

## EuroPAM in-law indicators on Financial Disclosure

<http://europam.eu>

EuroPAM is a primary data collection effort that produces assessments of in-law and in-practice efforts to enhance the transparency of public administration and the accountability of public officials. It is part of an EU-funded digital whistleblowing project (DIGIWHIST) that aims to improve trust in governments and efficiency of public spending across Europe.

The purpose of requiring financial disclosure of public officials depends on the aim of the overall accountability regime. When focusing on conflict of interest, disclosures can be used to identify potential bias in public activities. For regimes that aim to prevent illicit enrichment [and to punish public officials for improper behavior], disclosures may be used to identify assets or incomes that are not attributable to salary, gift, or loan. Both types of disclosure regimes aim to prevent the occurrence of financial misconduct in public office, such as bribery or theft, while also maintaining records of the financial activities of public officials for future use in prosecution.

Financial Disclosure	
Qual-1	<b>Head of State</b>
Qual-2	<b>Disclosure items</b>
Qual-3	Spouses and children included in disclosure
Qual-4	<b>Income and Assets</b>
Qual-5	Real estate
Qual-6	Movable assets
Qual-7	Cash
Qual-8	Loans and Debts
Qual-9	Income from outside employment/assets
Qual-10	<b>Incompatibilities</b>
Qual-11	Gifts received as a public official
Qual-12	Private firm ownership and/or stock holdings
Qual-13	Ownership of state-owned enterprises (SOEs)
Qual-14	Holding government contracts
Qual-15	Board member, advisor, or company officer of private firm
Qual-16	Post-employment
Qual-17	Simultaneously holding policy-making position and policy-executing position
Qual-18	Participating in official decision-making processes that affect private interests
Qual-19	Concurrent employment of family members in public sector
Qual-20	<b>Filing frequency</b>
Qual-21	Filing required upon taking office
Qual-22	Filing required upon leaving office
Qual-23	Filing required annually
Qual-24	Ad hoc filing required upon change in assets or conflicts of interest
Qual-25	<b>Sanctions</b>
Qual-26	Sanctions stipulated for late filing (fines, administrative, and/or criminal)

Qual-27	Sanctions stipulated for non-filing (fines, administrative, and/or criminal)
Qual-28	Sanctions stipulated for false disclosure (fines, administrative, and/or criminal)
Qual-29	<b>Monitoring and Oversight</b>
Qual-30	Depository body explicitly identified
Qual-31	Enforcement body explicitly identified
Qual-32	Some agency assigned responsibility for verifying submission
Qual-33	Some agency assigned responsibility for verifying accuracy
Qual-34	<b>Public access to declarations</b>
Qual-35	Public availability
Qual-36	Timing of information release specified
Qual-37	Location(s) of access specified
Qual-38	Cost of access specified
Qual-39	<b>Ministers</b>
Qual-40	<b>Disclosure items</b>
Qual-41	Spouses and children included in disclosure
Qual-42	<b>Income and Assets</b>
Qual-43	Real estate
Qual-44	Movable assets
Qual-45	Cash
Qual-46	Loans and Debts
Qual-47	Income from outside employment/assets
Qual-48	<b>Incompatibilities</b>
Qual-49	Gifts received as a public official
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Qual-63	<b>Sanctions</b>
Qual-64	Sanctions stipulated for late filing (fines, administrative, and/or criminal)
Qual-65	Sanctions stipulated for non-filing (fines, administrative, and/or criminal)
Qual-66	Sanctions stipulated for false disclosure (fines, administrative, and/or criminal)
Qual-67	<b>Monitoring and Oversight</b>

Qual-68	Depository body explicitly identified
Qual-69	Enforcement body explicitly identified
Qual-70	Some agency assigned responsibility for verifying submission
Qual-71	Some agency assigned responsibility for verifying accuracy
Qual-72	Public access to declarations
Qual-73	Public availability
Qual-74	Timing of information release specified
Qual-75	Location(s) of access specified
Qual-76	Cost of access specified
Qual-77	<b>Members of Parliament</b>
Qual-78	Disclosure items
Qual-79	Spouses and children included in disclosure
Qual-80	<b>Income and Assets</b>
Qual-81	Real estate
Qual-82	Movable assets
Qual-83	Cash
Qual-84	Loans and Debts
Qual-85	Income from outside employment/assets
Qual-86	<b>Incompatibilities</b>
Qual-87	Gifts received as a public official
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Qual-94	Participating in official decision-making processes that affect private interests
Qual-95	Concurrent employment of family members in public sector
Qual-96	Filing frequency
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Qual-100	Ad hoc filing required upon change in assets or conflicts of interest
Qual-101	Sanctions
Qual-102	Sanctions stipulated for late filing (fines, administrative, and/or criminal)
Qual-103	Sanctions stipulated for non-filing (fines, administrative, and/or criminal)
Qual-104	Sanctions stipulated for false disclosure (fines, administrative, and/or criminal)
Qual-105	Monitoring and Oversight
Qual-106	Depository body explicitly identified
Qual-107	Enforcement body explicitly identified

Qual-108	Some agency assigned responsibility for verifying submission
Qual-109	Some agency assigned responsibility for verifying accuracy
Qual-110	<b>Public access to declarations</b>
Qual-111	Public availability
Qual-112	Timing of information release specified
Qual-113	Location(s) of access specified
Qual-114	Cost of access specified
Qual-115	<b>Civil servants</b>
Qual-116	<b>Disclosure items</b>
Qual-117	Spouses and children included in disclosure
Qual-118	<b>Income and Assets</b>
Qual-119	Real estate
Qual-120	Movable assets
Qual-121	Cash
Qual-122	Loans and Debts
Qual-123	Income from outside employment/assets
Qual-124	<b>Incompatibilities</b>
Qual-125	Gifts received as a public official
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Qual-143	<b>Monitoring and Oversight</b>
Qual-144	Depository body explicitly identified
Qual-145	Enforcement body explicitly identified
Qual-146	Some agency assigned responsibility for verifying submission
Qual-147	Some agency assigned responsibility for verifying accuracy
Qual-148	<b>Public access to declarations</b>

Qual-149	Public availability
Qual-150	Timing of information release specified
Qual-151	Location(s) of access specified
Qual-152	Cost of access specified