

# Anti-corruption Action Plan 2021–2025

---

## Objective

---

1. The prevention of corruption in Estonia has been guided by three anti-corruption action plans, the most recent of which covered the period 2013–2020. The objectives of the previous anti-corruption strategy were to promote awareness of corruption, increase the transparency of decision-making and activities, develop the investigative capacity of investigative bodies, and prevent corruption which threatens security.
2. In general, the goals that are to be set for anti-corruption policy have remained the same now; however, the agenda for trying to fulfil these objectives needs to be updated. The objective of this action plan is to highlight the most important short-term activities which will contribute to the achievement of the objectives. Areas of focus include:
  - 2.1. **Transparency of state activities:** the legislative process and the action of influencing it, anti-corruption legislation, public procurements and grants, availability of data, and risk assessment;
  - 2.2. **Transparency of local government activities:** internal control systems and plans, building permits;
  - 2.3. **A fair business environment:** awareness of entrepreneurs and activities of public (state/local government) companies;
  - 2.4. **Awareness:** youth, companies, and the public sector (incl. members of municipal councils);
  - 2.5. **Protection of whistleblowers:** adoption and implementation of the law;
  - 2.6. **Sectoral transparency:** environment, healthcare, welfare, sport;
  - 2.7. **Investigation of corruption offences:** investigation of both corruption and related offences;
  - 2.8. **Impact assessment of anti-corruption policies:** sectoral studies.
3. This action plan was prepared under the leadership of the Ministry of Justice in cooperation with the anti-corruption network. This action plan is not final and can be supplemented by new activities on an ongoing basis. The action plan is approved by the Government of the Republic.
4. The implementation of the action plan is coordinated by the Ministry of Justice through the anti-corruption network, to which each ministry and the agency responsible for the implementation of the action plan will appoint a representative. Each agency is responsible for performing activities assigned to it in the action plan. The anti-corruption network consists of anti-corruption contacts of the ministries and representatives of the partners (Police and Border Guard Board, National Audit Office, Transparency International Estonia, Estonian Chamber of Commerce and Industry, etc.). The aim of the network is to develop and share best practices, support cooperation and mutual learning, and exchange experiences in addition to monitoring the activities agreed upon in the action plan. To implement the action plan more successfully and create more resonance in various sectors, local governments, and the private sector, membership of the network must be expanded, and a strategic partnership must be developed.
5. The precondition for the implementation of the action plan is the availability of the corresponding funds in the budget and, if necessary, applying for additional funds.
6. The impact of the action plan is measured through the use of official statistics (number of registered crimes and proceedings), experiences and assessments of Estonian people (exposure to various forms of corruption, spread of corruption by sector, etc.), and use of international assessments (Transparency International, EN-GRECO, EU, OECD, UN).

---

### *Current activities and their impact*

---

7. The impact of the activities of the current anti-corruption strategy was last thoroughly assessed in 2017<sup>1</sup>. The effectiveness of the strategy and the impact of anti-corruption activities are also continuously assessed through surveys and international recommendations and evaluations. **The number of registered corruption offences has decreased by 77% when compared to 2013**, and the number of processed criminal cases has also decreased by 48%. The decrease in registered crime statistics is largely due to the fact that previously, many crimes related to the same criminal case were registered (e.g. cases related to the testing of roadworthiness of vehicles, where repeated bribery offences of one person were registered separately), but no such criminal cases have occurred in recent years.
8. One of the objectives of the anti-corruption strategy in effect for 2013–2020 was to increase the capacity of the government to prevent corruption. One of the indicators for achieving this objective was the residents' assessment of the state's anti-corruption activities. According to the 2012 Eurobarometer survey, 32% of Estonians are of the opinion that the government's anti-corruption efforts are effective. According to the 2017 survey, this figure had risen by 2% with 34% of the population being of the opinion that the state's efforts were effective<sup>2</sup>, while in 2020, this indicator had fallen back to the level of 2012<sup>3</sup>.

---

<sup>1</sup> [https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumendid/korruptsioonivastase\\_strateegia\\_vaehendamine.pdf](https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumendid/korruptsioonivastase_strateegia_vaehendamine.pdf)

<sup>2</sup> Special Eurobarometer, Corruption Report October 2017 URL: [file:///C:/Users/katlin.kruusmaa/Downloads/ebs\\_470\\_en.pdf](file:///C:/Users/katlin.kruusmaa/Downloads/ebs_470_en.pdf), p. 64

<sup>3</sup> Special Eurobarometer, Corruption Report 2020, p. 84  
[file:///C:/Users/katlin.kruusmaa/Downloads/ebs\\_502\\_report\\_en.pdf](file:///C:/Users/katlin.kruusmaa/Downloads/ebs_502_report_en.pdf)

9. **According to the Ministry of Justice's victim survey (2019), people's exposure to corruption has decreased.** Most people have not provided officials with a bribe: 4% of the respondents to the victim survey had paid a bribe, provided a favour in return, or brought a gift to an official; 4% of people knew someone else who had done so.<sup>4</sup> The corruption survey (2017) also suggests that people's awareness of corruption has overall improved and that their susceptibility to corruption has decreased – in a hypothetical situation, less than a third of respondents thought that they would pay a bribe (27%), compared to 10 years ago, when that figure was almost one and a half times as high (44%). Corruption is not seen as a major societal concern; it is, however, considered especially widespread to be for buying laws and winning public procurements.
10. Estonia set an objective in the anti-corruption strategy in 2013 that would see the country **reach the group of the countries with the lowest perceived levels of corruption in the Transparency International's Corruption Perceptions Index** (the value of the index must be higher than 64 points), and this goal was indeed achieved. Estonia scored 74 points in February 2020, ranking Estonia 18th among 180 countries<sup>5</sup>. Estonia outperformed many countries of the European Union in this index score, including France (23rd place), Portugal (30th place), and Spain (30th place). In the meantime, other indicators of transparency have been created to describe the transparency of state administration, Estonia ranks rather well in those metrics as well – for example, the Index of Public Integrity<sup>6</sup> puts

<sup>4</sup> Crime in Estonia in 2019. URL of the Ministry of Justice: <https://www.kriminaalpoliitika.ee/kuritegevuse-statistika/korruptsioon.html>

<sup>5</sup> The Corruption Perceptions Index ranks countries according to their perceptions of public sector corruption. The index ranks countries on a 100-point scale. 0 indicates a high level of perceived corruption, while a maximum score of 100 is given to a country which is perceived to be free of corruption. See [www.transparency.org](http://www.transparency.org)

<sup>6</sup> <https://integrity-index.org/>

Estonia in 12th place. We stand out positively in terms of our budget transparency and freedom of the press.

11. Estonia is in a fairly good position in terms of complying with the recommendations of the Council of Europe's **GRECO** body. Estonia ranks fifth among GRECO states in implementing the recommendations – Estonia had implemented 74% of the recommendations given to Estonia in the fourth evaluation round, which has contributed to increasing the transparency of the activities of the prosecutor's office, the courts, and the parliament.<sup>7</sup> The fifth evaluation round is ongoing with the recommendations of that round concerning the prevention of corruption of high-level officials and of the police.

12. Estonia has also received positive feedback in the **EU Rule of Law Report**<sup>8</sup>, where the recommendation has been given that we should introduce regulation on whistleblower protection and ensure the transparency of lobbying and public procurements.

13. Some of the most important activities to have increased transparency over the last seven years:

13.1. **To develop anti-corruption attitudes and raise awareness in the public sector:** Numerous trainings have been conducted primarily for the employees of local governments and the healthcare and education sectors, [online training has also been developed on the topics of corruption and conflicts of interest](#)<sup>9</sup>.

13.2. **To raise the awareness of companies and to increase business transparency,** corruption issues were included in the Corporate Social Responsibility Index, a business corruption survey was conducted, and a number of tools were developed to assess corruption risks in the private

sector, such as [the easy self-assessment questionnaire for the company](#), and [the Mythbuster for Companies](#), the anti-corruption ISO standard was also translated and promoted. Additionally, Transparency International Estonia (MTÜ Korruptsioonivaba Eesti) has initiated a fair business network.

13.3. **To formulate the attitudes of the youth in terms of corruption,** corruption-related classes have been conducted in schools in cooperation with universities (university students trained by the Ministry of Justice have held guest lectures for high school students) and about 1,000 young people – mainly Estonian, but also Russian youth – have been reached. An analysis of university curricula is also being conducted, as a result of which the topics of business ethics, corruption, and financial crime will be integrated into the curricula of business specialities.

13.4. **To increase the transparency of work organisation at local governments,** efforts have been made to support the establishment of internal control systems, e.g. [an online environment for corruption risk assessment](#) was created, guidelines for corruption prevention and development of internal control systems were issued, and the local government staff were trained to create an internal control system.<sup>10</sup>

13.5. **To increase the transparency of the activities of state institutions and to prevent corruption and influence in law and defence agencies and courts,** thorough mapping of corruption risks was conducted in the fields of education, culture, and environment, leading to changes in procedures (procedures and trainings were implemented to prevent conflicts of interest, etc.); changes were implemented in matters relating to roadworthiness tests of vehicles and applications for driving licences to make the processes more corruption-proof and establish procedures/codes/training to prevent conflicts of interest in the police,

---

<sup>7</sup> <https://www.rferl.org/a/fighting-graft-in-government-institutions/30654809.html>

<sup>8</sup> [https://ec.europa.eu/info/publications/2020-rule-law-report-communication-and-country-chapters\\_en](https://ec.europa.eu/info/publications/2020-rule-law-report-communication-and-country-chapters_en)

<sup>9</sup> As at November 2020, more than 600 public sector employees had passed the test in hitsa.moodle, in addition to this figure, there are also a number of institutions who have

passed the test in the moodle for institutions. The YouTube videos have been viewed thousands of times.

<sup>10</sup> See [the guidelines for the organisation of the internal control system for local governments](#) and [the establishment of internal control and corruption prevention for local governments](#)

prosecutor's office, and courts; the government sector's financial activities' portal riigiraha.fin.ee was developed enabling to get a better overview of public sector expenditures. Additionally, an initial analysis was conducted with the participation of the anti-corruption contact network to systematically assess the corruption risks of senior officials and to share best practices in preventing conflicts of interest.

13.6. **To increase the transparency of public procurements:** electronic public procurements were introduced, incl. electronic information exchange, which also allows monitoring communication during the procurement process; a requirement was also introduced to confirm the absence of conflicts of interest in the public procurement process.

13.7. **To increase the transparency of spatial planning:** digital developments have been created to facilitate data access and to increase transparency in the field. The end of the year 2019 saw uniform requirements being introduced for all the established plans, which form the basis for all other digital developments in the field (unified data repository, possible information system for procedures, ex-post digitisation of previously established plans). New general plans are being prepared in local governments, which in most local governments establish land use and construction rules of more clarity. Guidelines for public procurements in spatial planning were prepared, specialists in the field were trained and instructed<sup>11</sup>. The Green Paper on Spatial Planning completed in 2020<sup>12</sup> and the Praxis and AB Trinity study commissioned in cooperation with the Government Office found that an uneven practice is in use in local governments regarding the so-called 'social infrastructure charges' (the current practice may not ensure equal treatment of the interested parties; agreements are not always easily available for use).

13.8. **To increase the transparency of grant decisions:** agencies providing grants have been involved in mitigating the risk of corruption. The agencies dealing with the distribution of structural funds under the administration of several ministries have rules for avoiding conflicts of

interest, anti-corruption work organisation rules have also been established; this includes, among other matters, the obligation to resign, the strengthening of the role of the internal auditor, extended public procurement obligations, etc.

13.9. **To increase the transparency of healthcare,** a nationwide digital register and a patient portal have been developed, the latter of which enables the insured person to receive an overview of the expenses for their treatment by treatment case on the patient portal. The submission of 'unfounded health certificates' in criminal proceedings was changed so that the court would decide on the justification for the person being absent from the hearing, involving a forensic doctor, if necessary. Training was also provided in larger hospitals with internal regulation being adopted to prevent conflicts of interest (East Tallinn Central Hospital, West Tallinn Central Hospital, North Estonia Medical Centre).

13.10. **To develop the investigative capacity of investigative institutions and to prevent corruption threatening security,** the capacity to identify proceeds from crime has been strengthened (e.g. financial analysts are employed in the prosecutor's office) and an investigative analysis-based capacity was developed. Overall, however, the number of criminal cases related to corruption offences has decreased year by year: in 2012, approximately 100 criminal cases concerning corruption were processed per year, and today, approximately 50<sup>13</sup> cases have been processed – this figure involves cases wherein corruption offences have been registered.

---

*The situation today: bottlenecks*

---

**Transparency of state activities**  
The legislative process, incl. lobbying

---

<sup>11</sup> [https://www.rahendusministeerium.ee/sites/default/files/Regionaalareng\\_poliitika/soo\\_vitused\\_ruumilise\\_planeerimise\\_hangete\\_labiviimiseks\\_2018-02-26.pdf](https://www.rahendusministeerium.ee/sites/default/files/Regionaalareng_poliitika/soo_vitused_ruumilise_planeerimise_hangete_labiviimiseks_2018-02-26.pdf)

<sup>12</sup> <https://planeerimine.ee/static/sites/2/ruumilise-planeerimise-roheline-raamat.pdf>

<sup>13</sup> <https://www.kriminaalpoliitika.ee/kuritegevuse-statistika/korruptsioon.html>

14. Although the Estonian legislative process can, in general, be described as transparent and inclusive, then according to the corruption survey (2017), residents are of the opinion that laws are being purchased in a widespread manner with corruption in public procurement also being commonplace. One of the concerns is the possible influence of lobbyists on laws and other decisions of public authorities, which is not completely transparent. Today, the concept of lobbying is not defined in Estonia and there is no information about meetings with lobbyists. In a democratic society, everyone has the right to have their interests represented; the society, in turn, has the right to know who, by what means, and for what purpose is influencing policymaking and to what extent these views have been considered. There are also no generalised guidelines for conflicts of interest for senior officials (ministers and political advisers). Having a guide to avoiding conflicts of interest would mean having a set of ethical principles for ministers and their advisers to help prevent corruption. These would be guidelines creating a culture of transparency, the violation of which would not see sanctions being applied, although officials are expected to be aware of them and to comply with these principles – GRECO<sup>14</sup>, too, is expecting Estonia to establish those guidelines.

15. When drafting a draft act, the various possible effects that arise as a result of the proposed regulation or changes are assessed quite thoroughly in today's Estonia – the control questionnaire can be used to identify social, economic, environmental, and other effects<sup>15</sup>. At the same time, we have not yet had an assessment of the possible corrupt effects of the draft legislation, even though this measure is mainly used by countries which have higher levels of corruption than Estonia<sup>16</sup>. The intention is to lay the groundwork for analysing the impact of the draft act also on transparency in the framework of the proposed action plan.

---

<sup>14</sup> <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680900551>

<sup>15</sup> [https://www.just.ee/sites/www.just.ee/files/elfinder/article\\_files/mojude\\_hindamise\\_metoodika.pdf](https://www.just.ee/sites/www.just.ee/files/elfinder/article_files/mojude_hindamise_metoodika.pdf)

### Anti-corruption Act

16. The Anti-corruption Act has been in force from 2013 and it has been amended several times over the last seven years. According to the assessment of GRECO, the Estonian Anti-corruption Act is versatile, supplemented by guidelines and study materials<sup>17</sup>. However, the implementation of the law has revealed bottlenecks which should be analysed within the action plan and for the solution of which, as a part of this analysis, measures should be developed. Among these issues is the need to clarify the borders for the definition of an official (e.g. when does a doctor become an official) and the scope of the definition for a related party and a procedural restriction (e.g. now, an official is not considered a related party if the relationship arises from the official duties of the official, e.g. being a representative in the supervisory board of a company; it should, however, be analysed if the regulation now is sufficient and whether it meets real-life needs). It is also necessary to analyse the scope of control over compliance with the obligations arising from clause 3 (3) 2) of the Anti-corruption Act, considering that based on today's interpretation, control is primarily seen as the functioning of the institution's internal control (and not the total control of the individual) ensuring people's awareness of the anti-corruption steps, etc. If necessary, the appropriate legislative amendments and/or guidelines must be developed.

### Public procurements and grants

17. About 98% of public procurements in Estonia are organised electronically, which has increased the transparency of public procurements. It is the opinion of the Estonian Chamber of Commerce and Industry that

<sup>16</sup> [http://rai-see.org/wp-content/uploads/2015/06/Comparative\\_Study-Methodology\\_on\\_Anti-corruption\\_Assessment\\_of\\_Laws.pdf](http://rai-see.org/wp-content/uploads/2015/06/Comparative_Study-Methodology_on_Anti-corruption_Assessment_of_Laws.pdf)

<sup>17</sup> <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680900551>

companies still perceive the conditions of public procurement as ostensible from time to time. Disclosure of decision-makers in procurement procedures would help increase transparency. Even though it is now possible to enter evaluators of procurements in the Public Procurement Register, this is not mandatory. Submitting the names (personal identification codes) of the members of the evaluation committees to the register would enable to display the connections between the decision-makers and the winner of the procurement procedure (see also 'Data and its availability'). Mandatory registration of the names of the members of the evaluation committees in the Public Procurement Register and making them available as open data after the procurement requires the amendment of the Public Procurement Act as well as making developments to the Public Procurement Register.

18. In addition, it is possible to make the procurement process more transparent for small purchases (goods and services valued at less than €30,000, construction works valued at less than €60,000) without increasing bureaucracy – this requires organising such purchases through the Public Procurement Register. Greater use of the Public Procurement Register for small purchases requires the introduction of a corresponding requirement in the procurement procedures of institutions and the introduction of possibilities of the Public Procurement Register to the contracting authorities, while also making the Public Procurement Register more user-friendly.

#### Data and its availability

19. Making data in different registers available as open data and linking this data together generally increases the transparency of processes. For example, by linking together data available in different state information systems, it would be possible to identify the transactions which have potential conflicts of interest (e.g. by way of linking together data from the Public Procurement Register, the Commercial Register, and the balance

record information system to increase the transparency of transactions) and create automatic alert systems. By now, the application opener.ee has been partially completed, which combines various data together (creates links between donors of political parties, members of the councils of state enterprises and foundations, and the latest successful public procurements). It should be further developed by way of adding data as well as functionality.<sup>18</sup>

20. Data exchange and cooperation would also help increase transparency, especially for EU grants. Today, there is no central overview of the beneficiaries available in the field of grants (who has received a grant and for what purpose); this, in turn, creates a favourable environment for the double funding of projects. A broader exchange of data would help to prevent this. Today, there is also no cooperation between the authorities awarding the grants, which could be improved by designating a central authority that would, among other things, coordinate the communication between different donors, exchange of data, etc. It is necessary to ensure the integrity of the data so that it would be possible to analyse information from various databases concerning grants in a machine-readable form.
21. The availability and interoperability of data could make the handling of corruption and finance crimes, such as benefit frauds, more efficient. To prevent money laundering and its predicate offences, legal persons governed by private law have an obligation to keep and collect relevant data on beneficial owners, which also requires the development of a register of beneficial owners. Developments of the Commercial Register are also needed, which would enable the consolidation of information concerning companies in the Commercial Register, its visualisation, and the consumption of information in other systems to be used by way of accessing the information through links.

#### Risk assessment and mitigation

---

<sup>18</sup> It must also be taken into account that, e.g. when making the data of the Commercial Register available as open data, there is a need for additional financing.

22. It is the opinion of GRECO that senior officials (especially ministers and political advisers) have received disproportionately little attention in terms of corruption prevention and raising awareness of corruption – they do not have a specific code of conduct on preventing conflicts of interest (code), they have also not received special advice or training (see also clause 14); at the same time, their decisions have a great influence and they play a crucial role through leading by example. Although sectoral corruption risks are assessed with a certain regularity in Estonia, these assessments do not include the corruption risks of senior officials, this implies that there is a need to systematically assess such risks, also including senior officials in that assessment. The National Audit Office<sup>19</sup> has recommended that the Ministers of Justice and of Public Administration should explain to agencies the need to assess corruption risks and that they would propose suitable practices for doing so. Among other matters, the guidance material ‘Risk Management’ prepared by the Ministry of Finance in 2013<sup>20</sup> also needs to be updated.

23. The general rule of the Public Service Act is that a vacant position in the public service is filled by way of public competition; in certain cases, internal competition is allowed and there are certain positions which can be filled without a competition (section 16 of the Public Service Act) – such exceptions have, for example, been made in Estonia for the positions of the Director General of the Police and Border Guard Board, Director General of the Rescue Board and Emergency Response Centre, and the Prosecutor General. GRECO has made the recommendation that the procedure for the election and appointment of the Director General of the Police and Border Guard Board should ensure that the principles of competition and transparency are considered for all candidates. This means that a public competition is an integral part of a transparent and professional civil service, helping to find candidates with very high ethical and executive management competencies. Therefore, the action plan must aim for the appointment of the heads of government agencies based on a

transparent and open competition, especially in those agencies where there currently is no legal obligation to hold a public competition.

### Transparency of local government activities Strength of the internal control system

24. A well-functioning internal control system helps to prevent corruption and is an integral part of transparent management. The internal control system includes procedures, instructions, etc. for the lawful operation of the organisation (e.g. procedures for awarding grants and conducting procurements, awareness of corruption among employees). The internal control system should not be confused with an internal audit, which is responsible for assessing the adequacy, purpose, and legality of resources, activities, and decisions. Improving the efficiency of the internal control system requires significant attention and state support in many local governments. Although the guides for the organisation of the local government’s internal control system have been completed and supporting trainings have taken place, many local governments must continue to be supported in developing and training their internal control system – the field is wide and there is no single solution that would be suitable for all local governments. One of the solutions for improving the efficiency of the internal control system is to obligate the local governments to conduct internal audits.

25. A significant part of corruption prevention is related to raising awareness (72 corruption crimes were registered in 2019, 33% of those crimes took place in local governments), which is why awareness about corruption risks in their work must be raised among local government employees, the government, and council members and explanations must be provided on why there is a need for an internal control system. The need for continuous guidance was also indicated by a survey conducted in the spring of 2020 among local government leaders – this survey pointed out, for example, that additional knowledge is needed about participation in the work of

<sup>19</sup> Control report: Accuracy of the state annual accounts for 2018 and the legality of transactions

<sup>20</sup> [https://www.rahandusministeerium.ee/et/system/files\\_force/document\\_files/riskijuhimine.pdf?download=1](https://www.rahandusministeerium.ee/et/system/files_force/document_files/riskijuhimine.pdf?download=1)

local government companies, foundations, and about procedural restrictions, etc.<sup>21</sup>

### Plans and building permits

26. The processing of plans and the issuance of building permits is an area with a wide margin for discretion and extensive local government autonomy, where it is not always possible to objectively determine what the purpose of the land should be or how many floors should the house being built have. The decisions made have an economic impact on both companies and private persons, there are many parties involved, proceedings involve many coordinators, and they are voluminous in nature. Therefore, the processing of plans and the issuance of permits, making various decisions regarding the purposes, volumes, accesses, and other accompanying infrastructure of the proposed buildings are a favourable ground for cases of corruption. The substantive correctness of the local government's consideration cannot be verified in the course of state supervision or judicial review, i.e. the court can assess the conduct of the proceedings, not the suitability of the chosen solution. The Green Paper on Spatial Planning<sup>22</sup>, which was completed in 2020, highlights that planning is perceived as an activity with a high risk of corruption, and that there have been cases in that field of activity. With regard to spatial planning, the Green Paper proposes solutions that will be implemented in the framework of developing spatial planning policies and practices. It is acknowledged that there still remains a certain risk of corruption due to the wide margin of discretion inherent to the sector.
27. Agreements with developers (e.g. the entity building the infrastructure, ways of contributing to the construction of kindergartens, etc.) are not based on a clear legal framework; this information and these agreements

are also often not public. Based on an analysis of local benefit instruments and tolerance interests<sup>23</sup>, regulations and guidelines need to be developed in the field of planning to ensure greater transparency, legal clarity, and equal treatment. As of the end of 2020, corresponding legislative changes are being prepared in the field of spatial planning. IT developments have also been initiated, which will help make the construction and planning sector more transparent.

### A fair business environment

#### Prevention of business corruption

28. The awareness of companies of business corruption is low, which means that the companies do not have an awareness of different forms of business corruption and the companies are unable to see themselves being a victim or notice the possible consequences of a corruptive act. Some types of business corruption are not considered corrupt acts, such as transaction fees<sup>24</sup> or favouring friends and acquaintances in the procurement process<sup>25</sup>. The role of the state in preventing business corruption can be primarily considered to involve raising awareness and motivating the fair conduct of business: this way, the state can explain the nature and impact of transaction fees and conflicts of interest on the business environment, as well as the importance of avoiding competition violations – companies' awareness of how the market functions and the rules which help prevent more serious cases. The state can also motivate companies to act responsibly and sustainably.
29. Auditors are able to detect cases of corruption in the course of their work, but due to the confidentiality conditions of the contracts entered into with the clients, they often do not inform the police. Instead, they inform the client, assuming that the client will inform the police themselves. At the same time, the client does not want to report the damage to the police for

<sup>21</sup> [https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumentid/o\\_mavalitsuste\\_kusitlus.pdf](https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumentid/o_mavalitsuste_kusitlus.pdf)

<sup>22</sup> <https://planeerimine.ee/static/sites/2/ruumilise-planeerimise-roheline-raamat.pdf>

<sup>23</sup> [https://www.riigikantselei.ee/sites/default/files/riigikantselei/strateegiaburoo/taluvush\\_uvi\\_mojuanaluusi\\_lopparuanne.pdf](https://www.riigikantselei.ee/sites/default/files/riigikantselei/strateegiaburoo/taluvush_uvi_mojuanaluusi_lopparuanne.pdf)

<sup>24</sup> So-called kickback.

<sup>25</sup> See e.g. <https://www.korruptsioon.ee/et/privatecorruptionstudy>.

reasons of reputational damage, etc. This way, both smaller and larger cases of corruption in the private sector may remain undetected, which is why auditors need to be included in information activities as a target group.

30. The purpose of annual reports is to provide an overview of the financial position, financial performance, and cash flows of the accounting entity. Each year, approximately 60% of the companies and other accounting entities submit their annual reports on time, 20% submit the report with a delay, and 20% of the entities do not submit the report at all. To increase the transparency of the business environment, state supervision must be strengthened and companies and other accounting entities should be 'nudged' to submit their reports correctly and in a timely manner.

#### State and local government companies and foundations

31. The Appointments Committee, which has been active since 2017, has improved the governance of state-owned companies. At the initiative of the Appointments Committee, self-assessments of the supervisory boards have been conducted from 2018, helping to identify bottlenecks in the activities of the supervisory boards and companies, drawing attention of the chairman of the supervisory board and the respective secretary general to preventing and resolving problems. According to the Ministry of Finance, based on previous assessments, it is possible to conclude that the supervisory boards are professional in their work, systematically organising and supervising the strategic management of companies. The Appointments Committee has contributed to enhancing the competence of the supervisory boards and preventing nepotism (political corruption); attention should, however, be turned to ensuring that the selection process for members of supervisory boards of state-owned companies

remains transparent and based on expertise and experience<sup>26</sup>. The Ministry of Finance together with the University of Tartu published a handbook<sup>27</sup> for members of the supervisory boards of state-owned companies and foundations in 2017 to better organise their work, also organising trainings for members of the supervisory board as part of the same cooperation.

32. State-owned companies are able to set an example for other companies in terms of how to conduct business responsibly and in a corruption-free manner; local government companies should also be increasingly guided by the principles of transparency. A survey of local government leaders conducted in the spring of 2020 revealed that corruption is perceived to exist in the activities of local government companies<sup>28</sup>. Thus, the local government audit committee could perform inspections in companies owned by local governments – the local government, following the example of the state, could also appoint members of supervisory boards based on their knowledge, instead of making the choice based on political affiliation. Already in 2017, it was found in the document 'Korruptsiooni ennetamine omavalitsustes – 11 sammu' ('Prevention of Corruption in Local Governments – 11 Steps')<sup>29</sup> by the Corruption Prevention Council of the Ministry of Justice that in the future, local governments should impose an obligation to search for candidates for the position of being a member of the supervisory board of their company or foundation by way of a public competition or in the same manner as the Appointments Committee as set out in the State Assets Act. Restrictions could also be set on the sponsorship activities of local government associations (section 88 of the State Assets Act) so that support could only be provided in certain limited cases. It must be considered that this is a matter of self-determination for the local government and therefore, local governments should be given recommendations to establish the appropriate procedures, which would

---

<sup>26</sup> The same principle should be adhered to while assembling the supervisory boards of foundations.

<sup>27</sup> [https://www.rahendusministeerium.ee/sites/default/files/Riigivara/Osalused/nk\\_liikme\\_kasiraamat.04092020.pdf](https://www.rahendusministeerium.ee/sites/default/files/Riigivara/Osalused/nk_liikme_kasiraamat.04092020.pdf)

<sup>28</sup> [https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumendid/omavalitsuste\\_kusitlus.pdf](https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumendid/omavalitsuste_kusitlus.pdf)

<sup>29</sup> See [https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumendid/kov\\_korruptsioonivastased\\_sammud.pdf](https://www.korruptsioon.ee/sites/www.korruptsioon.ee/files/elfinder/dokumendid/kov_korruptsioonivastased_sammud.pdf)

include regulating support paid by legal entities, finding candidates for the positions of members of the supervisory board of companies, the reporting obligation of the members of the supervisory board who are representatives of the local government, etc.

### Awareness

33. In addition to the need to raise the awareness of companies (see clause 28), attention must also be turned to other target groups, especially the youth. As the corruption survey<sup>30</sup> suggests, the youth are less likely to recognise corruption, they are more tolerant towards corruption, and younger business leaders are also more tolerant towards corruption. Thus, in cooperation with universities, it is necessary to continue educating both high school students (university students visiting schools) and university students themselves on the issues of awareness and prevention of corruption and financial crimes.
34. Although the survey shows that awareness of corruption among public sector employees is higher than awareness of corruption on average, there is still a need to continue raising awareness on conflicts of interest and ethical awareness among public sector officials, especially among local government employees and councillors, but also among senior officials.

### Protection of whistleblowers

35. Whistleblowing or reporting misconduct is not regulated in Estonia as a whole; only a few organisations have created opportunities for reporting. By the end of 2021, Estonia is obligated to transpose an EU directive on the same subject, setting high standards for domestic legislation. A two-tier notification system must be set up, e.g. all public authorities and companies with more than 50 employees as well as local government agencies need to set up hotlines for providing tips, incl. hotlines which ensure confidentiality. Within the framework of the action plan, a

corresponding draft is prepared, organisations are supported in the implementation of the measures through trainings, establishment of hotlines, etc.

### Sectoral transparency

#### Environment

36. Prevention of corruption has a direct link to transparency; this is largely reflected in the degree of openness of processes and decisions. The more public and accessible the relevant procedural rules, the decision-making stages, the draft documents, the arguments for and against the process, the final decisions, etc. are, the less likely it is that private interests will dominate, while the risk of being caught also increases.
37. According to the Ministry of the Environment, it is possible to increase transparency and improve existing processes in the issuance of environmental permits and licences, the sale and lease of state lands, and the handling of forest register data. With regard to the sale and lease of state land, criticism has been expressed regarding cases wherein everything happening is not clear, observable, or comprehensible to all parties and allegations of unjustified preference have been raised. Environmental permits are important in regulating the use of the environment, which is why increasing the transparency of granting and obtaining environmental permits from the point of view of prevention of corruption is very important. With regard to the forest register, the Ministry of the Environment has received hints of misuse of data with access restrictions; one of the reasons for this may be the way how forest companies use data with access restrictions.

#### Healthcare

38. Increasing transparency in the field of healthcare remains important: it is a limited service and demand for it exceeds the supply – this makes the field

---

<sup>30</sup> <https://www.korruptsioon.ee/et/korruptsioon-eestis-kolme-sihtruhma-uuring-2017-0>

of healthcare more susceptible to corruption, as evidenced also by the fact that Estonians have the most exposure to corruption in healthcare. Approximately 8–9% of people claim to have had a bribe-related experience when communicating with doctors<sup>31</sup>. The patients' exposure to corruption in healthcare facilities requires more in-depth research to distinguish expressions of gratitude from actually influencing a person, etc.

39. The pharmaceutical sector has a problem of having an inadequate system for limiting cost-plus pricing of medicines and fragmented monitoring of the system. The efficiency and effectiveness of the activities of the supervising agencies can be increased by developing the possibilities for sharing information between agencies. To increase the efficiency of control activities with limited resources, it is important to determine ways to implement so-called passive controls (e.g. increasing the role of patients in the follow-up inspections, incl. expanding the possibilities to check related information and report discrepancies).
40. WHO estimates that 10–25% of medical procurement costs are spent on corrupt payments, which is why it is necessary to clarify the occurrence and extent of this problem in the context of Estonia, understanding also the possible links between medical companies and hospitals to develop appropriate rules.
41. The audit of the National Audit Office<sup>32</sup> revealed that all medical bills pass automatic checks and standard inquiries, which enable the prevention and detection of simpler cases of misuse. However, neither solution involves comparing medical bills with medical records and therefore, neither solution is able to identify possible frauds and errors. Consequently, the Health Insurance Fund aims to develop and implement more effective control activities. As the contractual partners of the Health Insurance Fund are also checked by the State Agency of Medicines and the Health Board,

the exchange of information between institutions remains important for identifying risks and planning checks more effectively, which is currently not systematic.

## Welfare

42. The area of welfare has been included in the action plan as a new area. No systematic attention has been turned to increasing the transparency of the welfare sector, including the prevention of corruption and conflicts of interest. It is, however, an important area due to the welfare sector directly affecting the most vulnerable members of the society. During the implementation period of the action plan, the objective is to gain an overview of the problem areas in the field of welfare and to contribute primarily to raising awareness in and the transparency of the sector. Guidance material on the prevention of sectoral conflicts of interest and corruption will be developed, its implementation will be supported through communication activities, etc.

## Sport

43. In the field of culture, a study was conducted to map situations with a danger of corruption<sup>33</sup>, but sport was left out of its scope – this action plan addresses this shortcoming. The basic principles of Estonian sports policy until the year 2030 have been established by the Riigikogu in 2015, determining sport and movement as an important economic sector as one of the priority development directions in Estonia. Annual public expenditure on sport is estimated to be about 100 million euros, including about 40 million provided by the central government and about 60 million from local governments. Allowances of sponsors and training fees paid by parents are added to these amounts. Therefore, sport has an important role, both in view of the budget and for the society, which makes it necessary to stand up for sport that would be fair, transparent, and based

---

<sup>31</sup> Ibid.

<sup>32</sup> 'Control activities of the Estonian Health Insurance Fund over the financing of healthcare services':

<https://www.riigikontroll.ee/tabid/206/Audit/2504/Area/21/language/et-EE/Default.aspx>  
<sup>33</sup> <https://www.korruptsioon.ee/et/kultuurivaldkonna-korruptsiooniriskide-ja-pettuste-analuus-ning-nende-maandamiseks-lahenduste-valja>

on ethical values. According to international studies, the use of prohibited substances (doping), bribery, match fixing, misuse of insider knowledge, and money laundering are mainly considered acts of sports corruption. Doping, match fixing, and violations related to sports administration have been identified as the most common forms of corruption in Estonian sports – manipulation of the election results of the governing bodies of sports organisations, bribery to obtain the best times for training, etc.

### Investigation of corruption offences

44. While the investigation of public sector corruption has already reached a relatively high level in Estonia, business corruption has thus far received rather modest attention. In Estonia, a total of 10 cases of business corruption have been registered in the last few years – companies do not tend to report cases of corruption, while cases of business corruption do cause harm to a fair business environment. The police and the prosecutor's office should address the capacity to investigate business corruption, i.e. to develop an analytics-based and sector-based approach to business corruption without decreasing the level of investigation of public sector corruption cases. As the capacity of police to gather information and analyse it grows, the needs of the prosecutor's office need to be considered just as much, so that the development of one part of the system would not lead to other parts of the system developing failures. Prosecutor's offices lack the necessary analytical and expert capacity to investigate corruption and financial crimes (e.g. in the areas of financial, tax, and administrative law (procurements)).

### Impact assessment of anti-corruption policy

45. Although it is difficult to identify direct links between changes in people's perceptions and behaviour and anti-corruption policy, impact assessments are a natural part of any sectoral policy. As part of the framework of the action plan, a corruption study must be conducted (in three target groups);

among other aspects, this can be supplemented with questions concerning the welfare sector and others. The implementation of regulation for the protection of whistleblowers must also be analysed. Sectoral analyses of corruption have recently been conducted in the environmental, educational, and cultural fields, but a separate (new) study is needed in the healthcare sector and other areas (e.g. IT) – head of each sector/ministry should be responsible for the analysis of corruption risks and consider this analysis in their work.

## Action plan

| Area  |    | Activities  | Responsible actors  | Involved parties  | Budget |
|---|----|---|---------------------|-------------------|--------|
| <b>1. Transparency of state activities</b>  |    |   |                     |                   |        |
| <b>1.1. The transparency of the legislative process, including lobbying rules and guidelines for senior officials to avoid conflicts of interest.</b> | 1. | Guidelines for ministers and their advisers to avoid conflicts of interest will be established and implemented.   | Ministry of Justice |                   | 0      |
|   | 2. | Good practice (ethics norms) for communication with lobbyists will be established and implemented for officials.  | Ministry of Justice |                   | 0      |
|   | 3. | Relevant officials will be trained in accordance with the new requirement. An e-training module on communication with lobbyists will be set up.   | Ministry of Justice |                   | 3,000  |
|   | 4. | The state co-creation environment being created will provide an opportunity to disclose information concerning meetings with stakeholders (e.g. content of the meeting, contact) held during the development of the draft act. (Finances of the SF in stage II or III of development)   | Ministry of Justice | Government Office | 0      |
|   | 5. | An anti-corruption/transparency assessment will be included in the draft impact assessment checklist and its implementation will be monitored.  | Ministry of Justice |                   | 0      |
| <b>1.2. Anti-corruption Act</b>   | 1. | An analysis of the Anti-corruption Act will be conducted (doctor as an official; procedural restrictions; related party, if the duties of the official arise from official duties; processing of data intended for the fulfilment of the obligation provided for in clause 3 (3) 2) of the Anti-corruption Act), the Act will be amended as necessary, guidance materials will be published, etc. | Ministry of Justice |                   | 0      |
|   | 2. | Development of guidelines for better understanding and more uniform implementation of the law, if necessary.  | Ministry of Justice |                   | 0      |
| <b>1.3. Public procurements and grants</b>  | 1. | The Public Procurement Register is developed in a way to allow noting the absence of independence/conflict of interest.   | Ministry of Finance |                   | 6,700  |

|  |  |   |                             |        |
|--|--|---|-----------------------------|--------|
|  | <p><b>2.</b> The Public Procurement Act will be analysed and, if necessary, an amendment will be made, establishing the obligation to register the personal identification codes of people making decisions in evaluation committees etc. of procurements in the Public Procurement Register and to publish this data, use it as metadata. If necessary, corresponding developments will also be made in the Public Procurement Register.</p>  | Ministry of Finance                         | Ministry of Justice         | 0      |
|  | <p><b>3.</b> The awareness of contracting authorities will be increased to encourage making small purchases also with the use of the Public Procurement Register (e.g. a proposal to change procurement procedures).</p>   | Ministry of Finance                         | State Shared Service Centre | 0      |
|  | <p><b>4.</b> An independent legal analysis will be commissioned on whether and how it would be possible to assess adherence to principles of ethical and transparent business conduct of different tenderers during public procurements.</p>   | Ministry of Finance                         | Ministry of Justice         | 10,000 |
| <p><b>1.4. Data and its availability</b></p> | <p><b>1.</b> Opener (www.opener.ee) will be supplemented to make it possible to show the connections existing between contracting authorities, decision-makers in public procurement proceedings (requires amendments to be made to the Public Procurement Act and developments of the Public Procurement Register), and winners of public procurement proceedings; and, inter alia, to use the payment records included in the balance records information system; functionality will also be created to screen for high-risk procurements.</p> | Transparency International Estonia          | Ministry of Justice         | 35,000 |
|  | <p><b>2.</b> In the field of awarding support, a central body (State Shared Service Centre) is appointed, which has a comprehensive overview of the field and the task of coordinating the cooperation between the institutions providing support in different areas as well as the smooth exchange and use of data between them.</p>  | State Shared Service Centre                 | Ministry of Finance         | 0      |
|  | <p><b>3.</b> Developments regarding the Commercial Register and other registers will be made, incl.:<br/> a) register of beneficial owners being created and linked to the Commercial Register;<br/> b) various company data being linked in the Commercial Register and being linked/made available as a service to PRISIS/awards of grants.</p>  | Centre of Registers and Information Systems | Ministry of Finance         | 0      |

|   |    |  |   |                                  |         |
|---|----|--|---|----------------------------------|---------|
| <b>1.5. Risk assessment and mitigation</b>            | 1. | Regular corruption risk assessments are performed, involving senior officials (GRECO's recommendation).  | Ministries                                      |                                  | 0       |
|   | 2. | The risk management methodology will be amended, supplemented with guidelines for assessing and mitigating corruption risks, and distributed in the public sector.   | Ministry of Finance                             | Ministry of Justice              | 0       |
|   | 3. | The procedure for the election and appointment of directors general of government agencies must ensure that the principles of competition and transparency are considered for all candidates.  | Ministries                                      |                                  | 0       |
| <b>2. Transparency of local government activities</b> |    |  |   |                                  |         |
| <b>2.1. Strength of the internal control system</b>   | 1. | Trainings: a) local government employees are trained to develop internal control systems; b) council members will be trained after the 2021 elections on the nature of internal control systems and the role of councils in it.  | Ministry of Finance                             | Ministry of Justice              | 22,000  |
|   | 2. | Practical workshops on open government shall be conducted for local government employees; for example, trainings will be conducted on the topics of organising electronic council meetings, transparency, disclosure of decisions, and involvement of communities.   | Ministry of Finance                             |                                  | 35,000  |
|   | 3. | The Local Government Organisation Act will be analysed, and if necessary, it will be amended to improve the organisation of the internal control system and the performance of the internal audit, and the work of the audit committee during the general revision of the Local Government Organisation Act. | Ministry of Finance                             | Ministry of Justice              | 0       |
|   | 4. | The guidelines for internal control systems will be updated and made more practical.   | Ministry of Finance                             | Ministry of Justice              | 0       |
| <b>2.2. Plans and building permits</b>                | 1. | Clear construction and use conditions for areas of land will be established with plans.  | Local governments                               | Ministry of Finance              | 45,000  |
|   | 2. | Developments of the Register of Construction Works will ensure the availability of links between plans and building permits, as well as the availability of clear information and justifications.  | Ministry of Economic Affairs and Communications | Ministry of Finance              | 0       |
|   | 3. | A common database of plans will be developed in order to promote the availability of plans and the transparency of decisions to be made.   | Ministry of Finance                             | Ministry of Economic Affairs and | 400,000 |

|    |   |                     |  |         |
|----|---|---------------------|--|---------|
|    |   |                     | Communications Land Board  |         |
| 4. | A procedural environment for plans will be created which will function on uniform bases, provided that it simplifies the preparation and processing of plans and increases the effectiveness of plans, as well as the transparency of the field. The final decision on whether this environment will be developed will be made in 2021. | Ministry of Finance | Ministry of Economic Affairs and Communications                                | 500,000 |
| 5. | A legal framework will be established for agreements on social infrastructure and technical infrastructure outside of the planning area.  | Ministry of Finance |  | 0       |
| 6. | Legal bases will be created for agreements to be concluded between the developer and the local government or community (e.g. village societies) to compensate for disturbances/changes resulting from changes in the living environment.  | Ministry of Finance | Ministry of Economic Affairs and Communications<br>Ministry of the Environment | 0       |
| 7. | The need to strengthen the supervision of spatial planning and construction decisions of local governments will be analysed.  | Ministry of Finance | The Association of Estonian Cities and Municipalities                          | 0       |

### 3. A fair business environment

#### 3.1. Prevention of business corruption

|    |   |                       |  |       |
|----|---|-----------------------|--|-------|
| 1. | The awareness of companies regarding the prevention of competition infringements will be increased: prohibited agreements, incl. price agreements, market sharing, exchange of information. Educational videos on the prevention of competition infringements will be produced for use by companies.  | Competition Authority |  | 5,000 |
| 2. | Awareness of companies regarding the prevention of business competition will be increased: explanatory work shall be done among auditors and companies on the forms and effects of business corruption in cooperation with professional associations, e.g. online learning tools for use within the company will be created; explanatory work will also be conducted on transaction fees and conflicts of interest. | Ministry of Justice   |  | 5000  |

|  |                     |  |                     |   |        |
|--|---------------------|--|---------------------|---|--------|
|  | 3.                  | The risk management methodology will be propagated in the private sector with an objective for it <u>to be adopted more widely; its further implementation options will also be analysed (especially in large companies).</u>  | Ministry of Justice | Chamber of Commerce and Industry<br>Transparency International<br>Estonia | 0      |
|  | 4.                  | Monitoring of compliance with the obligation to submit annual reports will be better ensured than before: reminders for the timely submission of the annual reports and other preventive measures, as well as sanctioning measures. Possibilities for simplification of reporting and measures to ensure the submission of reports will be proposed.   | Ministry of Justice | Centre of Registers and Information Systems                               | 0      |
| <b>3.2. State and local government companies and foundations</b> | 1.                  | Amendments to the State Assets Act, which will see state-owned companies and larger foundations prepare and publish a report on responsible and sustainable business activities: section 88 of the State Assets Act will also specify the minimum contents of the report in addition to the reporting obligation.  | Ministry of Finance |   | 0      |
|  | 2.                  | The expectations of the owners of incorporated entities are periodically checked so that the state would be a better owner acting consciously and purposefully. Periodic renewal of ownership expectations and control of fulfilment of the expectations will be established in each ministry.   | Ministry of Finance | All holdings are governed by ministries                                   | 0      |
|  | 3.                  | During the trainings on the local government internal control system (clause 2.1.1) and on updating the guide of the internal control system (clause 2.1.4), the possibilities of using an appointments committee for electing members of the supervisory boards of local government companies and electing members of those supervisory boards by public competition will also be addressed during the trainings. | Ministry of Finance | The Association of Estonian Cities and Municipalities                     | 0      |
|  | <b>4. Awareness</b> |  |                     |   |        |
|  | 1.                  | Central public sector and public service ethics trainings will be held for public sector employees and state/local government employees.   | Ministry of Finance |   | 59,885 |
|  | 2.                  | Classes on the topic of corruption will be held for high school students in cooperation with universities (university students).   | Ministry of Justice |   | 10,000 |

|  |    |  |                             |  |         |
|--|----|--|-----------------------------|--|---------|
|  | 3. | Changes in the curricula of business specialties will be supported (to cover issues related to business ethics, corruption, and financial crime). In-service training of lecturers (taxation, financial accounting, etc.) and other such activities.   | Ministry of Justice         |  | 20,000  |
| <b>5. Protection of whistleblowers</b> |    |  |                             |  |         |
|  | 1. | A draft act on the protection of whistleblowers will be submitted to the Government of the Republic.   | Ministry of Justice         |  | 0       |
|  | 2. | The Whistleblower Protection Act and the rules arising from it will be implemented, incl. training, guidance material to assist institutions and responsible persons.  | Ministry of Justice         |  | 5,000   |
|  | 3. | An electronic notification channel will be created (depending on the ISF).   | Ministry of Justice         |  | 100,000 |
|  | 4. | The online learning on corruption will have a module on the topic of the protection of whistleblowers added to it.   | Ministry of Justice         |  | 1,000   |
| <b>6. Sectoral transparency</b>        |    |  |                             |  |         |
| <b>6.1. Environment</b>                |    |  |                             |  |         |
|  | 1. | Sale and lease of state lands: It will be assessed to what extent the information on sales and leases of state land, the relevant procedural rules, the various stages of decision-making, draft documents, arguments for and against decisions, final decisions, etc. are public and accessible. Transparency will be increased based on the results and amendments will be made to legislation, if necessary.  | Ministry of the Environment |  | 8,000   |
|  | 2. | Issuance of environmental permits (see similar activities as above, but in another area).  | Ministry of the Environment |  | 9,000   |
|  | 3. | Access to the data of the Forest Register: The operation and quality of measures implemented for the protection of data of the Forest Register will be assessed and improved. (a) It will be determined whether access by forest companies to data with restricted access is proportionate to the real needs of the companies and the necessary changes will be made. (b) A control system will be developed and implemented to grant rights to users of the Forest Register and to control the use of the acquired rights. If necessary, changes in practice and legislation. | Ministry of the Environment |  | 7,000   |

|                        |           |  |                                |   |         |
|------------------------|-----------|--|--------------------------------|---|---------|
| <b>6.2. Healthcare</b> | <b>1.</b> | The pricing of medicines will be made more transparent. For this, the following activities will be performed: a) an analysis of the regulatory environment, leading to proposals for increasing the transparency of pricing pharmaceuticals and regulating the supervision system; b) amendments to legislation. | Ministry of Social Affairs     |   | 0       |
|                        | <b>2.</b> | A joint dashboard of three institutions will be created, combining the inspections of healthcare providers conducted by the Estonian Health Insurance Fund, the Health Board, and the State Agency of Medicines and the results thereof.   | Estonian Health Insurance Fund | Health and Welfare Information Systems Centre | 120,000 |
|                        | <b>3.</b> | The Health Insurance Fund will increase inspection activities through the development of machine learning. (The budgetary need is ongoing, i.e. not a one-time cost.)  | Estonian Health Insurance Fund | Health Insurance Fund                         | 40,000  |
|                        | <b>4.</b> | A functionality will be created in the patient portal allowing people to dispute their medical bill.   | Estonian Health Insurance Fund | Health and Welfare Information Systems Centre | 30000   |
|                        | <b>5.</b> | The health information system and digital registry, incl. functionalities increasing transparency, will be developed.  | Ministry of Social Affairs     | Health and Welfare Information Systems Centre | 0       |
|                        | <b>6.</b> | An analysis of possible connections between companies in the medical industry and hospitals will be conducted.   | Ministry of Social Affairs     | Hospitals                                     | 0       |
| <b>6.3. Welfare</b>    | <b>1.</b> | A guide for the prevention of conflicts of interest and corruption will be developed for care institutions and the awareness of people working in the field will be raised.  | Ministry of Social Affairs     |   | 0       |
| <b>6.4. Sport</b>      | <b>1.</b> | The Estonian Center for Integrity in Sports will be developed into a competence centre against sports corruption.  | Ministry of Culture            | The Estonian Center for Integrity in Sports   | 0       |
|                        | <b>2.</b> | The activities of interest groups against sports corruption (incl. the national contact point against manipulation of sports competitions stipulated in section 11 <sup>1</sup> of the Sport Act) will be supported.   | Ministry of Culture            |   | 0       |
|                        | <b>3.</b> | Awareness of children and the youth training in sports clubs and schools, athletes, coaches, members of the governing bodies of sports officials and sports organisations, and members of amateur and professional sports events will be raised.   | Ministry of Culture            |   | 0       |

| <b>7. Investigation of corruption offences</b>        |    |  |                               |                                    |           |
|---|----|--|-------------------------------|------------------------------------|-----------|
|   | 1. | The capacity of the police to investigate business corruption will be increased. <sup>34</sup>   | Police and Border Guard Board | Ministry of the Interior           | 150,000   |
|   | 2. | The Prosecutor's Office will create procedural and analytical capacity in the area of business corruption and financial crime (recruitment of auditors, support staff, etc.). (The budgetary need is ongoing, i.e. not a one-time cost.) | Prosecutor's Office           |                                    | 1,123,851 |
| <b>8. Impact assessment of anti-corruption policy</b> |    |  |                               |                                    |           |
|   | 1. | A corruption survey of three target groups will be conducted, incl. supplementing the survey with questions concerning the social sector, to assess the perception of corruption.  | Ministry of Justice           | Ministry of Social Affairs         | 50,000    |
|   | 2. | The implementation of the legislation protecting whistleblowers will be analysed.  | Ministry of Justice           | Transparency International Estonia | 50,000    |
|   | 3. | At least two sectoral corruption surveys will be conducted: the area will be selected during the implementation period of the action plan.   |                               | Ministry of Justice                | 80,000    |
|   | 4. | The anti-corruption network (strategic partnership) will be strengthened and expanded.   | Ministry of Justice           |                                    | 20,000    |

<sup>34</sup> Implemented upon receipt of additional funds.