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RE	Restricted to a group specified by the consortium (including the Commission Services)	<input type="checkbox"/>
Co	Confidential, only for members of the consortium (including the Commission Services)	<input type="checkbox"/>

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Introduction

Deliverable 4.3 European transparency legislation observatory or European Public Accountability Mechanisms (EuroPAM) is a website (<http://europam.eu/>) that presents the results of D1.2 “Database of legal and regulatory norms” that was submitted by the Hertie School of Governance in the end of February 2016. EuroPAM is a database of legal and regulatory norms for 34 European countries.¹ EuroPAM is an extension of the Public Accountability Mechanisms Initiative (PAM) of the World Bank, which is a primary data collection effort that produces assessments of in-law efforts to enhance the transparency of public administration and the accountability of public officials. The EuroPAM database serves as a European transparency legislation observatory that is based on the PAM indicators for financial disclosure, conflict of interest restrictions, and freedom of information, while also adding data on public procurement, and updating the International Institute for Democracy and Electoral Assistance (IDEA) database on political financing.

EuroPAM in-law data measures the comprehensiveness of a country’s legal framework in four spheres of administrative transparency and accountability: financial disclosure, conflict of interest, political finance, and freedom of information. Indicators for these mechanisms are based on internationally-accepted legal standards, established by organizations such as the World Bank, Article 19, Access Info Europe, Global Integrity, and the Institute for Democracy and Electoral Assistance. For public procurement, EuroPAM in-law data assesses both the extent of the procurement framework and its adherence to norms established by the European Commission.

To ensure the reliability of in-law data, a rigorous and systematic approach was applied to data collection and analysis. Researchers produced summaries of the legal provisions collected from primary source documents, in the original language where possible. In cases where further consultation was required to clarify legal codes, the data was sent to technical in-country experts for feedback on accuracy and relevance. The final data is released in both quantitative and qualitative form for policy and research purposes. Several rounds of data collection are envisioned from 2012 onwards. The exception to this is public procurement, for which data collection began in 2015.

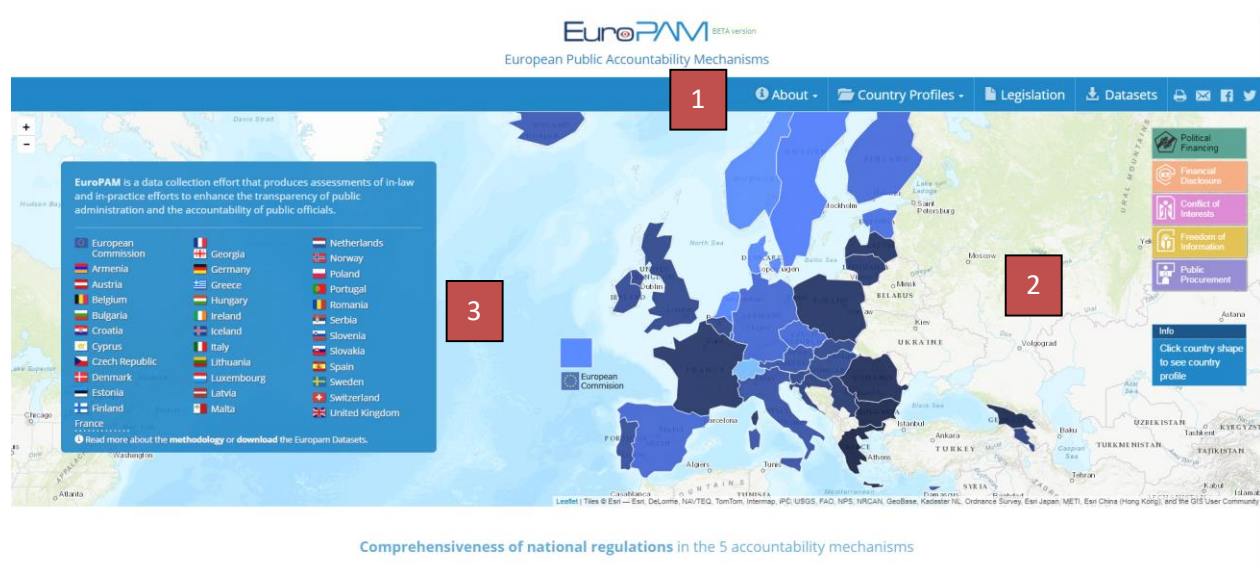
¹ Armenia, Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom. The European Parliament and/or European Commission are also included for each mechanism.

1. EuroPAM.eu website

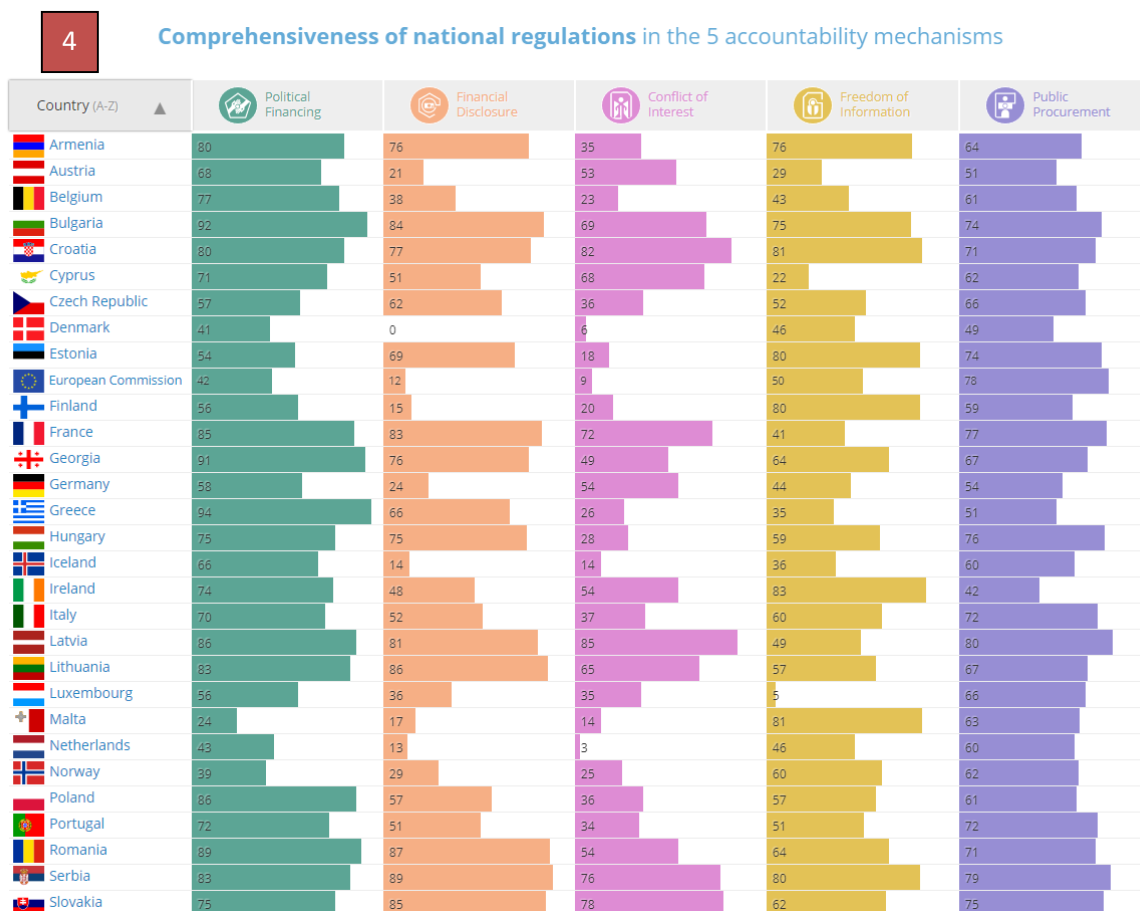
The Europam.eu website provides two main ways of exploring data. The first (**Part 1**) is the overview table, which allows users to rank countries according to each of the five accountability mechanisms. The second way to explore data is on the country-specific level by way of the country profiles (**Part 2**). Each of these sections will be expanded upon in more detail in the screenshots below.

The overview table with rankings and country profiles are based off of 2017 data. Additionally, data for the years 2012, 2015, 2016 and 2017 is available to download for each mechanism save public procurement, which currently only has data available from 2015. The Legislation section of the website allows users to explore the key pieces of legislation relevant for each mechanism in each country; these laws are provided as downloadable PDFs, although in some cases a digital version of the law is not available.

EuroPAM Landing Page (part 1)



EuroPAM Landing Page (part 2)



2. Header Section: EuroPAM Logo and Navigation Bar

The header of the opening page (**Segment 1**) contains the EuroPAM logo, as well as links to the About page, Country Profiles, Legislation copies available for download, datasets for download, and sharing icons.

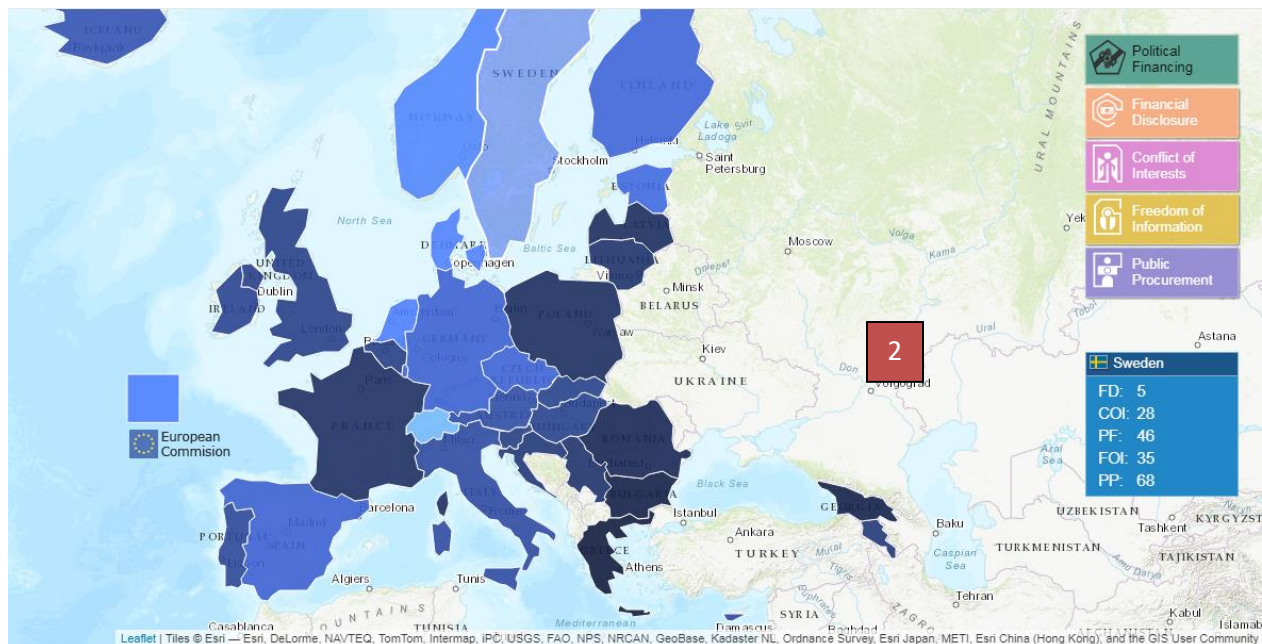


3. The Map and Country Box

The top half of the page features an interactive map (**Segment 2**) as well as links to the country profiles for each country featured in EuroPAM (**Segment 3**).

The map offers a quick visual overview of how different countries score according to each of the five mechanisms. Darker shading equate to more comprehensive legislation. Each of the five colourful buttons for the mechanisms can be clicked, changing the shading of

the map based on how the scores change across mechanisms. Additionally, hovering over a country results in that country's scores for all five mechanisms showing in the box on the right hand side.



In this box, each country is a link to an individual country profile. Additionally, hovering over a country in this list causes their mechanism scores to appear in the above-mentioned box on the right-hand side.




















4. The Lower Half of the Landing Page: Score Overview

The lower half of the landing page (**Segment 4**) features a table that displays the 35 target countries and their scores for each of the five accountability mechanisms. By default, the table is sorted alphabetically by country name, but users can also click on individual columns to sort by scores (see example screenshot below, sorted by conflict of interest score).

Comprehensiveness of national regulations in the 5 accountability mechanisms

4

Country (A-Z)	 Political Financing	 Financial Disclosure	 Conflict of Interest ▼	 Freedom of Information	 Public Procurement
 Latvia	86	81	85	49	80
 Slovenia	77	87	82	80	66
 Croatia	80	77	82	81	71
 Slovakia	75	85	78	62	75
 Serbia	83	89	76	80	79
 France	85	83	72	41	77
 Bulgaria	92	84	69	75	74
 Cyprus	71	51	68	22	62
 Lithuania	83	86	65	57	67
 Germany	58	24	54	44	54
 Romania	89	87	54	64	71
 Ireland	74	48	54	83	42

5. About Section

The “About” section on the navigation bar links to three different pages:

a. About EuroPAM

This page broadly describes the project’s goals and approach. It highlights each of the five mechanisms upon which the site focuses, explaining their relevance to the concept of accountability and describing the main areas of coverage or in-law manifestations of such mechanisms.



EuroPAM BETA version

European Public Accountability Mechanisms

[About](#) [Country Profiles](#) [Legislation](#) [Datasets](#)

About EuroPAM

The EuroPAM database is part of an EU-funded digital whistleblowing project (DIGIWHIST) that aims to improve trust in governments and efficiency of public spending across Europe. This is done by empowering civil society, investigative journalists, and civil servants with the information and tools they need to increase transparency in public spending and accountability of public officials in all EU and neighbouring countries.

In terms of content, EuroPAM is an extension of the Public Accountability Mechanisms Initiative (PAM) of the World Bank, which is a primary data collection exercise that produces assessments of in-law and in-practice efforts to enhance the transparency of public administration and the accountability of public officials. The EuroPAM database is based on PAM indicators for financial disclosure, conflict of interest restrictions, and freedom of information, while also adding a newly designed database on public procurement, and updating the International Institute for Democracy and Electoral Assistance (IDEA) database on political financing.

The EuroPAM database includes the following countries: Armenia, Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom. The European Parliament and/or European Commission are also included for each mechanism.

For explanations of data collection and analysis, as well as indicator lists for each mechanism, please consult the [Methodology](#) page.

Mechanisms included in EuroPAM database

Political financing

Political financing is about the role that money plays in the political sphere. Money is necessary for inclusive democracy and effective governance, allowing candidates and parties to reach out to voters and for the building of long term political platforms organizations. However, it can also lead to politicians listening to their donors rather than their voters and to government contracts awarded not to the company with the best bid but to the one that provided most money during the last election campaign. Countries around the world have introduced various provisions limiting who and how much can be contributed to political parties and electoral candidates: how



b. Methodology

This page explains how data was collected and scored. It also provides downloadable PDFs that list all of the indicators used to generate scores for each of the five mechanisms.


European Public Accountability Mechanisms

AboutCountry ProfilesLegislationDatasets

The EuroPAM Methodology

In-law data. EuroPAM in-law data measures the comprehensiveness of a country's legal framework in four spheres of administrative transparency and accountability: financial disclosure, conflict of interest, political finance, and freedom of information. Indicators for these mechanisms are based on internationally-accepted legal standards, established by organizations such as the World Bank, Article 19, Access Info Europe, Global Integrity, and the Institute for Democracy and Electoral Assistance. For public procurement, EuroPAM in-law data assesses both the extent of the procurement framework and its adherence to norms established by the European Commission.

- 2015 data: laws current as of December 31, 2014
- 2012 data: laws current as of December 31, 2011

To ensure the reliability of in-law data, a rigorous and systematic approach is applied to data collection and analysis. Researchers produce summaries of the legal provisions collected from primary source documents (e.g. national legislation) reviewing in the original language where possible. In cases where further consultation is required to clarify legal codes, the data is sent to technical in-country experts for feedback on accuracy and relevance. Country experts have either in-depth legal knowledge of the mechanism being examined in a specific country or expertise in a related field. The final data is released in both quantitative and qualitative form for policy and research purposes. Data collection is done or envisioned for years 2012, 2015, 2016, and 2017. The exception to this is public procurement, for which data collection began in 2015 only.

Scoring for political financing, financial disclosure, conflict of interest, and freedom of information


Data is quantified on a simple 0-1 scale, with most indicators falling into a binary of 0 or 1 that reflects whether a provision exists within the law. Scores for each country are then aggregated into categories for each mechanism, and an overall country score is produced on a 0-100 scale for each mechanism.

Scoring for public procurement

Scores for each country are aggregated into categories, and an overall country score is produced on a 0-100 scale. A more detailed scoring framework is employed that captures normative dimensions and is [available here](#).

c. Contact

This page explains that EuroPAM is produced and maintained by the European Research Centre for Anti-Corruption and State-Building (ERCAS) and was funded and conceived as part of the DIGIWHIST project.


European Public Accountability Mechanisms

AboutCountry ProfilesLegislationDatasets

Contact

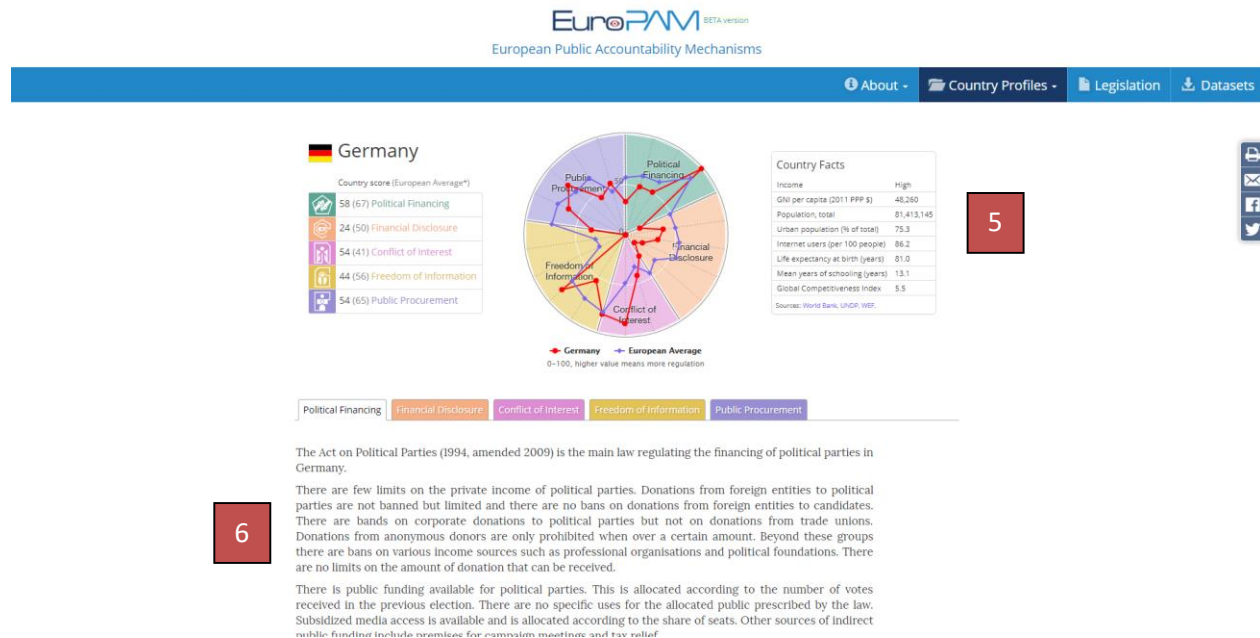
EuroPAM is a data collection effort that produces assessments of in-law and in-practice efforts to enhance the transparency of public administration and the accountability of public officials in all EU and neighbouring countries. It is compiled and published by a team of researchers at the European Research Centre for Anti-Corruption and State-Building (ERCAS) at the Hertie School of Governance in Berlin. It is funded and conceived as part of the EU Horizon 2020 DIGIWHIST project, a collaborative research project with the aim of empowering society to combat public sector corruption. The main editor of the EuroPAM is ERCAS researcher Aram Khaghaghordyan.

We are frequently reviewing and refining our methodology and are happy to receive any feedback that you might have. We also are happy to help you work with the EuroPAM and are open to collaborations for further analysis. Please do not hesitate to contact us with any requests or questions:

European Research Centre for
Anti-Corruption and State-Building
Hertie School of Governance
Friedrichstraße 180
10117 Berlin
Germany
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6. Country Profiles

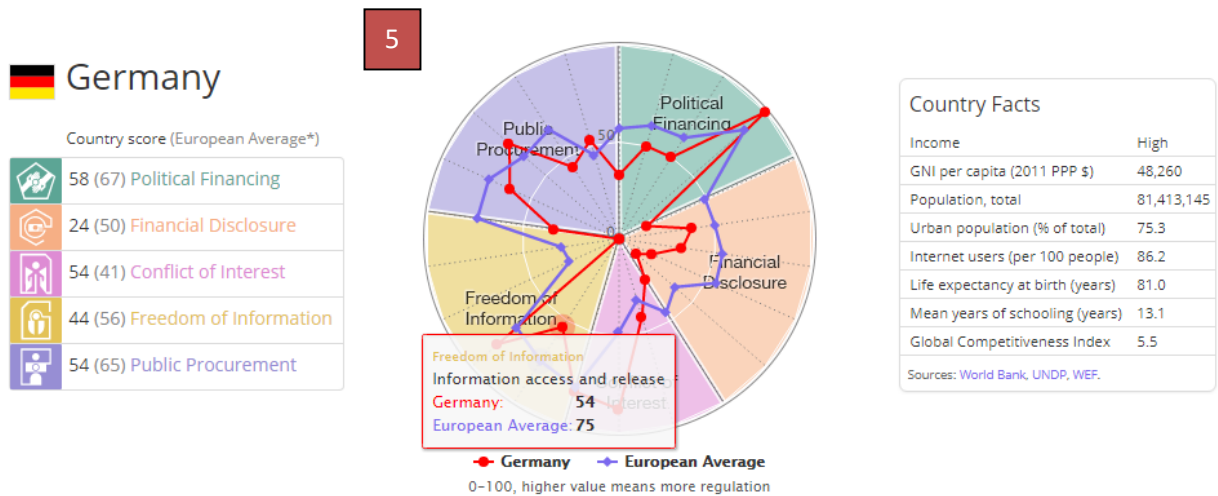
Each country featured by EuroPAM has its own Country Profile page. There are two main parts to this page. The first part is the visualization of the country's score relative to the European average alongside general descriptive facts about the country (**Segment 5**). The second part features in-depth information on a country's score for each of the five mechanisms (**Segment 6**). This includes three different informational tabs for each mechanism, which will be explained in greater detail later in this section.



a. Visualization of country scores

The first half of the country profiles (**Segment 5**) features three main components that help give users additional context for understanding a country's scores. To the left, a box shows numerically what the country has scored for all five mechanisms with a comparison to the European average provided in parentheses. In the middle, an interactive graphic visualizes the difference between the country's scores and the European average with two different colored lines (red representing the country in question and purple representing the European average). This graphic also goes into more detail, using multiple points in each mechanism's colored area to show the scores for the different metrics that make up the overall score for the mechanism (e.g., showing the individual scores for restrictions, sanctions, and monitoring and oversight that together make up the overall score for the Conflict of Interest mechanism). Hovering over any of the points displays an informational box showing the country's score on that specific metric and the European average (as shown in the graphic below). To the right, the Country Facts

box gives users further context with which to evaluate the scores, such as a country's income level or life expectancy.



b. In-depth score information

The second half of the country profile page features a separate tab for each of the five mechanisms (**Segment 6**). For each mechanism, there is a brief discussion of the legal norms in place (e.g. what the relevant laws are, description of legal procedures, etc.). Below that, there are three tabs that give users an opportunity to explore the data more thoroughly:

i. Quantitative Data

This tab shows the scores for a given country on each of the metrics that make up the total score for a mechanism. It shows values for all years for which EuroPAM has data, although only the most recent values are used to calculate overall mechanism scores.

ii. Qualitative Data

This tab shows you how each metric was scored based on how the country expert answered questions about features of the legal framework in place – for example, whether or not Freedom of Information laws in the country cover the executive, judicial, and legislative branches or whether the law specifies what administrative sanctions should be levied should disclosure requirements be violated.

iii. Laws

This tab offers downloadable, PDF versions of the relevant laws for that particular mechanism and country.

The federal legal freedom of information framework in Germany is established by the Freedom of Information Act (2005, amended 2013). The law applies to federal bodies and institutions insofar as they discharge administrative tasks under public law and therefore only applies to administrative documents.

Specific exemptions to disclosure are outlined in the aforementioned FOI law, Criminal Code, and the Federal Data Protection Act (2003, amended 2009). No public interest test exists whereby exemptions to disclosure may be overridden in cases where disclosure of information benefits the public interest.

Appeals are accepted in the first instance at public bodies covered under the FOI law, and may also be filed with the courts as a last resort. Appeals can also be made to the Federal Commissioner for Freedom of Information; this role is performed by the Federal Commissioner for Data Protection and is subject to the processes set out in the Federal Data Protection Act.

There are no sanctions specified in the law for violations of FOI provisions. Other than the role played by the Federal Commissioner for Data Protection in receiving appeals, there is no other external agency designated to oversee implementation.

Quantitative Data

Qualitative Data


Laws

Primary Metric	2012	2015	2016
Scope and Coverage	71	82	82
Information access and release	54	54	54
Exceptions and Overrides	83	83	83
Sanctions for non-compliance	0	0	0
Monitoring and Oversight	0	0	0

Values lie in range between 0 and 100, higher values implying higher legislation comprehensiveness

7. Legislation

This page lists out the different pieces of legislation that are relevant for each mechanism and provides them for download as PDFs. The laws listed here are the same as those listed on individual country profiles under the “Laws” tab.


BETA version


European Public Accountability Mechanisms

About
Country Profiles
Legislation
Datasets

European Commission

- Armenia
- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Georgia
- Germany
- Greece
- Hungary
- Ireland
- Iceland
- Italy
- Lithuania
- Luxembourg
- Latvia
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Serbia
- Slovenia
- Slovakia
- Spain
- Sweden
- Switzerland
- United Kingdom

Legislation / European Commission



Political Financing


Regulation (EU, Euratom) No 1141/2014 of the European Parliament and of the Council of 22 October 2014 on the statute and funding of European political parties and European political foundations (English) [pdf](#)

Regulation (EC) No 2004/2003 of the European Parliament and of the Council of 4 November 2003 on the regulations governing political parties at European level and the rules regarding their funding, amended 2007 (English) [pdf](#)

European Commission

- Armenia
- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Georgia
- Germany
- Greece
- Hungary
- Ireland
- Iceland
- Italy
- Lithuania
- Luxembourg
- Latvia
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Serbia
- Slovenia
- Slovakia
- Spain
- Sweden
- Switzerland
- United Kingdom

Legislation / European Commission



Financial Disclosure

Code of Conduct for Members of the European Parliament, 2012 (English) [pdf](#)


Implementing Measures for the Code of Conduct for Members Of The European Parliament With Respect To Financial Interests And Conflicts Of Interest, 2013 (English) [pdf](#)

Rules of Procedure for Members of European Parliament, 2015 (English) [pdf](#)

European Commission

- Armenia
- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Georgia
- Germany
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- Hungary
- Ireland
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- Italy
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- United Kingdom

Legislation / European Commission



Conflict of Interest

Code of Conduct for Members of the European Parliament, 2012 [missing file](#)

Rules of Procedure for Members of European Parliament, 2013 [missing file](#)