European Network for Public Ethics

# Position Paper of the European Network for Public Ethics on the EU Anti-Corruption Strategy

## *Towards a coherent European framework for corruption prevention*

**July 2026**

The European Network for Public Ethics (ENPE) brings together 19 authorities from European Union Member States active in matters of public integrity, alongside the European Ombudsman. Their missions involve maintaining the rule of law, fighting corruption and promoting good governance, which condition citizens' trust in their public officials. These authorities ensure in particular, within their States and under conditions of independence guaranteed by domestic law, the prevention of conflicts of interest in the public sphere, the regulation of revolving-door movements between the public and private sectors and the control of assets of public officials. ENPE serves as an operational cooperation network, enabling practitioners to exchange experience, develop common approaches and support the implementation of effective integrity policies across the European Union.

**Executive Summary**

**The ENPE welcomes the adoption of Directive (EU) 2026/1021 on combatting corruption and the renewed emphasis it places on corruption prevention as a core component of anti-corruption policy. As a European network bringing together national authorities with direct operational responsibilities for integrity oversight, public ethics and corruption prevention, ENPE offers a unique platform to support the implementation of the future EU Anti-Corruption Strategy.**

As the European Commission prepares the future EU Anti-Corruption Strategy, ENPE stands ready to serve as a strategic partner in the implementation of the Strategy's preventive dimension. ENPE considers that one of the main challenges facing corruption prevention in the European Union is the fragmentation of approaches across Member States. While national systems reflect different legal and administrative traditions, an ambitious European strategy will strengthen the coherence of national anti-corruption

policies and will enhance the overall effectiveness of the Union's anti-corruption framework.

ENPE therefore encourages the Commission to prioritise practical cooperation, common methodologies, guidance and the exchange of good practices in order to support convergence while fully respecting national competences. Strengthening the independence, powers and resources of public integrity and anti-corruption authorities is also crucial for the credibility of public action and citizens' trust in their national and European institutions.

**1. Corruption prevention as a strategic priority**

Directive (EU) 2026/1021 confirms the importance of prevention alongside investigation, prosecution and sanctions in the fight against corruption. The Directive establishes a comprehensive framework encompassing integrity, transparency, risk assessment, specialised anti-corruption bodies and stakeholder participation.

While Member States retain flexibility in organising their anti-corruption systems, preventing corruption and enhancing public integrity should be recognised as a distinct policy function requiring dedicated expertise, methodologies and long-term investment.

ENPE strongly supports this preventive approach and welcomes the recognition of the important contribution made by public ethics systems, integrity frameworks, civil society, academia and independent media in promoting accountability and public trust.

**2. Promoting greater coherence across the European Union**

Member States have developed a wide range of preventive mechanisms reflecting their respective constitutional, legal and administrative traditions. This diversity is both legitimate and valuable.

At the same time, significant differences remain in areas such as conflict-of-interest management, lobbying transparency, revolving-door monitoring, integrity systems, whistleblower protection frameworks, corruption-risk assessment methodologies, etc. Such variations may create challenges for the implementation of streamlined anti-corruption policies across the Union.

ENPE considers that the future EU Anti-Corruption Strategy offers an opportunity to strengthen cooperation and promote greater coherence among national preventive frameworks. The objective should not be harmonisation for its own sake, but the gradual development of common reference points that facilitate mutual learning, comparability and

effectiveness to ensure the functioning of the internal market and contribute to citizens' trust in their institutions. ENPE can help ensure that these strategies are developed on the basis of shared reference points and common lessons learned, rather than in isolated national silos.

Particular attention should be paid to the period preceding the transposition of Directive (EU) 2026/1021. During this phase, the European Commission should step up its efforts to facilitate cooperation, provide guidance and promote the exchange of good practices among Member States, particularly in the development of the national anti-corruption strategies required under the Directive. Early coordination would help ensure that national transposition processes benefit from shared experience and common approaches, thereby reducing fragmentation, promoting greater convergence and facilitating smoother cooperation and information exchange between Member States in the longer term.

To support these objectives, national anti-corruption strategies could be underpinned by minimum methodological standards, common monitoring and evaluation tools and a shared framework for assessing implementation at EU level. Such instruments would provide a common baseline of quality, consistency and comparability while preserving sufficient flexibility for Member States to adapt implementation to their institutional and legal specificities, as well as their existing national strategies and frameworks.

## 3. Recommendations for the future EU Anti-Corruption Strategy

### 3.1 Strengthening the institutional framework for corruption prevention

Anti-corruption and public ethics authorities should play a central role in these efforts. Owing to their operational expertise and direct responsibility for prevention and integrity oversight, they are uniquely placed to identify practical challenges, contribute to the development of common methodologies and facilitate the exchange of experience across jurisdictions. In this regard, the ENPE stands ready to support the European Commission by serving as a platform for cooperation, knowledge-sharing and the dissemination of good practices among national preventive anti-corruption and public integrity authorities.

The future EU Anti-Corruption Strategy should encourage Member States to establish and maintain a strong institutional framework for corruption prevention by ensuring that preventive anti-corruption and public integrity bodies benefit from clear legal mandates, operational and functional independence from political influence, and effective protection against undue interference, influence or external pressure. The EU Anti-Corruption Strategy should also promote the allocation of sufficient investigative and supervisory

powers within preventive mandates, together with the capacity to issue recommendations, monitor their implementation and engage proactively with public institutions.

Effective implementation of integrity and transparency standards requires sustained investment in institutional capacities and particularly the development of digital tools to enhance the ability of public authorities to detect risks, monitor compliance and analyse data. This should include granting anti-corruption and public ethics bodies direct access to the databases necessary to effectively carry out their preventive and monitoring mandates.

**3.2 Promoting transparency and accountability**

The future EU Anti-Corruption Strategy should promote transparency as a fundamental safeguard against corruption, including through effective access to information of public interest, transparent decision-making processes, and appropriate transparency of lobbying and interest representation activities. Transparency should also be reinforced through the proactive publication of implementation and evaluation reports, thereby strengthening accountability and public trust. Existing international benchmarks, including OECD indicators, could provide valuable guidance and contribute to more coherent and effective implementation across the Union.

**3.3. Building capacity and fostering a culture of integrity**

ENPE encourages the European Commission to support anti-corruption and integrity training and capacity-building efforts for public officials, elected officials and anti-corruption practitioners. This could include specialised introductory programmes for newcomers, thematic training sessions and opportunities for peer learning among Member States, thereby contributing to the development of a stronger and more consistent culture of integrity across the European Union.

Beyond professional training, the Strategy should promote a broader culture of integrity through integrity and ethics education, public awareness initiatives and cooperation with educational institutions. Strengthening integrity from an early stage contributes to democratic resilience, reinforces public trust and helps prevent corruption in the long term.

Given the EU's growing emphasis on prevention, youth engagement and democratic values, integrity education should form a dedicated pillar of the Strategy. The EU should build upon the momentum created by the adoption of UNODC Resolution 11/6, *"Strengthening education activities and programmes on ethical values, integrity and anti-corruption for children and young people as a significant pillar to prevent corruption and enhance trust in public institutions*", adopted at the 11. session of the COSP UNCAC last December in Doha,

which was also co-sponsored by the EU and the EU member states. The Resolution promotes the integration of integrity and anti-corruption education into school curricula and educational programmes, helping future generations develop resilience against corruption and unethical behaviour.

### 3.4. Ensuring sustainable funding and long-term implementation

The sustainability of anti-corruption policies also requires stable and predictable multi-annual funding. The future EU Anti-Corruption Strategy should encourage better coordination between EU and national funding mechanisms in order to support long-term implementation, strengthen public impact and reduce reliance on *ad hoc* financing arrangements.

### 3.5. Developing practical tools and guidance at EU level

ENPE encourages the European Commission to support Member States through the development of practical tools and guidance, including:

- common methodologies for corruption-risk assessment;
- guidance on integrity management and conflict-of-interest prevention;
- guidance on establishing and fostering a culture of integrity;
- platforms for exchanging good practices among public integrity, ethics and anti-corruption bodies;
- capacity-building initiatives for institutions responsible for prevention and integrity oversight;
- common reference frameworks promoting transparency, accountability, integrity and ethical governance.

By providing a common framework for action, these instruments can support national reforms, strengthen implementation of existing EU legislation and contribute to greater coherence across the Union.

### Conclusion

Effective corruption prevention also requires the active involvement of stakeholders beyond public administrations. Civil society organisations, academia, professional associations, the private sector and independent media all play an important role in promoting integrity, accountability and public scrutiny. The future Strategy should therefore encourage structured cooperation between public authorities and these actors in the design, implementation and evaluation of anti-corruption policies.

ENPE believes that the future EU Anti-Corruption Strategy can make a significant contribution to strengthening corruption prevention by fostering cooperation, mutual learning and convergence of practices across Member States.