



# THE HATVP

Twelve years dedicated  
to public integrity



**REVIEW &  
RECOMMENDATIONS**

Summary of the report submitted to the Prime Minister  
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for transparency in public life

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# Why drawing up a ‘comprehensive review’ twelve years after the creation of the High Authority?

**1. Both internationally and within our country, there is a growing awareness of the challenges surrounding integrity in public life, understood as the requirement that public officials and civil servants act in the public interest, free from any illegitimate, covert or malicious influence.**

According to the OECD, public integrity is ‘a strategic asset for governments and businesses. When well designed and effectively implemented, public integrity systems protect democracies from corruption, strengthen trust in public institutions, and support the conditions for growth and fair competition. Countries that seize this integrity advantage are better positioned to attract investment, manage risks and respond credibly to citizens expectations’.

With the very recent adoption of a European directive on combating corruption, the European Union now requires Member States to take ‘measures to ensure a high level of integrity, transparency and accountability in public administration and public decision-making with a view to preventing corruption’.

**2. It is therefore clearer than ever that genuine democracies are distinguished from all other political regimes by their approach to these issues of public integrity.**

One only has to observe how quickly, in Europe or elsewhere, democracies can be undermined if their foundations are eroded by corruption, unchecked conflicts of interest, a lack of transparency in decision-making, or foreign interference. **Nevertheless, the threats to the integrity of public life appear to be growing in the current geopolitical climate.** In the French National Anti-Corruption Plan (2025-2029), the Government highlights, in addition to the threats posed by the growth of drug trafficking, the risk of strategic corruption—namely, the fact that ‘states or organisations may indeed use corruption to obtain sensitive information or even hinder essential activities’.

**3. Fortunately, France has real strengths in this area, having implemented pioneering legislative reforms ensuring a strong position in international comparisons. A key milestone in the legislative reforms in this area was the creation in 2013 of the High Authority for transparency in public life, an independent administrative authority that takes its decisions impartially and collectively.**

Or, However, since its creation the High Authority has been entrusted at a steady pace with new responsibilities, which has required constant efforts to adapt in order to fulfil them. At the same time, the institutional landscape for the prevention of breaches of integrity has also expanded.

The intensity of this young organisation’s history alone thus called for a step back to assess the situation. Furthermore, twelve years after its creation, the body of rules it is responsible for enforcing is sometimes called into question or criticised. **Given the challenges associated with safeguarding public integrity, it is important that the mechanisms provided for by the legislator and implemented by the High Authority are fully effective, viable and credible.**

As president of the High Authority since April 2025, Jean Maïa wished, in the months following his appointment, to launch an initiative aimed at conducting a comprehensive review of the institution’s regulatory framework in light of the objectives successively assigned by the legislator. He did so after informing Prime Minister Sébastien Lecornu, who supported this initiative, as well as the president of the National Assembly, Yaël Braun-Pivet, and the president of the Senate, Gérard Larcher.

The aim of this report is therefore to provide the legislator with relevant information to help assess the merits of amending the regulatory framework governing the High Authority’s activities. It is driven by a desire to ensure that the High Authority can carry out its remit in the most effective manner, given the challenges involved in protecting and promoting the integrity of our public life.

## What was the method driving the drafting of this ‘comprehensive review’?

The process that led to this report drew on the High Authority’s own experience but, as this was deemed essential to ensure it was produced without bias, it also involved a very broad consultation process. The president of the High Authority was therefore intent on listening to and pondering all the views expressed: **more than forty organisations and individuals contributed to this discussion in a completely open and unrestricted manner.**

## What are the proposals ?

The report draws up **43 proposals**, some of which are cross-cutting in nature, while others relate specifically to the different missions of the High Authority.

### **CROSS-CUTTING PROPOSALS**

**① Rename the High Authority.** The report’s final proposal, which is not only symbolic, is that the ‘HATVP’ should be renamed the ‘High Authority for public integrity’. The sum of the tasks entrusted to the High Authority over the past twelve years places it in a position to provide citizens and public officials with guarantees of integrity in public life, which cannot be reduced to transparency alone.

Two additional proposals would enhance the effectiveness of the monitoring process and are integral to the adjustments or simplifications proposed below.

**② Make the penalty for failure to declare to the High Authority more effective.** The report proposes that the system of penalties that may result from the High Authority’s oversight be revised, so as to replace criminal penalties with a gradual system of periodic penalty payments and administrative sanctions, applicable exclusively in cases of failure to declare, which simply renders oversight impossible. Only a swift and effective response to this problem—the existence of which is beyond dispute—can ensure that it is addressed whilst public office is being held or whilst activities involving the representation of interests or foreign influence are taking place, so that the High Authority can intervene in good time.

**③ Extend the very limited right of access that the law granted to the High Authority in 2013 to cover all of its remit.** Both the diligence and the reliability of the checks carried out by the institution call for an extension of this right of access, which could be underpinned by a penalty payment mechanism, subject to the supervision of an administrative judge.

## PROPOSALS BY MISSION

4 In the area of oversight of public officials, the report emphasises that **streamlining and simplifying the system of disclosure requirements would be desirable**, both in terms of the usefulness of the disclosures for the oversight process itself and in terms of the burden placed on those controlled by the High Authority. It proposes, for example, to merge the declaration of assets and the declaration of interests into a single declaration.

5 If the rules governing the oversight of public officials were to be reviewed, the legislator could **reconsider the balance established in 2013 regarding the rules on the disclosure of declarations submitted to the High Authority**. Maintaining the current rules is certainly an option. However, the report concludes that it would be possible to adapt the forms of transparency regarding assets in order to mitigate those aspects that most infringe upon the right to privacy of the individuals concerned. A key condition is the effectiveness of the oversight exercised, which thereby reinforces the High Authority's role as a trusted third party between citizens and public officials.

6 In the area of monitoring revolving-door movements between the public and private sectors, given the uneven implementation of such regulation across the various parts of the public sector, there is an immediate need **to consolidate and strengthen a genuine network between the High Authority and the ethics officers within the public sector**. Targeted legislative measures could help to achieve this.

7 The feedback on which this comprehensive review is based also suggests that, in line with the recent reform of the definition of unlawful taking of interest under Article 432-12 of the Penal Code and with a view to ensuring security—which is the very essence of the preventive approach to monitoring career transitions— it would be valuable for the legislator to **reconsider certain elements of the definition of the offence of unlawful taking of interest in Article 432-13 of the Penal Code**. Said elements objectively lead to uncertainty and misunderstandings regarding the distinction between the public and private sectors.

8 In the area of regulating lobbying – where the objective of transparency has generally been achieved – **and foreign influence**, the changes identified through consultation as desirable, and on many of which there is broad consensus, would essentially serve to **clarify the applicable legal framework and refine it with regard to the integrity requirements imposed on lobbyists**. The amendments proposed in this report are primarily intended to ensure that the process the legislator wished to initiate is carried through to completion.