

Governance for Transparency Survey 2022

Final Presentation

May 11th, 2022



Governance for Transparency – Survey 2022

About the Project

Transparency International promotes good governance and fights corruption. The present research aims to contribute towards this objective by delivering an overview of the current state of party-level governance. To be precise, this research examines and analyses the measures in place to prevent wrong-doing along four topic areas. Furthermore, it gives actionable recommendations on a general- and part-level. At the same time, the research represents a new edition of the 2019 survey about transparency.

Problem Statement

Transparency and integrity are key pillars for building a trusted and well-working political system. In particular, corruption and other misuses of power have to be proactively prevented by installing robust internal governance processes. Nevertheless, European countries have grown accustomed to the occasional political scandal (e.g., Ibiza-gate or Partygate). The path toward robust governance can be challenging for a political party and is often unprioritized. Especially because the status quo on practices as well as areas for improvement remain unclear. This problem has to be addressed, to maintain and improve the public trust-level in the Belgian political system.

The Systematic Solution

This research conducts a comparative analysis by creating an extensive benchmark framework. Along four topic areas (i.e., Formal Policies & Standards, Organization & People, Financial Disclosure & Lobbying, and Internal & Public Scrutiny), the research assesses current party-level ambitions geared towards fighting corruption. By conducting interviews with party representatives, the status-quo is assessed and evaluated. Consequently, the results are compiled and analyzed. The final product of the research are actionable recommendations, both on a party- and general level.

Results

The final results of this research are presented in party-specific reports and a general report. Party-specific reports contain actionable party-level recommendations, a peer comparison, an in-depth analysis of all four topic areas, and an assessment of the party development since the last survey in 2019. The general report contains aggregated results and delivers the collected data in an easy-to-understand way. The overall average score lies at 2.8 (scale of 1-5), with a standard deviation of 0.9. Organisation & People is the best performing topic area, while Financial Disclosure & Lobbying delivers the worst average score.

Conclusion & Recommendations

All in all, the research indicates a high diversity in political governance systems in Belgium. It is true, that in comparison to other European countries, Belgium already has a strong legal environment as foundation for integrity and transparency. However, some areas are still largely un-addressed (e.g., Lobbying and Whistle-blower System). To work against this discrepancy and strengthen the Belgian political system, we propose four generic recommendations

- (1) Formal Policies & Standards: Extend the scope of impact for code of conducts and value considerations
- (2) Organization & People: Formalize recruitment processes and make integrity a valued criterion
- (3) Financial Disclosure & Lobbying: Document and disclose the lobbying affairs
- (4) Internal & Public Scrutiny: Proactively install whistle-blower mechanisms

Problem & Mission

High level of **transparency** and integrity within **parties** is key for a good political environment. However, the **status quo** on practices and sub-issues as well as **areas for improvement** remain **unclear**. Some parties may be unsure how to improve their governance in this dimension.




Conduct a **comparative analysis** by creating an **extensive benchmark framework**. The focus lies in understanding parties' **governance systems and policies** in place to fight corruption from within. The **ultimate goal** is to contribute to a **higher public trust level** in politics and deliver **actionable recommendations**.

Objectives

- **Design** methodically sound **framework** which enables consideration of multiple variables
- Conduct interviews with **Belgian parties** and **European best-practise parties**
- Enable **comparison** with **2019 survey**, performed by TI Belgium
- Present results in an **intuitive dashboard** that ranks Belgian political parties according to their efforts of becoming more transparent and trustworthy (see CPI or Trust Barometer)
- Deliver **actionable recommendations** for the political parties
- **Communicate** results to **TI Belgium, parties** and **general public**



Party Name: Sample			INTERVIEW EVALUATION SHEET						Date: 26/03/2022	
Topic	Question	Answer	Score	1	2	Possible Answers	3	4	5	
<div>Formal policies & standards</div> <div>  </div>	191	Do you have a code of conduct? If so, what is its content?	1	No code of conduct exists.	There are documents in place, which fulfil a similar role.	There is a code of conduct in place. However, it does not include the guidelines against corruption, conflict of interest, and influence peddling.	There is a code of conduct in place. However, it does not include the guidelines against corruption, conflict of interest, and influence peddling.	There is a code of conduct in place. However, it does not include the guidelines against corruption, conflict of interest, and influence peddling.	There is a code of conduct in place. However, it does not include the guidelines against corruption, conflict of interest, and influence peddling.	
	192	To whom does the code of conduct apply?	4	No members have to sign the code of conduct.	All the elected members/responsible have to sign the code of conduct.	All members of the party have to sign the code of conduct.	All members of the party have to sign the code of conduct.	All members of the party have to sign the code of conduct.	All members of the party have to sign the code of conduct.	
	193	Do party members have to disclose potential conflicts of interest? If yes, what information is collected or documented (e.g., previous employment, and/or unpaid outside positions, financial interests and double mandates)? How are private interests of members handled?	1	Private interests are neither disclosed nor documented. The party relies on the ethical code in place in the country.	Private interests are neither disclosed nor documented. The party relies on the ethical code in place in the country.	Private interests are neither disclosed nor documented. The party relies on the ethical code in place in the country.	Private interests are neither disclosed nor documented. The party relies on the ethical code in place in the country.	Private interests are neither disclosed nor documented. The party relies on the ethical code in place in the country.	Private interests are neither disclosed nor documented. The party relies on the ethical code in place in the country.	
	194	Are there any restrictions concerning potential employment or second conflict of interest? For whom are they applicable?	1	No guidelines or rules concerning potential employment or second conflict of interest for party members.	The party refers to legal frameworks and codes of conduct to guide party members to adhere to general regulations.	The party refers to legal frameworks and codes of conduct to guide party members to adhere to general regulations.	The party refers to legal frameworks and codes of conduct to guide party members to adhere to general regulations.	The party refers to legal frameworks and codes of conduct to guide party members to adhere to general regulations.	The party refers to legal frameworks and codes of conduct to guide party members to adhere to general regulations.	

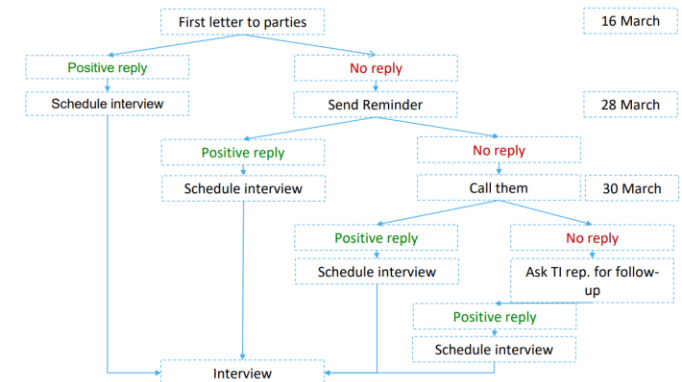
Framework

National Parties

- PTB/PVDA
- PS
- Vooruit
- Ecolo
- Groen
- Les engagés
- CD&V
- Défi
- MR
- Open VLD
- N-VA
- Vlaams Belang.

International Parties

- NEOS (Austria)
- Greens (Austria)
- CDA (Netherlands)
- EELV (France)



Plan for all the Interviews

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01 RESULTS – 2022



Results – Some Numbers

The 12 investigated parties scored 2.8 points on average

Who and What?

12 PARTIES INVESTIGATED

12 parties were investigated on their activities and engagement in anti-corruption policies.



THE SCALE GOES FROM 1-5 IN FOUR CATEGORIES

Parties' policies were classified in a framework scaled from 1 (insufficient) to 5 (best-in-class).

Scores

2.8 IS THE AVERAGE SCORE

Although the score is above half, meaning that the parties already have already effective anti-corruption mechanisms, there is still significant room for improvement.

0.9 IS THE STANDARD DEVIATION

The scores across the different parties differ significantly.

Categories



BEST PERFORMANCE

In the category "Organisation and People", the parties achieved an average score of 3.1. Meaning that, on average, party members are made aware of transparency.







WORST PERFORMANCE

In the segment "Financial Disclosure and Lobbying", the average score stands at 2.6.

The research focuses on four key topics that tackle various sub-issues

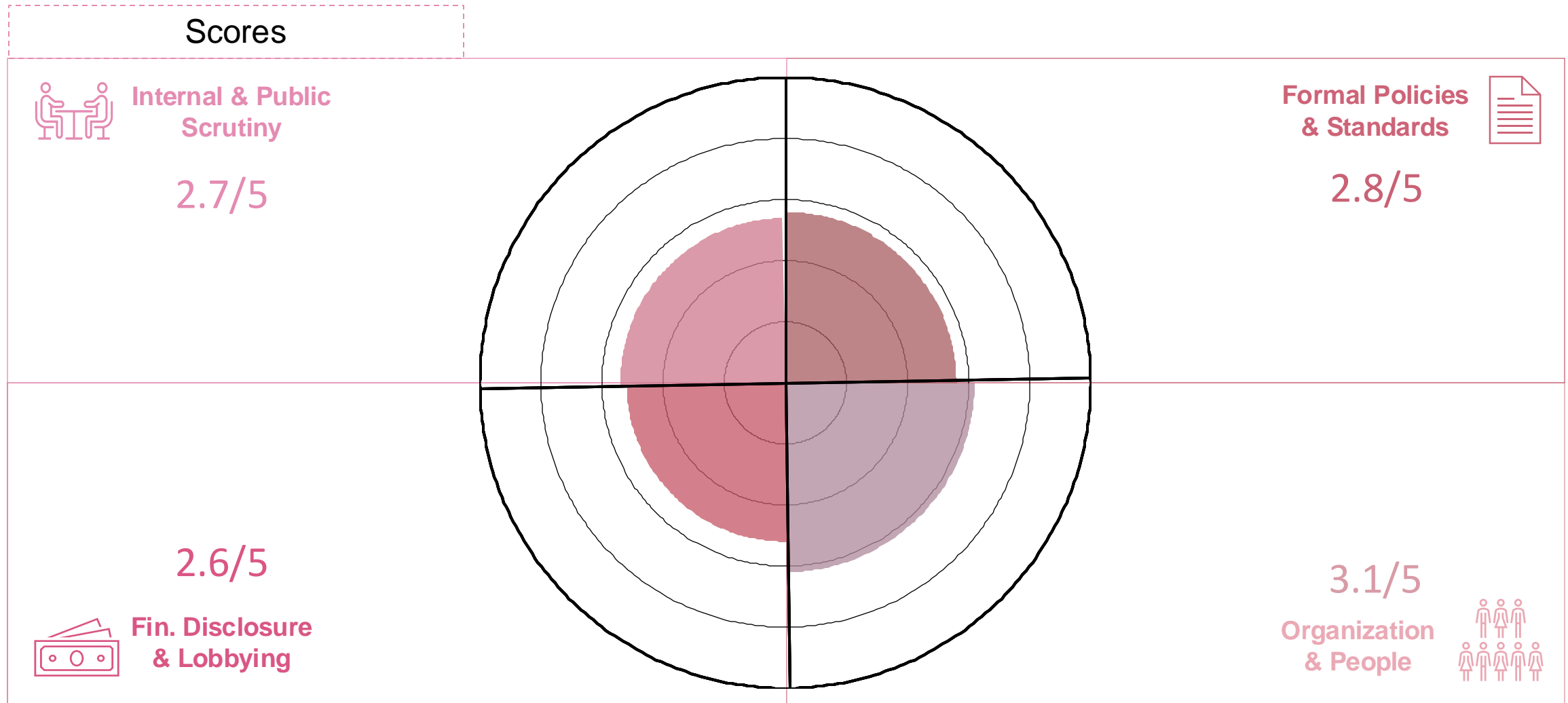
Recommendations	
<p>Internal & Public Scrutiny</p> <p>In this topic area, whistleblowing underperforms. As a matter of fact, only one party has a formalized program. In comparison, the Netherlands institutionalized whistleblowing. There, the “Whistleblower’s House” was established to provide confidential advice in both the private and public sector. The legal environment in Belgium should also promote whistleblower protection and parties should increase the salience of this issue by proactively speaking up.</p>	<p>Formal Policies & Standards</p> <p>Regarding the content and extent of the Code Of Conduct, parties performed well. However, the scope of application of the CoC seems restricted to parties’ representatives. Optimally the CoC should be applied to internal and external stakeholders, to further increase the impact. For example, a Belgian party has presented its effort to include CoC and value considerations also in the selection of business partners (e.g., suppliers of promotion material).</p>
<p>Transparent lobbyist relations represents a soft spot within this dimension. There is room for improvement. For instance, in Ireland, lobbyists must declare themselves as such on a designated website. There is a simple three step test available to find out if you are a lobbyist. Actively promoting a similar system can help safeguard the impartiality of the political system.</p> <p>Financial Disclosure & Lobbying</p>	<p>Recruitment procedures are, so far, not standardized. However, they are essential to attract the best talents and to maintain the reliability of the party. In France, a law, called “Loi Sapin”, forces parties to disqualify any candidate convicted of a criminal offence (e.g., bribery). In addition, other laws prevent favoritism and unjustified advantages. Belgian parties should recognize the value of transparency and foster adequate formalized recruitment processes in this regard.</p> <p>Organization & People</p>

This research focuses on four topics that each tackle various sub-issues

Description	
<div> Internal & Public Scrutiny</div> <p>This dimension investigates all options for stakeholders to contact parties’ representatives. Moreover, this topics scrutinizes the existence of an ethical committee and of whistleblower policies.</p>	<div>Formal Policies & Standards </div> <p>This dimension focuses on overall guidelines within the party. In particular, the content of a code of conduct and its scope of application are scrutinized. Moreover, private interests as well as policies on post-public employment are considered.</p>
<p>This dimension examines on the one hand income and expense policies of the parties and on the other hand the interactions with representatives of interests (lobbyists).</p> <div> Financial Disclosure & Lobbying</div>	<p>This dimension analyses the presence of procedures related to the awareness and communication (internal and external) of integrity-related issues. In this respect, this category examines the recruitment process, the offer of workshops, guidance and the use of communication channels.</p> <div>Organization & People </div>

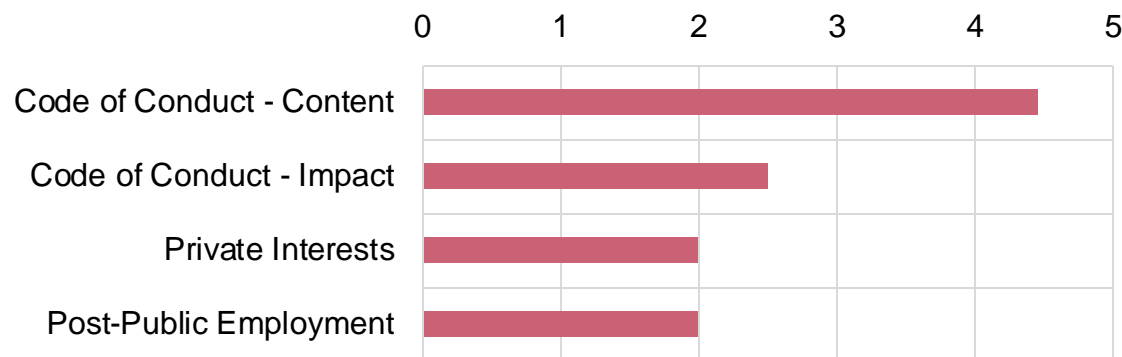
Overview of Categories – Scores

On average, parties scored above 2.6 in every category.





2.7 FORMAL POLICIES AND STANDARDS



Is there a code of Conduct? How extensive is it?



To whom does it apply?



How are private interests collected, disclosed and documented?



What are the restrictions concerning post-public employment?



The party that scored **best** in this category was **Vooruit** with an average of **3.5**.



The party that scored **worst** in this category is **Ecolo** with an average of only **2.0**.



- **Median** = 2.0
- **Outlier:** Question 101 "Code of Conduct - Content" with an average score of 4.5
- **Standard Deviation**= 0.46



Implication: The majority of parties (75%) has an extensive CoC in place. However, the scope of its impact is limited. Particularly, private interests and post-public employment appear under-addressed.

In-depth results show that guidance & support is a strong focus of parties

3.1 ORGANIZATION & PEOPLE



The party that scored **best** in this category was **Ecolo** with an average of **4.5**.



The party that scored **worst** in this category is **Groen** with an average of only **1.8**.



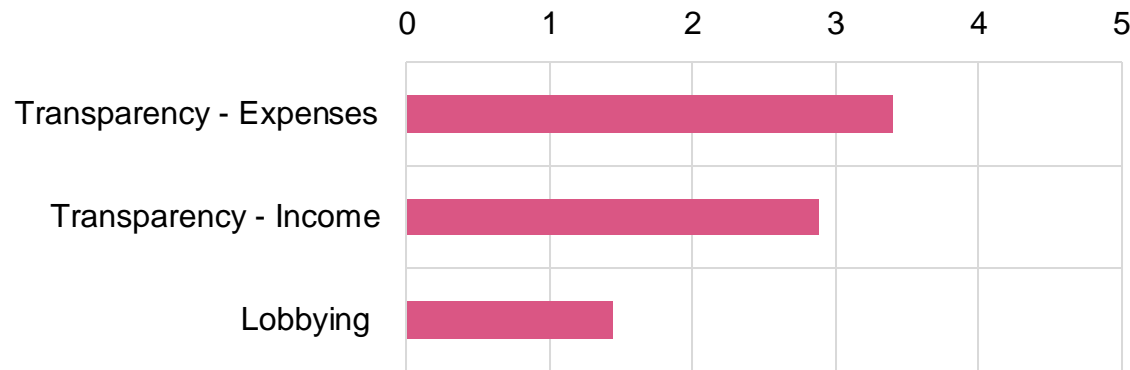
- **Median** = 3.0
- **Outlier**: Question 301 "Guidance & support" with an average score of 4.0
- **Standard Deviation**= 0.81



Implication: Organization & People is the strongest category. This shows the interest of parties to foster integer organisational cultures. Nevertheless, recruitment and communication processes have room for improvement.

In-depth results show that lobbying is a pressing issue in this category

2.6 FINANCIAL DISCLOSURE & LOBBYING



In what detail are financial expenses disclosed to the public?

How are incomes such as donations handled and disclosed?

How transparent are contacts with interest representatives?



The party that scored best in this category was **Vooruit** with an average of **3.7**.



Parties that scored worst are **PTB/PVDA, NVA & Les engagés**, with an average of **2.0**.



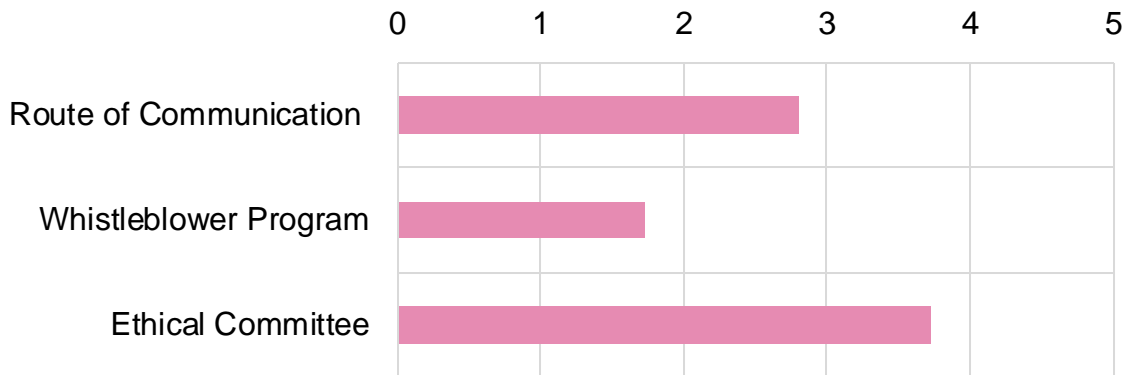
- **Median** = 2.5
- **Outlier**: Question 303 "Lobbyin" with an average score of 1.4
- **Standard Deviation**= 0.55



Implication: The legal environment in BE already provides a strong starting point for this category. However, hardly any party goes beyond legal requirements. The essential topic of lobbyism remains critically underaddressed.

In-depth results show that the party performance varied strongly in this category

2.8 INTERNAL & PUBLIC SCRUTINY



- In what ways can stakeholders contact politicians or the party?
- Is there a whistleblower program in place and how does it work?
- Is there an ethical committee? What powers does it possess?

The party that scored best in this category was **Vooruit** with an average of **3.7**.

The party that scored worst in this category is **PTB/PVDA** with an average of **1.7**.

- **Median** = 3
- **Outlier:** Question 402 “Whistleblower Program” with an average score of 1.7
- **Standard Deviation** = 0.6

Implication: Almost all parties have installed a proper ethical committee (2/3 of all parties). Still, whistleblowing policies remains drastically under-represented. A tool which can help parties in exposing wrongdoing.

Results – Performance Tiers

According to their scores, the parties can be arranged in three tiers

Performance Tiers

High Score
(Score > 3,0)



Medium Score
(2,5 < Score <= 3,0)



ecolo



Low Score
(Score <= 2,5)



Best & Worst



Best performance
Avg. Score = 3.6



Worst performance
Avg. Score = 2.3

02 RESULTS – 2019







The 2019 Survey overlaps with the 2022 Survey on 4 topics

2019 Survey

Anti-corruption	Does your CoC cover anti-corruption?
Conflict of interest	Does your CoC cover conflict of interest?
Influence peddling	Does your CoC cover influence peddling?
Guideline promotion	How do you promote/communicate your guidelines and policies?
Whistleblower program	Does your party have a whistle-blower program installed?
Ethical/Legal committee	Does your party have an ethical committee in place?

2022 Survey

Question 101: Code of Conduct - Content		
Question 204: Communication & Promotion		
Question 402: Whistle-blower Program		
Question 403: Ethical Committee		

In comparison to 2019, only small rates of improvement can be observed

2019 and 2022 in comparison

Questions	Avg. Improvement
Question 101: Code of Conduct - Content	↑ 0,6
Question 204: Communication & Promotion	↑ 0,7
Question 402: Whistleblower Program	↑ 0,2
Question 403: Ethical Committee	→ 0

Most improved
($0,5 < \Delta$)



Slightly improved
($0 < \Delta \leq 0,5$)



Not improved
($\Delta = 0$)



ecolo



03 REPORTS







04 CONCLUSION & OUTLOOK



What is the way forward for increased transparency within Belgian parties ?

Situation

- Belgian regulations include good practices (e.g. law of 4 July 1989 – financial disclosure & law of 2 mai 1995 on mandates disclosure)
- In other areas, no/few regulations are in place



Challenge

- Parties interpret the law and have mechanisms in place. Our research helped to understand the status quo
- But parties lack resources (e.g. financial and/or knowledge) and standardized processes



Communicate

< 1y

To the general public (general report made anonymous). To all parties (specific and general reports). To all European Chapters (open-source our questionnaire).

Purpose : raising awareness

Advice

≈2y

At party-level, help to implement our recommendations. Main areas are increasing the frequency and quality of workshops about integrity and extend the scope of application of the CoC.

Purpose : enhance prevention

Promote

> 5y

At federal-level, lobby to implement standardized procedures on whistleblowing and on representatives of interest.

Purpose : raise awareness and enhance prevention

Outlook and Way Forward – Two options

In order for TI Beligum to move forward, two approaches may be pursued



One-stop-shop



Achieve a broad reach by tackling the most pressing topics on an inter-party level



- Promote a whistle-blower system and lobbying prodedures on the gov. level
- Communicate broadly to the public



Scope: **easy** to 'catch them all'



Time/reach ratio: **very high**



Ease of implementation: **easy**



Effectiveness: **unclear**



Focus First



Help the lowest performing parties to improve by actively working and focusing on them



- Offer a one-to-one talk with in-depth explanation of the results
- Help party to implement new structures



Scope: **small**



Time/reach ratio: **middle**



Ease of implementation: **easy**



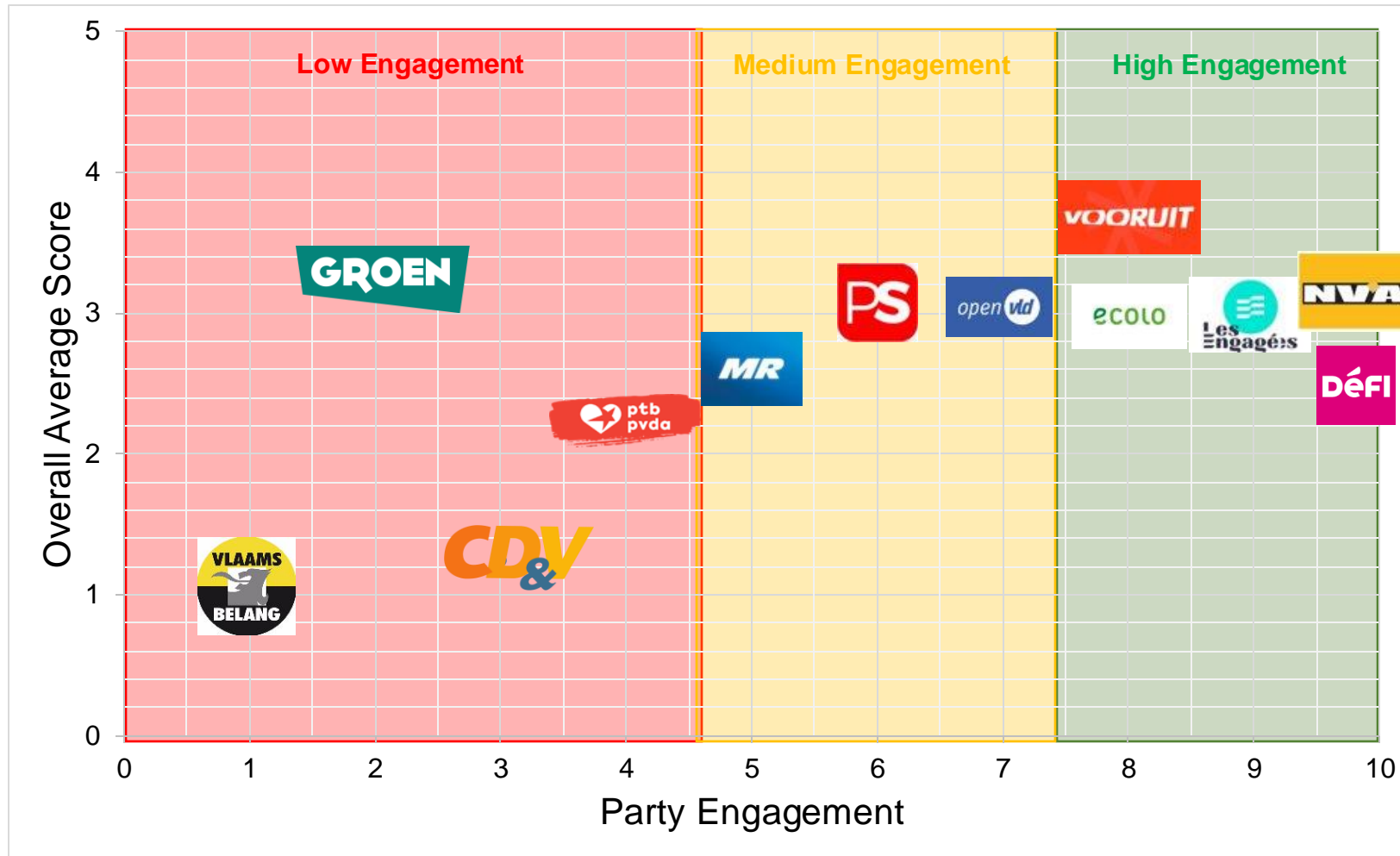
Effectiveness: **very high**

Recommendation: Focus where necessary, combine where possible

We propose sharing resources and opt for a joint-approach as both areas are focal for overall improvement

Outlook and Way Forward – Materiality Analysis

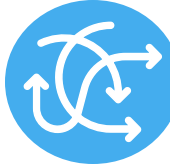
Engaged parties with a low score represent a good target group for TI



Target Parties

- 1st DÉFI
- 2nd ecolo
- 3rd Les Engagés
- 4th NVA
- 5th VOORUIT

Limitations and solutions are both at research and project levels



Limitations

Our work

1. Limited resources: time, expertise and information
2. Language barrier (between analysts and parties)
3. Potential bias in analysis
4. Limited insights on governance mechanisms within parties during 60-minute interviews



Our solutions

1. Efficient time allocation and sharing insights with peers
2. Interviews in English or usage of online translators
3. Guided by TI BE, experts and parties
4. In-depth research : academic papers, legal bases, definitions and political websites

The Project

1. Constraints of parties: budget, workforce, priorities,...
2. Parties face difficulties to implement good practices
3. Difficult to evaluate the real need and the added-value
4. Parties fear to share its practices and information openly (detailed expenses, lobbys,...)



1. Motivate parties and explain advantages of participation
2. Identify most relevant practices and ensure feasibility
3. Continuous follow-up and implement trial-error principle
4. Show parties the difference between information as a competitive advantage and needed for transparency

05 REFLECTION & LEARNINGS



In the course of the project, we encountered different steps of progress



Easy Wins

- Team work
- Conducting interviews
- Efficient communication

Challenges

- Feelings of overwhelmment
- Scheduling Interviews
- Analyse interviews

Learnings

- Deep-dive into new topic
- Understanding and knowledge how to approach tasks
- Being analytical and methodological

Future

- Apply our learning in future projects
- Prevent the challenges we have had
- Keep in mind the importance of transparency and integrity in an organisation

THANK YOU FOR YOUR
ATTENTION!





06


APPENDIX 01




Formal Policies & Standards – Possible Scores & Answers

Topic	Question		Possible Answers				
			1	2	3	4	5
Formal policies & standards 	101	Do you have a code of conduct? Is it extensive?	No code of conduct exists nor similar documents.	Documents are in place which fulfill a similar role.	The code of conduct only includes guidelines on one or two of the relevant topics (anti-corruption, conflict of interest, influence peddling).	The code of conduct includes all relevant topics.	The code of conduct is extensive and is part of the statutes.
	102	To whom does the code of conduct apply?	No members have to sign the code of conduct.	All candidates (<i>a fortiori</i> elected members) and executive suite have to sign the code of conduct.	All members of the party have to sign the code of conduct.	All members of the party and external stakeholders (e.g., business partners, affiliated companies etc.) have to sign the code of conduct.	All the members of the party and external stakeholders have to sign the code of conduct. Additionally, the code of conduct plays a crucial role in the partner selection.
	103	Do party members have to disclose private interests? If yes, what information is collected or documented (e.g., previous employment, paid or un-paid outside positions, financial interests and double mandates)? How are private interests of members handled?	All public officials (representatives) must publish to the Court of Audit their list of mandates, functions and professions and declaration of assets relating to the mandates exercised in the year preceding the publication. Source : https://www.ccrek.be/FR/ and http://www.ejustice.just.fgov.be/eli/loi/1995/05/02/1995021222/justel and mandates cumulations http://www.ejustice.just.fgov.be/eli/decret/2010/12/09/2010206369/moniteur	Beyond the declaration, representatives have to sign that there are no conflicts of interest.	Private interests are disclosed, documented and monitored. Indeed, the Court of Audit is not responsible for guaranteeing the completeness and accuracy of the statements submitted. The Court of Audit does not check compliance with the rules on remuneration and the accumulation of mandates.	Private interests of executives and representatives are disclosed, documented and monitored.	There is a holistic concept in place to avoid conflicts of interest (of representatives and executives). Private interests are disclosed, documented, continuously monitored and audited (for representatives). Furthermore, there are clear and standardized processes in place to safeguard public interests (e.g., standardized documentation awareness).
	104	Are there any restrictions concerning post-public employment to avoid conflict of interest? For whom are they applicable?	No guidelines or rules concerning post-public employment are in the code of conduct.	The party refers to legal frameworks and urges party members to adhere to general regulation (about conflict of interest).	Party raises awareness around the topic of post-public employment. For example, the party's code of conduct formulates clear guidelines for post-public employment.	There are guidelines and restrictions in place. However, they are only applicable to parts of the organisation or they are not communicated extensively.	There are guidelines and restrictions in place for the entire organisation which clearly show the interest of the party to prevent conflict of interest stemming from post-public employment. It is communicated, monitored and audited. A time-period is clearly stated.

Topic	Question		Possible Answers				
			1	2	3	4	5
Organisation & People 	201	What measures or criteria secure the integrity of the recruitment process and the job candidates?	There are no measures in place to secure the integrity of job candidates.	There are no written or explicit measures to secure integrity within the recruitment process, but there are some informal measures (e.g., interview questions concerning integrity or personality tests).	There are some measures in place to secure integrity. For instance, a background check will be carried out (e.g., validity of information) or there is a clear recruitment path in place that follows predetermined criteria.	There are various measures to secure integrity within the recruitment process. Amongst other things, a background check is part of it. Additionally, there is a clear recruitment path in place that follows predetermined criteria.	The organisation appears to have a clear and extensive combination of measures in place to secure the integrity of the candidates (e.g., background checks or case study). There are criteria that require special attention (e.g. if a close family member is already part of it) than can become drop-out criteria. Although the request for a criminal record is not legal (source: https://justice.belgium.be/fr/themes_et_dossiers/documents/demande_des_documents/extrait_de_casier_judiciaire), the party asks the candidate to answer a questionnaire including questions on criminal background and integrity.
	202	Do you offer any workshops or similar events to build awareness for integrity or related topics (e.g., moral dilemmas, conflict of interests, ethics)? And if yes, is it voluntary or mandatory to participate? How often?	The organisation does not organise or intend to organise any events related to integrity standards or ethical conduct.	Until now, there have not been any workshops on the topic. However, there is a clear intention to organise such events in the future (e.g. before the next elections).	There have been workshops that focus on promoting integrity. However, they are not actively promoted and not regularly conducted. Mostly they are conducted on special occasions e.g. scandals, elections.	There are regularly workshops on different topics of integrity. However, participation is voluntarily. The speakers are experts coming from the outside.	The organisation regularly organises mandatory workshops or trainings to promote integrity standards or ethical conduct with external experts.
	203	Is there a way for members to ask questions or seek guidance about integrity or dilemmas they are facing?	There is no committee or person in place that acts as contact person for members that seek ethical guidance or have legal questions.	There is a committee or person in place that acts as contact person for members that seek ethical guidance or have legal questions.	There is a committee or person in place that acts as a person for members that seek ethical guidance or have legal questions. This function is included in the job description (and objectives) of these persons. This service is actively promoted, accessible and known by members.	There is an accessible committee or person in place that acts as a person for members that seek ethical guidance and it is kept highly confidential (if needed).	There is a dedicated committee or person in place that acts as contact person for members that seek ethical guidance or have legal questions. The entity has the necessary competences (updated with trainings, previous experience in related area, ...), resources (access to lawyers, experts,...) and financial means to help the members with their questions or inquiries. All members are informed by these possibilities and it is easily accessible and available. It is kept highly confidential (if needed).
	204	Where and how do you communicate integrity policies e.g. code of conduct? Do you use internal or external communication channels?	The organisation does not offer any publicly accessible information on their integrity and transparency concept mainly because they don't have any integrity policies.	The organisation offer publicly information on their integrity or transparency concept. However the information is hard to find (no button on the welcome page). Internally, these information are promoted at a minimal level of effort (e.g., it is not promoted throughout the whole organisation or not regularly).	The organisation offer easily accessible information on integrity and transparency on their website. Internally, there appears to be no clear concept behind the promotion.	Integrity policies are communicated internally and externally. Internally, integrity policies are communicated regularly and throughout the whole organisation.	The organisation offers information on integrity and transparency on their website. It is very detailed and extensive and there is the possibility to ask further questions. There is a holistic promotion concept in place (regularity, ...) which includes internal and external communication (e.g., internal newsletter, business partners, and Website).

Topic	Question	Possible Answers				
		1	2	3	4	5
Financial Disclosure & Lobbying 	301 Do you disclose your financial expenses to the public (e.g. during political campaigns)?	The annual accounts are not published in accordance with the law of the 4th of July 1989 on the limitation and control of election expenses and on the financing and open accounting of political parties (namely chapter IV). Source : http://www.ejustice.just.fgov.be/eli/loi/1989/07/04/1989000418/justel	The financial reports follow the law of 4 July 1989 but do not respect the deadlines provided by this law and/or is not audited and/or is not publicly available and/or not consolidated.	The financial reports are published according to the law of 4 July 1989 (timely manner, consolidated, audited and publicly available).	The financial reports are published according to the law of 4 July 1989 (timely manner, audited and publicly available). These reports are available on their website.	The financial reports are published according to the law of 4 July 1989 (timely manner, audited and publicly available). These reports are available on their website. In addition, a supplementary report detailing all individual expenses (amount and description) is publicly available.
	302 How do you handle incomes (e.g., subsidies or donation)? Do you disclose them publicly? Is there a maximum amount individuals can pay?	The party does not follow the law of 4 July 1989 chapter 3 on the financing of political parties. Source : https://www.ejustice.just.fgov.be/eli/loi/1989/07/04/1989000418/justel	The party follows the law of 4 July 1989 chapter 3 on the financing of political parties. Each donation exceeding 125 eur must be registered (maximum 500 eur per person for a party and 2000 eur per person for all parties annually). Donations from legal entities can only be made via sponsorship (the amounts are the same as for individuals).	This list, required by law, is accessible on the political party's website. The statement mentions the full name of the natural person who made the donation, his or her full address (street, number and municipality of the main residence), his or her nationality, the amount of each donation, the date on which it was received and the total amount of all donations that were received during the past year as provided for in Article 16ter.	The party regularly reminds its members of these regulations (and the maximum they can receive), notably in its statutes and via internal communications.	Some individuals or companies that do not correspond to the ethical rules of the party (not respecting their code of ethics) cannot make a donation as foreseen by the law of 4 July 1989. A party that has decided not to accept any private or corporate donations (included in their statutes) will be considered the most prudent in terms of integrity and conflict of interest (not required condition to score 5).
	303 Are there any measures in place to make the contact of party members with interest representatives (lobbies) more transparent (e.g., documentation, guidelines, etc.)?	Contacts of party members with lobbyists or company representatives are not monitored or documented at all. There are no guidelines safeguarding an ethical conduct within such meetings.	The organisation collects documentation but it is neither extensive, publicly available nor is it actively monitored. There are no lobbying specific guidelines but there are related documents for guidance or the organisation refers to legal regulations.	The organisation collects documentation and actively monitors it. However, it is only internally available. There are some lobbying related guidelines in place. However, they are not extensive.	Contact details of lobbyists are recorded and made publicly available in a timely manner. There is no exact information of meeting content or scope of interests. There are lobbying specific guidelines in place. Still, they are not promoted or monitored.	Contacts of party members with lobbyists or company representatives are actively monitored, updated and documented (e.g., identification of lobbyists, declaration of interests, stating company that is represented, meeting minutes, public officials involved). The company proactively discloses any relationships with companies. There are clear guidelines or other measures in place to safeguard an ethical conduct within such meetings.

Topic	Question		Possible Answers				
			1	2	3	4	5
Internal & Public Scrutiny 	401	Is there a way for stakeholders to contact politicians or the party? Is there a particular point of contact for complaints? If yes, is the process clear on your website? How fast is feedback and criticism incorporated or responded to? Internal vs. external focus?	There is no standardized form of contact and no designated person or department responsible for responding to public inquiries. Contact information of party members is not publicly available.	General contact details as well as party member responsibilities are presented on the website. However, there is no designated department handling the inquiries/criticism. Confidentiality is not considered. Feedback is collected but never truly reviewed or considered in a timely manner.	There is a standardized form of contact available for internal and/or external stakeholders. Feedback is collected and considered by the party. However no concrete actions are taken subsequently.	There is a standardized form of contact available for internal and external stakeholders. Feedback is collected and considered by the party. On an individual base, feedback has an effect. On an organisational level, the feedback has no effect.	There is a standardized form of contact available for internal and external stakeholders and a designated department or person in charge of handling the received messages. The critics are considered and if needed discussed at a higher level or transferred to an ethical committee/department. Feedback is reviewed and acted upon in a timely manner. The feedback tool is actively promoted by the party.
	402	Whistleblower program: Are there any procedures on how to report misconduct? If yes, how are they structured? Is it possible to be anonymous? Is it dealt with confidentially?	There is no whistleblower program in place or it is not at all communicated by the party.	There is no designated whistleblower program in place. However, there is an alternative route of communication which aims to fulfill a similar goal. There is awareness around this route of communication.	There is a whistleblower program. However, it is not actively used or promoted. There is no clear information on how it works. The program is also available to external stakeholders.	There is a whistleblower program. It is anonymous and hints are treated confidentially. Furthermore, responsible persons are easily reachable. Members are aware of the program. The program is also available to external stakeholders.	There is a whistleblower program in place. It is anonymous (if needed) and hints are treated confidentially. Furthermore, there is a clear structure and responsible persons are easily reachable. Participants can speak off the records and are protected from any repercussions. All members of the party are aware of the program and there appears to be a clear promotional concept. The agency covers the costs of legal protection. The program is also available to external stakeholder.
	403	Is there an ethical committee or similar department in place for auditing the integrity of the organisation? Does the committee/department have the means and position to impose sanctions in the case of misconduct? If not, who can?	There is no committee or department in place for auditing the integrity of the organisation.	There is an internal committee or department in place which is made up of party members. The committee has no power in case of violation of the code of conduct.	There is a no independant committee in place and have the power to impose sanctions but the sanctions consist mainly of warnings	There is no independant committee in place that regularly monitors and audits the integrity of the organisation. This committee has the power to impose sanctions ranging from a simple warning to the expulsion of a party member.	There is an independant committee in place that regularly monitors and audits the integrity of the organisation. This committee has the power to impose sanctions ranging from a simple warning to the expulsion of a party member.

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APPENDIX 02





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APPENDIX 03



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