR	1	0	1	194	0	194
BRH	1	0	1	256	0	256
BT	1	0	1	3,021	0	3,021
BVerfG	1	0	1	287	0	287
Total	24	937	961	35,945	496,351	531,539

Annex A Table 4 – Agencies which did not respond, including reasons²⁵

Abbreviation	Full name	Supreme federal authority	Administrative level	Reason for not responding
BBk	Deutsche Bundesbank	BBk	Supreme federal authority	Rights of self-government
BDr	Bundesdruckerei GmbH	BMF	Legal entity under private law	Own compliance system
BfV	Federal Office for the Protection of the Constitution	BMI	Higher federal authority	Secrecy
BG BAU	Trade Association of the Building Industry	BMAS	Higher federal authority	Rights of self-government
BGW	Trade Association for Occupational Health and Public Welfare	BMAS	Higher federal authority	Rights of self-government
BND	Federal Intelligence Service	BKAmt	Higher federal authority	Secrecy
DB	Deutsche Bahn AG	BMVI	Legal entity under private law	Own compliance system
BAMAD	Federal Office for the Military Counter-intelligence Service	BMVg	Higher federal authority	Secrecy
AMK	Office for Military Studies	BMVg	Mid-level federal authority	Secrecy
TC	Toll Collect GmbH	BMVI	Legal entity under private law	Own compliance system
VBG	Employers' Liability Insurance Association	BMAS	Higher federal authority	Rights of self-government

²⁵ An agency is included even if it states that it is not responding and provides reasons why.

Annex B – Implementation of the Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration (Directive) in the supreme federal authorities

Annex B Table 1 – Basic data

Supreme federal authority	Does your agency apply the Directive (analogously)?	No. of agencies within remit	No. of agencies (individual entry)	No. of agencies (cumulative entry)	Cumulative entry by	No. of agencies within remit which responded	No. of agencies within remit which did not respond
AA	Yes	2	2	0		2	0
BfDI	Yes	0	0	0		–	–
BKAmt	Yes	1	0	0		0	1
BKM	Yes	20	20	0		20	0
BMAS	Yes	10	10	0		7	3
BMBF	Yes	1	1	0		1	0
BMEL	Yes	9	9	0		9	0
BMF	Yes	63	13	49	ZOB (49)	62	1
BMFSFJ	Yes	2	2	0		2	0
BMG	Yes	5	5	0		5	0
BMI	Yes	33	18	14	BADV & BAA (2), BPOL (12)	32	1
BMJV	Yes	7	7	0		7	0

Supreme federal authority	Does your agency apply the Directive (analogously)?	No. of agencies within remit	No. of agencies (individual entry)	No. of agencies (cumulative entry)	Cumulative entry by	No. of agencies within remit which responded	No. of agencies within remit which did not respond
BMU	Yes	7	7	0		7	0
BMVg	Yes	709	0	707	BMVg (remit) (707)	707	2
BMVI	Yes	56	22	32	GDWSuB (32)	54	2
BMWi	Yes	9	9	0		9	0
BMZ	Yes	3	3	0		3	0
BPA	Yes	0	0	0		-	-
BPrA	Yes	0	0	0		-	-
BR	Yes	0	0	0		-	-
BRH	Yes	0	0	0		-	-
BT	Yes	0	0	0		-	-
BVerfG	Yes	0	0	0		-	-
Total	23	937	128	802		927	10

Annex B Table 2 – Data basis concerning areas of activity especially vulnerable to corruption (AEVC)

Supreme federal authority	Is the no. of AEVC in your agency known?	When is the next update or initial identification of AEVC planned?
AA	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BfDI	Yes, identification process fully completed in past five calendar years	Not currently planned
BKAmt	Yes, identification process fully completed in past five calendar years	In 3–5 years
BKM	Yes, identification process done more than five years ago	In 3–5 years
BMAS	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BMBF	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BMEL	Yes, identification process done more than five years ago	In current calendar year (year following reporting year) or in next calendar year
BMF	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BMFSFJ	Yes, identification process fully completed in past five calendar years	In 3–5 years
BMG	Yes, identification process fully completed in past five calendar years	Not currently planned
BMI	Yes, identification process fully completed in past five calendar years	In 3–5 years
BMJV	Yes, identification process fully completed in past five calendar years	In 3–5 years

Supreme federal authority	Is the no. of AEVC in your agency known?	When is the next update or initial identification of AEVC planned?
BMU	Yes, identification process done more than five years ago	In current calendar year (year following reporting year) or in next calendar year
BMVg	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BMVI	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BMWi	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BMZ	Yes, identification process fully completed in past five calendar years	Not currently planned
BPA	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BPrA	Yes, identification process partially completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BR	Yes, identification process done more than five years ago	In current calendar year (year following reporting year) or in next calendar year
BRH	Yes, identification process done more than five years ago	In current calendar year (year following reporting year) or in next calendar year
BT	Yes, identification process fully completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year
BVerfG	Yes, identification process partially completed in past five calendar years	In current calendar year (year following reporting year) or in next calendar year

Annex B Table 3 – Areas of activity especially vulnerable to corruption (AEVC) and risk analyses

Supreme federal authority	No. of employees	No. of AEVC	No. of employees working in AEVC	Does the process of identifying AEVC include the agency's management level?	Agency management	Management level below agency management	% of employees working in AEVC	No. of AEVC for which the risk analyses were conducted	No. of risk analyses completed in relation to no. of AEVC
AA	11,805	6,941	6,941	Yes	No	Yes	59%	6,941	100%
BfDI	205	7	47	Yes	Yes	Yes	23%	0	0%
BKAmt	757	163	159	Yes	No	Yes	21%	163	100%
BKM	338	143	151	No	–	–	45%	143	100%
BMAS	1,232	209	209	Yes	Yes	Yes	17%	209	100%
BMBF	1,112	362	362	Yes	No	Yes	33%	362	100%
BMEL	1,036	102	102	No	–	–	10%	0	0%
BMF	2,070	136	241	Yes	No	Yes	12%	0	0%
BMFSFJ	870	94	94	No	–	–	11%	0	0%
BMG	783	129	308	No	–	–	39%	129	100%
BMI	2,036	706	706	Yes	No	Yes	35%	706	100%
BMJV	853	384	384	Yes	No	Yes	45%	384	100%
BMU	1,239	79	224	No	–	–	18%	60	76%
BMVg	2,623	855	855	Yes	Yes	Yes	33%	739	86%
BMVI	1,464	257	244	No	–	–	17%	158	61%
BMW i	1,838	791	791	No	–	–	43%	655	83%

Supreme federal authority	No. of employees	No. of AEVC	No. of employees working in AEVC	Does the process of identifying AEVC include the agency's management level?	Agency management	Management level below agency management	% of employees working in AEVC	No. of AEVC for which the risk analyses were conducted	No. of risk analyses completed in relation to no. of AEVC
BMZ	1,210	506	506	Yes	Yes	Yes	42%	410	81%
BPA	489	96	99	No	-	-	20%	96	100%
BPrA	227	7	46	Yes	No	Yes	20%	7	100%
BR	194	5	20	Yes	No	Yes	10%	0	0%
BRH	256	35	34	Yes	Yes	Yes	13%	35	100%
BT	3,021	314	314	No	-	-	10%	314	100%
BVerfG	287	0	0	No	-	-	0%	0	0%
Total	35,945	12,321	12,837				36%	11,511	90%

Annex B Table 4 – Compensatory measures taken in areas of activity especially vulnerable to corruption (AEVC)

Supreme federal authority	No. of employees	No. of employees working in AEVC	Is your data basis sufficient to be able to say how many employees had been working in the same/similar AEVC for more than five years in the reporting period?	How many employees had been working in the same/similar AEVC for more than five years on the cut-off date (31 Dec.)?	% of employees working in AEVC for more than five years	For how many employees working in the same/similar AEVC for more than five years were suitable, effective and documented compensatory measures designed to reduce the risk taken?	For what percentage of employees working in the same/similar AEVC for more than five years were suitable, effective and documented compensatory measures designed to reduce the risk taken?
AA	11,805	6,941	No	–	–	–	–
BfDI	205	47	No	–	–	–	–
BKAmt	757	159	Yes	33	4%	33	100%
BKM	338	151	Yes	38	11%	38	100%
BMAS	1,232	209	No	–	–	–	–
BMBF	1,112	362	Yes	78	7%	0	0%
BMEL	1,036	102	No	–	–	–	–
BMF	2,070	241	No	–	–	–	–
BMFSFJ	870	94	No	–	–	–	–
BMG	783	308	No	–	–	–	–
BMI	2,036	706	Yes	132	6%	119	90%
BMJV	853	384	Yes	83	10%	83	100%
BMU	1,239	224	Yes	102	8%	31	30%
BMVg	2,623	855	Yes	102	4%	77	75%

Supreme federal authority	No. of employees	No. of employees working in AEVC	Is your data basis sufficient to be able to say how many employees had been working in the same/similar AEVC for more than five years in the reporting period?	How many employees had been working in the same/similar AEVC for more than five years on the cut-off date (31 Dec.)?	% of employees working in AEVC for more than five years	For how many employees working in the same/similar AEVC for more than five years were suitable, effective and documented compensatory measures designed to reduce the risk taken?	For what percentage of employees working in the same/similar AEVC for more than five years were suitable, effective and documented compensatory measures designed to reduce the risk taken?
BMVI	1,464	244	No	–	–	–	–
BMWi	1,838	791	Yes	220	12%	193	88%
BMZ	1,210	506	Yes	68	6%	50	74%
BPA	489	99	Yes	57	12%	57	100%
BPrA	227	46	Yes	20	9%	0	0%
BR	194	20	Yes	11	6%	11	100%
BRH	256	34	Yes	14	5%	14	100%
BT	3,021	314	Yes	49	2%	43	88%
BVerfG	287	0	–	–	–	–	–
Total	35,945	12,837		1,007	8%	749	74%

Annex B Table 5 – Administrative and task-related supervision tools

Supreme federal authority	Which tools do you apply in your agency as part of administrative and task-related supervision?*	Does the agency have its own internal audit unit?
AA	3	Yes, part of the agency on whose behalf I am responding
BfDI	2	No, no internal auditing unit is responsible for the agency on whose behalf I am responding
BKAmt	2	Yes, part of the agency on whose behalf I am responding
BKM	1	Yes, not part of the agency on whose behalf I am responding, and (co)responsible for the agency on whose behalf I am responding
BMAS	3	Yes, part of the agency on whose behalf I am responding
BMBF	5	Yes, part of the agency on whose behalf I am responding
BMEL	1	Yes, part of the agency on whose behalf I am responding
BMF	3	Yes, part of the agency on whose behalf I am responding
BMFSFJ	5	Yes, part of the agency on whose behalf I am responding
BMG	1	Yes, part of the agency on whose behalf I am responding
BMI	5	Yes, part of the agency on whose behalf I am responding
BMJV	2	No, no internal auditing unit is responsible for the agency on whose behalf I am responding
BMU	5	Yes, part of the agency on whose behalf I am responding
BMVg	5	Yes, part of the agency on whose behalf I am responding
BMVI	2	Yes, part of the agency on whose behalf I am responding
BMW i	2	Yes, part of the agency on whose behalf I am responding
BMZ	5	Yes, part of the agency on whose behalf I am responding
BPA	2	Yes, part of the agency on whose behalf I am responding
BPrA	2	No, no internal auditing unit is responsible for the agency on whose behalf I am responding
BR	2	Yes, part of the agency on whose behalf I am responding
BRH	2	Yes, part of the agency on whose behalf I am responding
BT	5	Yes, part of the agency on whose behalf I am responding
BVerfG	2	Yes, part of the agency on whose behalf I am responding
Total	23	23
Percentage	100%	100%

***Administrative and task-related supervision tools**

Stage 1: General provisions on administrative and task-related supervision (e.g. guidelines on corruption prevention)

Stage 2: Stage 1 and further-going internal written rules, e.g. internal regulations (guidelines, codes of conduct)

Stage 3: **Stage 2** and, in addition, internal control system documented in writing for at least some areas in agency and documented analysis of the frequency and subject-matter of controls

Stage 4: **Stage 2** and, in addition, comprehensive internal control system documented in writing and documented analysis of the frequency and subject-matter of controls

Stage 5: Stage 3 or Stage 4 and, in addition, audits conducted by an internal audit unit

Annex B Table 6 – Rules on cooperation with subordinate agencies

Supreme federal authority	No. of agencies within remit	Does your agency exercise administrative and task-related supervision over other agencies (excl. cases of exclusively legal supervision)?	Do you regularly share information on corruption prevention with these subordinate agencies?	Do you have any rules on cooperation with your subordinate agencies when it comes to handling cases of suspected corruption?
AA	2	Yes	Yes	No
BfDI	0	No	–	–
BKAmt	1	No	–	–
BKM	20	Yes	No	No
BMAS	10	Yes	Yes	No
BMBF	1	No	–	–
BMEL	9	Yes	No	Yes
BMF	63	Yes	Yes	Yes
BMFSFJ	2	Yes	Yes	Yes
BMG	5	Yes	Yes	No
BMI	33	Yes	Yes	Yes
BMJV	7	Yes	Yes	Yes
BMU	7	Yes	Yes	Yes
BMVg	707	Yes	Yes	Yes
BMVI	56	Yes	Yes	Yes
BMWi	9	Yes	Yes	Yes
BMZ	3	No	–	–
BPA	0	No	–	–
BPrA	0	No	–	–
BR	0	No	–	–
BRH	0	No	–	–
BT	0	No	–	–
BVerfG	0	No	–	–

Annex B Table 7 – Principle of greater scrutiny (measures taken to ensure the principle is applied)

Supreme federal authority	Does your agency implement measures to ensure the principle of greater scrutiny is applied?	Second staff member checks work results	Plausibility check	IT-supported workflows
AA	Yes	Yes	Yes	Yes
BfDI	Yes	Yes	No	No
BKAmt	Yes	Yes	Yes	Yes
BKM	Yes	Yes	Yes	Yes
BMAS	Yes	Yes	Yes	Yes
BMBF	Yes	Yes	Yes	Yes
BMEL	Yes	Yes	Yes	Yes
BMF	Yes	Yes	Yes	Yes
BMFSFJ	Yes	Yes	Yes	Yes
BMG	Yes	Yes	Yes	Yes
BMI	Yes	Yes	Yes	Yes
BMJV	Yes	Yes	Yes	No
BMU	Yes	Yes	Yes	Yes
BMVg	Yes	Yes	Yes	Yes
BMVI	Yes	Yes	Yes	Yes
BMWi	Yes	Yes	Yes	Yes
BMZ	Yes	Yes	Yes	Yes
BPA	Yes	Yes	Yes	Yes
BPrA	Yes	Yes	Yes	No
BR	Yes	No	Yes	Yes
BRH	Yes	Yes	Yes	Yes
BT	Yes	Yes	Yes	Yes
BVerfG	Yes	Yes	Yes	No

Annex B Table 8 – Principle of greater scrutiny (IT-supported workflows)

Supreme federal authority	Procurement measures	Allocation of funds (institutional funding, project funding)	Clearing allowances under civil service law	Personnel measures	Clearing travel expenses	Other measures with budgetary or other financial effect	Issuing of other administrative acts or authority-specific decisions with external effect (e.g. granting visas)
AA	No	No	No	Yes	No	Yes	Yes
BfDI	–	–	–	–	–	–	–
BKAmt	Yes	No	Yes*	No	Yes*	Yes	No
BKM	No	No	No	No	Yes	Yes	No
BMAS	Yes	No	Yes	No	Yes	No	No
BMBF	Yes	Yes	Yes	No	Yes	Yes	No
BMEL	Yes	Yes	No	No	Yes	Yes	No
BMF	Yes	No	No	No	No	Yes	No
BMFSFJ	Yes	Yes	No	No	No	No	Yes
BMG	No	No	No	Yes	Yes	Yes	No
BMI	Yes	No	Yes	Yes	Yes	No	No
BMJV	–	–	–	–	–	–	–
BMU	Yes	Yes	No	Yes	Yes	Yes	Yes
BMVg	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BMVI	No	No	No	Yes	No	Yes	No
BMW _i	Yes	Yes	No	No	Yes	Yes	No
BMZ	Yes	No	No	No	No	No	No
BPA	Yes	No	No	Yes	Yes	Yes	No
BPrA	–	–	–	–	–	–	–
BR	Yes	No	No	Yes	Yes	No	No
BRH	Yes	No	No	No	Yes	Yes	No
BT	No	No	No	No	Yes	Yes	No
BVerfG	–	–	–	–	–	–	–

* The Federal Administrative Office (BVA) is responsible for clearing allowances under civil service law and travel expenses.

Annex B Table 9 – Contact person for corruption prevention (CPCP)

Supreme federal authority	Do you have a CPCP?	Is the CPCP also responsible for at least one other agency for which a separate questionnaire was completed?	How many full-time equivalents are assigned the tasks of the CPCP and his/her deputy?	Across how many people are they spread?
AA	Yes	No	2	3
BfDI	Yes	No	0	2
BKAmt	Yes	No	0.7	11
BKM	Yes	No	0.2	2
BMAS	Yes	No	0.06	2
BMBF	Yes	No	1.5	3
BMEL	Yes	No	0.5	2
BMF	Yes	No	0.3	2
BMFSFJ	Yes	Yes	0.2	1
BMG	Yes	No	0.12	2
BMI	Yes	No	0.2	2
BMJV	Yes	No	0.01	2
BMU	Yes	No	1.25	4
BMVg	Yes	No	1	2
BMVI	Yes	No	0.9	2
BMWi	Yes	No	0.25	2
BMZ	Yes	No	0.3	1
BPA	Yes	No	0.2	2
BPrA	Yes	No	0.05	1
BR	Yes	No	0.2	1
BRH	Yes	No	0.3	3
BT	Yes	No	0.3	3
BVerfG	Yes	No	0.33	1
Total			10.9	56

Annex B Table 10 – Contact with agency management

Supreme federal authority	How would you describe the contact between the CPCP and the agency management in the reporting year?	Frequency of contact without specific reason with agency management in the reporting year
AA	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once a year
BfDI	Only with a specific reason (e.g. a case of suspected corruption)	At least once a year
BKAmt	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once every six months
BKM	No contact	–
BMAS	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once every six months
BMBF	Only with a specific reason (e.g. a case of suspected corruption)	–
BMEL	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once a year
BMF	No contact	–
BMFSFJ	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once a year
BMG	No contact	–
BMI	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once a year
BMJV	Only with a specific reason (e.g. a case of suspected corruption)	–
BMU	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once a year
BMVg	Contact both with and without a specific reason	At least once every six months

Supreme federal authority	How would you describe the contact between the CPCP and the agency management in the reporting year?	Frequency of contact without specific reason with agency management in the reporting year
BMVI	Contact both with and without a specific reason	At least once a year
BMW <i>i</i>	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once every six months
BMZ	Contact both with and without a specific reason	At least once a year
BPA	No contact	–
BPrA	Without specific reason; e.g. at regular meetings, as part of general reporting or information-sharing on corruption prevention	At least once a year
BR	Only with a specific reason (e.g. a case of suspected corruption)	–
BRH	No contact	–
BT	Contact both with and without a specific reason	At least once every six months
BVerfG	Only with a specific reason (e.g. a case of suspected corruption)	–

Annex B Table 11 – Provision of information

Supreme federal authority	Did the CPCP provide (initiate or participate in providing) information on corruption prevention in the reporting year?	In digital form (e.g. Intranet pages, newsletters, emails, video clips)	In analogue, written form	Information event(s)	Provision of other information
AA	Yes	Yes	Yes	Yes	Yes
BfDI	Yes	Yes	No	No	Yes
BKAmt	Yes	Yes	Yes	Yes	No
BKM	Yes	Yes	Yes	No	Yes
BMAS	Yes	Yes	No	Yes	No
BMBF	Yes	Yes	No	No	No
BMEL	Yes	Yes	No	No	No
BMF	Yes	Yes	Yes	Yes	No
BMFSFJ	Yes	Yes	Yes	No	Yes
BMG	Yes	Yes	Yes	Yes	No
BMI	Yes	Yes	Yes	Yes	Yes
BMJV	Yes	No	No	Yes	No
BMU	Yes	Yes	No	No	Yes
BMVg	Yes	Yes	Yes	Yes	No
BMVI	Yes	Yes	Yes	Yes	No
BMWi	Yes	Yes	No	Yes	No
BMZ	Yes	Yes	Yes	Yes	Yes
BPA	Yes	Yes	Yes	No	Yes
BPrA	Yes	Yes	No	Yes	Yes
BR	No	–	–	–	–
BRH	Yes	Yes	No	No	No
BT	Yes	Yes	No	Yes	No
BVerfG	Yes	Yes	No	No	No

Annex B Table 12 – Corruption awareness measures, instruction and training

Supreme federal authority	No. of employees who took part in corruption awareness measures, instruction or training	% of employees who took part in corruption awareness measures, instruction or training	No. of employees in AEVC who took part in corruption awareness measures, instruction or training	% of employees in AEVC who took part in corruption awareness measures, instruction or training	Supervisory staff (excl. agency management) who took part in corruption awareness measures, instruction or training	Agency management who took part in corruption awareness measures, instruction or training	No. of employees who underwent training	% of employees who underwent training	No. of employees in AEVC who underwent training	% of employees in AEVC who underwent training	Supervisory staff (excl. agency management) who underwent training	Agency management who underwent training
AA	11,805	100%	6,941	100%	412	237	188	2%	2	0%	1	0
BfDI	0	0%	0	0%	0	0	0	0%	0	0%	0	0
BKAmt	757	100%	159	98%	116	1	49	6%	49	31%	11	0
BKM	58	17%	19	13%	3	0	0	0%	0	0%	0	0
BMAS	122	10%	41	20%	23	0	23	2%	23	11%	23	0
BMBF	1,112	100%	362	100%	128	3	19	2%	9	2%	0	0
BMEL	3	0%	0	0%	0	0	3	0%	0	0%	0	0
BMF	128	6%	0	0%	0	0	0	0%	0	0%	0	0
BMFSFJ	780	90%	94	100%	91	1	0	0%	0	0%	0	0
BMG	165	21%	99	77%	36	0	150	19%	99	32%	36	0
BMI	514	25%	0	0%	0	0	1	0%	0	0%	0	0
BMJV	853	100%	384	100%	151	5	0	0%	0	0%	0	0
BMU	103	8%	21	27%	4	0	11	1%	6	3%	0	0
BMVg	2,388	91%	855	100%	59	135	0	0%	0	0%	0	0
BMVI	1,464	100%	244	95%	183	2	76	5%	6	2%	20	0
BMWi	1,396	76%	639	81%	138	0	1,396	76%	639	81%	138	0
BMZ	1,210	100%	506	100%	145	2	63	5%	26	5%	2	0
BPA	178	36%	54	56%	11	0	152	31%	49	49%	11	0

Supreme federal authority	No. of employees who took part in corruption awareness measures, instruction or training	% of employees who took part in corruption awareness measures, instruction or training	No. of employees in AEVC who took part in corruption awareness measures, instruction or training	% of employees in AEVC who took part in corruption awareness measures, instruction or training	Supervisory staff (excl. agency management) who took part in corruption awareness measures, instruction or training	Agency management who took part in corruption awareness measures, instruction or training	No. of employees who underwent training	% of employees who underwent training	No. of employees in AEVC who underwent training	% of employees in AEVC who underwent training	Supervisory staff (excl. agency management) who underwent training	Agency management who underwent training
BPrA	17	7%	3	43%	0	0	0	0%	0	0%	0	0
BR	10	5%	0	0%	0	0	0	0%	0	0%	0	0
BRH	4	2%	4	11%	2	0	1	0%	1	3%	0	0
BT	1,626	54%	85	27%	113	5	85	3%	85	27%	85	0
BVerfG	20	7%	–	–	2	0	0	–	–	–	0	0
Total	24,713	69%	10,510	85%	1,617	391	2,217	6%	994	8%	327	0

Annex B Table 13 – Repeat corruption awareness measures, instruction and training

Supreme federal authority	How often are corruption awareness measures/instruction repeated in your agency for employees in AEVC?	How often are corruption awareness measures/instruction repeated in your agency for other employees?
AA	At regular intervals	At regular intervals
BfDI	Not repeated	Not repeated
BKAmt	At regular intervals	At regular intervals
BKM	At regular intervals	At regular intervals
BMAS	At regular intervals	At regular intervals
BMBF	At regular intervals	At regular intervals
BMEL	Not repeated	Not repeated
BMF	Not repeated	Not repeated
BMFSFJ	At regular intervals	At regular intervals
BMG	Not repeated	Not repeated
BMI	At regular intervals	Not repeated
BMJV	At regular intervals	At regular intervals
BMU	Not repeated	Not repeated
BMVg	At regular intervals	At regular intervals
BMVI	At regular intervals	Not repeated
BMWi	At regular intervals	At regular intervals
BMZ	At regular intervals	At regular intervals
BPA	At regular intervals	At regular intervals
BPrA	Not repeated	Not repeated
BR	Not repeated	Not repeated
BRH	At regular intervals	At regular intervals
BT	At regular intervals	At regular intervals
BVerfG	Not repeated	At regular intervals

Annex C – Implementation of Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration (Directive) in the agencies within the remits of the supreme federal authorities

Annex C Table 1 – Basic data

Supreme federal authority	Does your agency apply the Directive (analogously)? (no. of agencies within remit which participated in data collection and responded “Yes”)
AA	2
BKAmt	0
BKM	20
BMAS	7
BMBF	1
BMEL	9
BMF	62
BMFSFJ	2
BMG	5
BMI	32
BMJV	7
BMU	7
BMVg	707
BMVI	54
BMWi	9
BMZ	3
Total	927

Annex C Table 2 – Data basis concerning areas of activity especially vulnerable to corruption (AEVC)

Supreme federal authority	No. of agencies within remit	Is the no. of AEVC in your agency known?				When is the next update or initial identification of AEVC planned?		
		Yes, identification process fully completed in past five calendar years	Yes, identification process partially completed in past five calendar years	Yes, identification process done more than five years ago	No	In current calendar year (year following reporting year) or in next calendar year	In next 3–5 years	Not currently planned
AA	2	2	0	0	0	0	2	0
BKM	20	12	4	1	3	8	1	11
BMAS	7	4	1	1	1	5	2	0
BMBF	1	1	0	0	0	1	0	0
BMEL	9	0	3	4	2	7	0	2
BMF	62	57	2	1	2	58	3	1
BMFSFJ	2	1	0	1	0	2	0	0
BMG	5	2	0	3	0	4	1	0
BMI	32	26	2	1	3	26	4	2
BMJV	7	6	0	1	0	3	4	0
BMU	7	4	3	0	0	6	1	0
BMVg	707	370	45	51	241	218	151	338
BMVI	54	40	2	9	3	46	6	2
BMWi	9	5	3	0	1	4	4	1
BMZ	3	0	1	1	1	2	0	1
Total	927	530	66	74	257	390	179	358
Percentage share	100%	57%	7%	8%	28%	42%	19%	39%

Annex C Table 3 – Areas of activity especially vulnerable to corruption (AEVC) and risk analyses

Supreme federal authority	No. of employees	No. of AEVC	No. of employees working in AEVC	Does the process of identifying AEVC also include the management level?		Agency management		Management level below agency management		% of employees working in AEVC	No. of AEVC for which risk analyses were conducted	No. of risk analyses conducted in relation to no. of AEVC
				Yes	No	Yes	No	Yes	No			
AA	495	52	101	2	0	1	1	2	0	20%	50	96%
BKM	6,619	495	763	15	2	14	6	12	8	12%	236	48%
BMAS	39,465	576	3,825	6	0	5	2	5	2	10%	517	90%
BMBF	720	84	84	1	0	1	0	1	0	12%	0	0%
BMEL	7,421	339	558	5	2	3	6	4	5	8%	43	13%
BMF	60,281	4,916	6,405	58	2	58	4	6	56	11%	4,319	88%
BMFSFJ	1,399	338	429	1	1	2	0	0	2	31%	325	96%
BMG	3,710	649	1,032	5	0	5	0	4	1	28%	574	88%
BMI	68,844	9,100	13,077	27	2	26	6	21	11	19%	6,067	67%
BMJV	4,919	1,677	2,315	6	1	6	1	4	3	47%	1,654	99%
BMU	5,057	1,623	2,653	5	2	4	3	5	2	52%	1,503	93%
BMVg	235,296	5,094	7,010	387	79	195	271	397	69	3%	4,747	93%
BMVI	28,245	2,863	8,665	48	3	14	40	44	10	31%	2,690	94%
BMW _i	9,566	506	2,580	5	3	5	4	1	8	27%	463	92%
BMZ	24,314	7	329	1	2	1	0	1	0	79%	0	0%
Total	496,351	28,319	49,826	572	99	340	344	507	177	10%	23,188	82%

Annex C Table 4 – Compensatory measures taken in areas of activity especially vulnerable to corruption (AEVC)

Supreme federal authority	Is your data basis sufficient to be able to say how many employees had already been working in the same/similar AEVC for more than five years in the reporting period?	How many employees had already been working in the same/similar AEVC for more than five years on the cut-off date (31 Dec.)?	No. of employees working in AEVC for more than five years	For how many employees who had been working in the same/similar AEVC for more than five years were suitable, effective and documented compensatory measures designed to reduce the risk taken?	For what percentage of employees who had been working in the same/similar AEVC for more than five years were suitable, effective and documented compensatory measures designed to reduce the risk taken?
AA	2	51	10%	51	100%
BKM	15	529	8%	145	27%
BMAS	2	109	0.3%	109	100%
BMBF	1	46	6%	0	0%
BMEL	4	155	2%	67	43%
BMF	59	2,326	4%	1,994	86%
BMFSFJ	2	44	3%	30	68%
BMG	3	270	7%	165	61%
BMI	24	2,823	4%	1,108	39%
BMJV	6	1,110	23%	995	90%
BMU	4	134	3%	134	100%
BMVg	339	996	0.4%	656	66%
BMVI	43	3,159	11%	3,156	100%
BMW _i	6	930	10%	433	47%
BMZ	1	25	0.1%	21	84%
Total	511	12,707	26%	9,064	71%

Annex C Table 5 – Administrative and task-related supervision tools

Supreme federal authority	No. of agencies	What administrative and task-related supervision tools do you apply in your agency?*					Does your agency have an internal audit unit?		
		1	2	3	4	5	Yes, part of the agency on whose behalf I am responding	Yes, not part of the agency on whose behalf I am responding, and (co)responsible for the agency on whose behalf I am responding	No, no internal audit unit is responsible for the agency on whose behalf I am responding
AA	2	0	0	0	1	1	1	0	1
BKM	20	7	11	0	0	2	6	6	8
BMAS	7	1	3	1	0	2	5	0	2
BMBF	1	0	0	1	0	0	0	0	1
BMEL	9	2	5	1	0	1	2	0	7
BMF	62	0	5	0	0	57	61	0	1
BMFSFJ	2	0	1	1	0	0	1	0	1
BMG	5	1	4	0	0	0	2	0	3
BMI	32	2	9	2	0	19	25	5	2
BMJV	7	0	5	1	0	1	2	0	5
BMU	7	0	2	1	1	3	5	0	2
BMVg	707	570	90	32	5	10	18	652	18
BMVI	54	2	44	3	2	3	3	50	1
BMWi	9	1	2	1	0	5	7	1	1
BMZ	3	0	0	2	0	1	2	0	1
Total	927	586	181	46	9	105	140	714	54
Percentage share	100%	63%	20%	5%	1%	11%	15%	77%	6%

***Administrative and task-related supervision tools**

Stage 1: General provisions on administrative and task-related supervision (e.g. guidelines on corruption prevention)

Stage 2: Stage 1 and further-going internal written rules, e.g. internal regulations (guidelines, codes of conduct)

Stage 3: **Stage 2** and, in addition, internal control system documented in writing for at least some areas in agency and documented analysis of the frequency and subject-matter of controls

Stage 4: **Stage 2** and, in addition, comprehensive internal control system documented in writing and documented analysis of the frequency and subject-matter of controls

Stage 5: Stage 3 or Stage 4 and, in addition, audits conducted by an internal audit unit

Annex C Table 6 – Rules on cooperation with subordinate agencies

Supreme federal authority	No. of agencies within remit	Does your agency exercise administrative and task-related supervision over other agencies (excl. cases of exclusively legal supervision)?		Do you regularly share information on corruption prevention with these subordinate agencies?		Do you have any rules on cooperation with your subordinate agencies when it comes to handling cases of suspected corruption?	
		Yes	No	Yes	No	Yes	No
AA	2	0	2	–	–	–	–
BKM	20	0	20	–	–	–	–
BMAS	7	1	6	0	1	0	1
BMBF	1	0	1	–	–	–	–
BMEL	9	0	9	–	–	–	–
BMF	62	3	59	1	2	1	2
BMFSFJ	2	0	2	–	–	–	–
BMG	5	0	5	–	–	–	–
BMI	32	14	18	14	0	14	0
BMJV	7	0	7	–	–	–	–
BMU	7	1	6	1	0	1	0
BMVg	707	217	490	67	173	174	69
BMVI	54	2	52	2	0	2	0
BMWi	9	0	9	–	–	–	–
BMZ	3	0	3	–	–	–	--
Total	927	238	689	85	176	192	72
Percentage share	100%	26%	74%	9%	19%	21%	8%

Annex C Table 7 – Principle of greater scrutiny (measures taken to ensure the principle is applied)

Supreme federal authority	No. of agencies within remit	Does your agency implement measures to ensure the principle of greater scrutiny is applied?	Second staff member checks work results	Plausibility check	IT-supported workflows
AA	2	2	2	2	1
BKM	20	20	20	15	10
BMAS	7	7	7	6	6
BMBF	1	1	1	1	1
BMEL	9	9	9	6	8
BMF	62	62	60	61	60
BMFSFJ	2	2	2	2	2
BMG	5	5	5	5	5
BMI	32	32	29	30	30
BMJV	7	7	6	7	5
BMU	7	7	6	7	5
BMVg	707	608	498	463	506
BMVI	54	54	53	52	52
BMWi	9	9	9	8	8
BMZ	3	3	3	3	3
Total	927	828	710	668	702
Percentage share	100%	89%	77%	72%	76%

Annex C Table 8 – Principle of greater scrutiny (IT-supported workflows)

Supreme federal authority	No. of agencies within remit with IT-supported workflows	No. of agencies within remit/procurement measures	No. of agencies within remit/allocation of funds (institutional funding, project funding)	No. of agencies within remit/clearing allowances under civil service law	No. of agencies within remit/personnel measures	No. of agencies within remit/clearing travel expenses	No. of agencies within remit/other measures with budgetary or other financial effect	No. of agencies within remit/issuing other administrative acts or authority-specific decisions with external effect (e.g. granting of visas)	No. of agencies within remit/other procedures
AA	1	1	0	0	0	0	0	0	0
BKM	10	8	2	1	4	6	8	0	2
BMAS	6	5	1	2	1	3	5	2	0
BMBF	1	1	1	0	0	1	1	0	0
BMEL	8	7	1	1	4	5	4	1	1
BMF	60	60	50	4	54	56	59	51	56
BMFSFJ	2	1	1	0	0	1	1	1	0
BMG	5	4	2	1	4	4	5	4	1
BMI	30	28	6	17	20	26	24	19	16
BMJV	5	5	0	0	0	3	5	4	2
BMU	5	5	2	0	4	4	4	3	2
BMVg	506	320	21	18	148	360	340	21	125
BMVI	52	46	5	4	11	50	13	6	2
BMW _i	8	6	1	1	5	7	8	3	3
BMZ	3	3	0	0	2	1	2	0	1

Total **702** **500** **93** **49** **257** **527** **479** **115** **211**

Annex C Table 9 – Contact person for corruption prevention (CPCP)

Supreme federal authority	No. of agencies within remit	Do you have a CPCP?			Is the CPCP responsible for at least one other agency for which a separate questionnaire was completed?		How many full-time equivalents are assigned the tasks of the CPCP and his/her deputy?	Across how many people are they spread?
		Yes, part of the agency on whose behalf I am responding	Yes, not part of the agency on whose behalf I am responding, and (co)responsible for the agency on whose behalf I am responding	No, no CPCP is responsible for the agency on whose behalf I am responding	Yes	No		
AA	2	2	0	0	0	2	0.26	2
BKM	20	18	0	2	2	16	3.79	22
BMAS	7	7	0	0	0	7	1.85	14
BMBF	1	1	0	0	0	1	0.25	1
BMEL	9	9	0	0	0	9	2.96	15
BMF	62	60	1	1	1	60	24.88	89
BMFSFJ	2	1	1	0	0	1	0.11	2
BMG	5	5	0	0	0	5	2.05	10
BMI	32	31	1	0	3	28	29.46	171
BMJV	7	7	0	0	0	7	1.29	12
BMU	7	7	0	0	0	7	2.05	9
BMVg	707	395	263	49	145	372	104.99	731
BMVI	54	19	35	0	1	18	7.62	35
BMW _i	9	8	0	1	0	8	1.48	12
BMZ	3	3	0	0	0	3	3.03	9
Total	927	573	301	53	152	544	186.07	1,134
Percentage share	100%	62%	32%	6%	17%	62%		

Annex C Table 10 – Contact with agency management

Supreme federal authority	How would you describe contact between the CPCP and the agency management in the reporting year?					How often was there contact without a specific reason with the agency management in the reporting year?		
	No. of agencies within remit with CPCP	Contact both with and without specific reason	Without specific reason; e.g. regular meetings, general reporting or information-sharing	Only with specific reason (e.g. case of suspected corruption)	No contact	No. of agencies with contact without specific reason	At least once every six months	At least once a year
AA	2	0	1	0	1	1	1	0
BKM	18	5	7	3	3	12	6	6
BMAS	7	1	5	1	0	6	5	1
BMBF	1	0	1	0	0	1	1	0
BMEL	9	1	4	2	2	5	4	1
BMF	61	55	5	1	0	60	60	0
BMFSFJ	2	0	2	0	0	2	1	1
BMG	5	3	1	1	0	4	3	1
BMI	32	4	24	2	2	28	25	3
BMJV	7	0	5	1	1	5	4	1
BMU	7	2	3	1	1	5	4	1
BMVg	658	137	348	96	126	485	179	306
BMVI	54	40	8	3	3	48	43	5
BMW _i	8	4	2	1	1	6	4	2
BMZ	3	2	1	0	0	3	2	1
Total	874	254	417	112	140	671	342	329
Percentage share	100%	29%	48%	13%	16%			

Annex C Table 11 – Provision of information

Supreme federal authority	No. of agencies within remit with CPCP	Did the CPCP provide (initiate or participate in providing) information on corruption prevention in the reporting year?		In digital form (e.g. Intranet pages, newsletters, emails, video clips)		In analogue, written form		Information event(s)		Provision of other information	
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
AA	2	2	0	1	1	2	0	1	1	0	2
BKM	18	15	3	8	7	6	9	4	11	5	10
BMAS	7	6	1	6	0	1	5	1	5	3	3
BMBF	1	1	0	1	0	0	1	0	1	1	0
BMEL	9	8	1	7	1	1	7	2	6	2	6
BMF	61	61	0	60	1	53	8	56	5	50	11
BMFSFJ	2	2	0	2	0	0	2	1	1	1	1
BMG	5	5	0	5	0	3	2	3	2	3	2
BMI	32	32	0	29	3	24	8	26	6	16	16
BMJV	7	7	0	7	0	3	4	2	5	1	6
BMU	7	7	0	6	1	4	3	5	2	0	7
BMVg	658	643	15	658	0	260	398	93	565	165	493
BMVI	54	51	3	49	2	42	9	42	9	36	15
BMW _i	8	8	0	8	0	2	6	4	4	2	6
BMZ	3	3	0	3	0	1	2	2	1	1	2
Total	874	851	23	850	16	402	464	242	624	286	580

Annex C Table 12 – Corruption awareness measures, instruction and training

Supreme federal authority	No. of employees	No. of employees working in AEVC	No. of employees who took part in corruption awareness measures, instruction or training	% of employees who took part in corruption awareness measures, instruction or training	No. of employees in AEVC who took part in corruption awareness measures, instruction or training	% of employees in AEVC who took part in corruption awareness measures, instruction or training	Supervisory staff (excl. agency management) who took part in corruption awareness measures, instruction or training	Agency management who took part in corruption awareness measures, instruction or training	No. of employees who underwent training	% of employees who underwent training	No. of employees in AEVC who underwent training	% of employees in AEVC who underwent training	Supervisory staff (excl. agency management) who underwent training	Agency management who underwent training
AA	495	101	495	100%	101	100%	66	4	58	12%	53	52%	11	2
BKM	6,619	763	1,325	20%	156	20%	115	19	350	5%	33	21%	49	8
BMAS	39,465	3,825	4,751	12%	3,713	97%	134	6	207	1%	44	1%	0	0
BMBF	720	84	720	100%	84	100%	40	2	9	1%	1	1%	0	0
BMEL	7,421	558	2,143	29%	266	48%	232	5	168	2%	157	59%	8	0
BMF	60,281	6,405	24,423	41%	4,771	74%	1,189	53	1,956	3%	1,116	23%	293	12
BMFSFJ	1,399	429	262	19%	87	20%	35	1	36	3%	29	33%	2	0
BMG	3,710	1,032	2,262	61%	791	77%	161	5	155	4%	45	6%	51	1
BMI	68,844	13,077	38,229	56%	9,631	74%	3,416	160	4,704	7%	1,485	15%	1,249	73
BMJV	4,919	2,315	1,079	22%	411	18%	91	6	42	1%	35	9%	18	2
BMU	5,057	2,653	2,297	45%	1,619	61%	271	21	288	6%	78	5%	40	1
BMVg	235,296	7,010	139,702	59%	5,860	84%	7,956	808	3,922	2%	24	0%	52	12
BMVI	28,245	8,665	13,384	47%	5,306	61%	1,699	40	521	2%	359	7%	46	1
BMWi	9,566	2,580	4,520	47%	1,481	57%	412	7	1,405	15%	437	30%	128	3
BMZ	24,314	229	1,594	7%	25	11%	22	1	1,497	6%	25	100%	22	1
Total	496,351	49,726	237,186	48%	34,302	69%	15,839	1,138	15,318	3%	3,921	11%	1,969	116

Annex C Table 13 – Repeat corruption awareness measures, instruction and training

Supreme federal authority	No. of agencies within remit	How often are corruption awareness measures/instruction repeated in your agency for employees in AEVC?		How often are corruption awareness measures/instruction repeated in your agency for all other employees?	
		At regular intervals	Not repeated	At regular intervals	Not repeated
AA	2	2	0	2	0
BKM	20	11	9	12	8
BMAS	7	5	2	5	2
BMBF	1	1	0	1	0
BMEL	9	6	3	6	3
BMF	62	61	1	62	0
BMFSFJ	2	1	1	1	1
BMG	5	5	0	5	0
BMI	32	30	2	27	5
BMJV	7	6	1	6	1
BMU	7	5	2	5	2
BMVg	707	579	128	628	79
BMVI	54	51	3	51	3
BMW _i	9	8	1	8	1
BMZ	3	3	0	3	0
Total	927	774	153	822	105