Asset and Interest Disclosure (AID) Systems in EU Member and Candidate States

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Good Practice Guide for Transparency Enhancement and Corruption Prevention

Regional Anti-Corruption Initiative Secretariat

Centre for Security and Crime Sciences - University of Trento and University of Verona

Center for the Study of Democracy

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Asset and Interest Disclosure Systems in EU Member and Candidate States
Good Practice Guide

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Project: qAID - Towards contemporary knowledge and innovative tools for assessing and enhancing effectiveness of Asset and Interest Disclosure (AID) systems in EU Member and Candidate States

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1. Introduction

Asset and Interest Disclosure (AID) systems are increasingly becoming one of the most important multipurpose tools used worldwide to prevent and combat corruption in the public sector[1]. AID systems aim to build a culture of integrity, foster public officials' accountability and promote the public's trust[2], by collecting information about public officials' assets, incomes, revenue streams, expenditures and activities, to inform on existing or potential conflicts of interest. Based on each country's specific needs, disclosure systems may be aimed at identifying conflicts of interest, detecting illicit enrichment, or at both. Such objectives are reflected in the structure and contents of the declaration forms and disclosure obligations[3].

The implementation by State Parties of effective measures for public officials to disclose and provide information related to their activities and financial interests, such as AID systems, is strongly encouraged by articles 8(5) and 52(5) of the UN Convention Against Corruption (UNCAC), since they may lead to the identification of potential conflicts of interest or reveal instances of corrupt behaviour by public officials. Within the European Union, article 3(3) of the recent proposal for a "Directive on combating corruption" establishes the need for Member States to "ensure that key preventive tools such as [...] effective rules for the disclosure and management of conflicts of interests in the public sector, effective rules for the disclosure and verification of assets of public officials [...] are in place"[4].

Project qAID has explored in-depth the structure and functioning of AID systems in EU Member and Candidate States, through an online survey and a series of semi-structured interviews involving representatives from national anti-corruption and transparency bodies. Specifically, the activities of the project have focused on three main aspects of AID systems: i) their features and operational dynamics; ii) the structure and implementation of risk-analysis mechanisms, to develop a standardised EU risk-analysis framework; iii) the procedures in place to assess the effectiveness of AID systems.

As a result of the different activities carried out, the research teams were able to identify best practices and recommendations for the effective implementation of AID systems in EU Member and Candidate States. This report aims at presenting the developed best practices, by focusing on the implementation of AID systems. Moreover, drawing on the developed standardised EU risk analysis framework, it suggests a roadmap for implementing automated and digital risk analysis declarations. Lastly, it presents recommendations and best practices covering the assessment of the impact of AID systems, to ensure their effectiveness.

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[1] ROSSI, I., POP, L., BERGER, T., Getting the Full Picture on Public Officials: How-To Guide for Effective Financial Disclosure. StAR Initiative, 2017.

[2] JENKINS, M., Income and Asset Disclosure: Topic Guide. Transparency International, 2015; StAR Initiative, Public Office, Private Interests: Accountability through Income and Asset Disclosure. StAR Initiative, 2012.

[3] POP, L., KOTLYAR, D., ROSSI, I., Asset and Interest Disclosure: A Technical Guide to an Effective Form. StAR Initiative, 2023.

[4] EUROPEAN COMMISSION, Proposal for a Directive of the European Parliament and of the Council on combating corruption, replacing Council Framework Decision 2003/568/JHA and the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union and amending Directive (EU) 2017/1371 of the European Parliament and of the Council, COM(2023) 234 final, 2023/0135 (COD), Brussels, 03.05.2023. Available online at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A234%3AFIN.

Project qAID – Towards contemporary knowledge and innovative tools for assessing and enhancing effectiveness of Asset and Interest Disclosure (AID) systems in EU Member and Candidate States

General objective

The general objective of project qAID is to provide EU Member States (MSs) and Candidate States (CSs) with contemporary knowledge and innovative tools to assess and improve the impact of national asset and interest disclosure (AID) systems. The project aims to be the first comprehensive EU project to address the systems of AID in EU MSs and CSs and identify avenues to make them more effective and efficient. The general objective will be reached by:

i. Identifying **best practices** and effective (including automated and digital) systems and processes through structured evaluation process;

ii. Developing a **standardised EU risk analysis framework** to strengthen filters for declarations and prioritise verification, along with a roadmap for implementing automated and digital risk analysis of declarations of assets and interests of relevant public officials in EU MSs and CSs;

iii. Developing a **comprehensive toolkit to measure the impact** of asset and interest disclosure systems in EU MSs and CSs;

iv. **Disseminating the new knowledge** and developed tools among national stakeholders in EU MSs and CSs.

Specific objectives

To achieve its aim, the project sets itself the following specific objectives:

i. Develop and promote an integrated approach to measuring progress and assessing the impact of AID systems in EU Member and Candidate States;

ii. Promote the implementation of best practices and data exchange on AID systems in EU Member and Candidate States (with a particular focus on risk analysis, including automated and digital, to filter declarations and prioritize verification);

iii. Enhance the capacity of anti-corruption institutions in dealing with asset and conflict of interest disclosure in EU Member and Candidate States.

Project partners

Beneficiaries

Centre for Security and Crime Sciences (CSSC) | ITALY [Coordinator]

Regional Anti-Corruption Initiative (RAI) Secretariat | BOSNIA-HERZEGOVINA

Centre for the Study of Democracy (CSD) | BULGARIA

Agenția Națională de Integritate (ANI) | ROMANIA

Associated partner

Autorità Nazionale Anticorruzione (ANAC) | ITALY

Funding

European Commission (Directorate General for Migration and Home Affairs) – ISF Programme 21-27

Website

https://rai-see.org/qaid/

2. Best practices for implementing AID systems

The implementation of AID systems in EU Member and Candidate States was explored as part of WP2 *"Inventory and analysis of the current state of AID systems in EU Member States and Candidate States and identification of best practices"* of the qAID project.

Drawing on the results of an extensive desk research and literature review, complemented by the examination of secondary sources and consultation with project partners, the research team developed an online survey. The survey was intended to gather detailed information on the functioning of existing AID systems and provide a better understanding of their key features and operational dynamics. The questionnaire was organised into four thematic areas, investigating: i) the main characteristics of AID systems; ii) the existing mechanisms to verify the disclosed information; iii) the risk analysis processes implemented (with specific attention to their extent and nature—automated or not—, particularly in relation to digitalisation); and iv) the methods employed to assess the impact of AID systems, including the availability and use of relevant data.

Thanks to the collaboration of the project partners and the support of the European Network Against Corruption, responses to the survey were collected from anti-corruption and transparency bodies in 19 countries (11 Member and 8 Candidate States)[5]. The results from the survey allowed to map AID systems in EU Member and Candidate States and develop best practices for the implementation of AID systems[6]. This section presents the relevant best practices, stemming from the analysis of the survey results. The information collected was complemented with data gathered through desk research and analysis of secondary sources (e.g. institutional reports and policy briefs).

2.1 Best practices from the countries responding to the qAID survey

Main features

According to the professional opinion of the experts surveyed, national AID systems should feature the **electronic submission (e-filing) of declarations**. Indeed, the availability of an electronic submission platform allows to access and fill out the form remotely. Moreover, it facilitates compilation of the form and collection of information, especially when the system allows to access pre-populated files. In this instance, the declarant is generally required to only check the information, and amend, correct or update it if necessary: while reducing the effort required to the filer, this also lowers the risk of submitting incomplete declarations. Electronic submission is the first necessary step towards the implementation of a completely automated system.

The collected **information should be made available to the public**, thus contributing to the **transparency** of the system (see Box below). The online publication of the submitted declarations supports easier access—and thus external checks—by the general public, NGOs and journalists, for long periods of time (in some cases, up to 15 years). The digitalisation of the submission systems, moreover, allows the

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immediate publication of the submitted declarations. Lastly, the **extension of the declaration requirements to a wider range of public officials** (in some cases, to all those potentially affected by corruption) has been identified in certain countries as a best practice to be implemented across EU Member and Candidate States.

> ### Box 1 - Transparency of declarations
>
> Transparency is widely recognized as a cornerstone of anti-corruption strategies, yet the extent to which asset and interest declarations are made publicly available varies significantly across national legal systems, with more democratic states tending to adopt more comprehensive publication requirements. Empirical evidence suggests the existence of an inverse relationship between the public accessibility of public officials' asset and interest disclosed data and perceived corruption level[7]; greater openness facilitates monitoring carried out by citizens and strengthens institutional accountability within the public sector. This is further confirmed by UNCAC, which explicitly designates transparency as a fundamental preventive value (article 5, par. 1).
>
> Nevertheless, the pursuit of transparency inevitably intersects with privacy and safety rights, obliging legislators to clearly delineate the scope of disclosed information while safeguarding personal data protected by national and European legal frameworks.
>
> The results of the qAID project revealed how, in almost all countries surveyed (Members and Candidates alike), the publication only covers specific information: for instance, it does not extend to sensitive and personal data which, if published, could endanger the declarants or their family and would not be relevant to the scope of transparency (and AID systems more in general) as preventive measures against corruption. Conversely, four countries feature the publication of all information covered by the declaration.
>
> In sum, while publication provisions can amplify social control and exert constructive pressure on civil servants' institutional mandates, policymakers must calibrate these principles against privacy considerations to ensure compliance with European data-protection standards and to preserve of disclosure regimes.

Verification of declarations

Once submitted, the declarations should be verified, to ensure the input data is accurate. A comprehensive process, featuring monitoring and verification of all declarations submitted, is likely to enhance the overall effectiveness of the system.

To support the verification process, it is crucial to **cross-check the information**, by accessing public and private registries. This allows the verification agency to cross-reference the contents of the declarations with external sources of information, to ensure their completeness and truthfulness. The availability of financial information provided by banks appears to be of relevance. Additionally, the use of **automated verification systems** and the **interoperability of different systems and databases** have been identified by experts as a relevant best practice.

Lastly, violations and non-compliance detected during the verification process should be followed by the **provision of clear and effective sanctions**, to strengthen the systems' deterrence against corruption.

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[7] DJANKOV, S., LA PORTA, R., LOPEZ-DE-SILANES, F. AND SHLEIFER, A. "Disclosure by Politicians", NBER Working Paper 14703, 2009.

In the case of risk analysis, there is no agreement in the identification of best practices, which differ significantly from country to country. The best practices identified by the different respondents, in relation to their own country, are listed below.

- **Assigning points to the different risk indicators, to determine which declarations to verify** — using weighted points for various risk indicators helps prioritize which declarations should undergo verification.

- **Performance of own risk assessment by each administration** — each administration performing its own risk assessment ensures a tailored approach.

- **Flexibility of the system, which facilitates changing the risk assessment criteria** — the system should allow for adjustments in risk assessment criteria based on emerging trends or issues.

- **Collective effort to establish risk areas** — collaborating across institutions to identify key risk areas strengthens the risk assessment process.

- **Logical and arithmetic control of the declarations** — tools that perform logical and arithmetic checks on declarations further enhance the verification process.

Assessment

The results of the survey have evidenced how the assessment of systems is generally overlooked. Therefore, it is especially difficult to identify common best practices. The first—and crucial—step would be to design a mechanism or a procedure to evaluate and measure the impact of the systems, as well as their ability to achieve the proposed results. The only indication emerging clearly from the countries implementing some form of impact assessment is to **feature data** resulting from **journalistic investigations**, and **reports from NGOs and relevant civil society actors**.

2.2 Best practices from secondary sources

The Group of States against Corruption (GRECO) is tasked with the analysis and assessment of countries' compliance with specific provisions of the Twenty Guiding Principles (and associated provisions of the Criminal Law Convention on Corruption), by conducting periodic evaluation rounds[8]. A report is drafted at the end of each one, including recommendations to improve each country's level of compliance. Reports from the Fourth and Fifth Evaluation Round were analysed to identify such recommendations, in relation to the implementation of AID systems.

Most indications align with those suggested by the experts from national anti-corruption agencies. More specifically, GRECO recommends **extending the obligation to disclose** to spouses and dependent family members of the declarant or at least including them in the declaration. This measure should however comprise the necessary safeguards, to protect their privacy. Regarding the identification of the categories of individuals required to declare, the creation of a **central register of persons exercising top executive functions** (PTEFs) could streamline the disclosure process. Moreover, proper checks of the declarations should clearly be ensured by establishing an **independent review mechanism** equipped with adequate

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[8] For more information about GRECO's mutual evaluation and its role in fighting corruption, please visit https://www.coe.int/en/web/greco/evaluations/about.

legal, technical, and operational resources to **ensure effective and accountable oversight**. This could also be achieved through a robust and effective **cooperation and interaction** with all relevant control **bodies and/or databases**, as well as the publication of statistics on the outcomes of the reviews. In the event of a breach, the competent authorities should impose a **proportionate and dissuasive sanctions**. To ensure the effectiveness of criminal investigations and prosecutions involving high-level officials suspected of corruption, and to uphold prosecutorial integrity, the authority must be **independent**. If cases of corruption are discovered, it is important to ensure the competent bodies/agencies are equipped with sufficient technical and financial resources, as well as with specialised personnel and the necessary autonomy to effectively conduct the investigation and prosecute offenses. Finally, it is of particular relevance to **engage with the public and ensure transparency**, by making all information from the declarations publicly available.

The United Nations Office on Drugs and Crime (UNODC), together with the United Nations Interregional Crime and Justice Research Institute (UNICRI), has developed a technical guide to the implementation of the United Nations Convention Against Corruption[9]. Section IV of the Technical Guide is dedicated entirely to disclosure systems and gives indications as to what features the systems should have, and what measures should be in place to ensure the implementation of the principles and rules set in UNCAC. These recommendations and guidelines partially overlap with those outlined by GRECO.

As a fundamental principle of the public administration activity, authorities must ensure the **transparency and impartiality of provisions** (e.g. by giving general publicity to the provision of public services and the publishing of anti-fraud and corruption policies and codes of conduct). Consequently, public officials must be able to access information and guidance on how to act in the event of a potential conflict of interest. Similarly, regulations must cover all significant types of assets and incomes, as well as all significant types of conflicts of interest, and establish appropriate procedures following their detection. As previously mentioned, the legal system is responsible for identifying of **competent bodies to investigate possible violations and for establishing appropriate deterrent sanctions** in the event of a violation of the laws and regulations on a case-by-case basis. To this end, **adequate control powers** should be attributed to the competent authorities, and they should be provided with sufficient manpower, expertise, technical capacity and legal authority. The aim is to avoid concealment of assets and interests by public officials, also by covering individuals and legal entities connected to them. With this purpose, UNODC recommends dedicating special attention to the **detection of gifts and hospitalities** and provide **specific guidelines** to public officials detailing **how and when they should declare them**.

Lastly, the Technical Guide encourages all State Parties to the Convention to "*have in place institutional means for revising codes, monitoring implementation and related issues*"[10].

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[9] UNODC, Technical Guide to the United Nations Convention Against Corruption. New York, 2009.

[10] *Ibidem*.

3. Best practices for implementing a standardised EU risk analysis framework and roadmap for automated and digital AID systems

As part of WP3 *"Development of a standardized EU risk analysis framework to help filter declarations and prioritize verification and of a roadmap for implementing automated and digital risk analysis of declarations of asset and interest"*, the mechanisms of risk analysis implemented at national level were analysed in-depth.

Semi-structured interviews were conducted with representatives from anti-corruption and transparency bodies in those countries implementing risk analysis mechanisms[11]. The results, combined with extensive desk research, provide useful indications to develop guidelines and general principles for a standardised EU risk analysis framework and roadmap for implementing automated and digital systems[12]. A detailed analysis of the national experiences reveals a heterogeneous landscape and several differences among national systems. In each country, the risk analysis mechanism implemented is currently highly specific and adapted to its unique context. Consequently, a uniform and rigid model applicable across all EU Member and Candidate States does not seem to be the best solution or fit well with the described situation. Nevertheless, despite such inherent diversity, a standardised risk analysis framework can indeed be developed: it should strive to achieve an adequate level of harmonisation through a set of general principles and guidelines that should allow each country to tailor their risk analysis mechanisms to their country-specific features, needs and operational environments.

The following suggestions and general principles are thus to be interpreted within this framework, and thus not as a rigid set of rules to be uniformly applied across EU Member and Candidate States alike.

3.1 Standardised EU risk analysis framework

A robust risk analysis mechanism should adhere to and incorporate the following general principles.

- **Risk-based approach.** AID systems must be inherently risk-based, prioritizing proactive and substantive control of declarations, particularly those submitted by persons with top executive functions (PTEFs). This involves real-time identification of potential red flags, thus moving beyond purely formalistic or reactive checks, which should be followed by in-depth verification.

- **Public database interoperability.** An effective risk analysis mechanism requires the integration of multiple databases. This enables the identification of specific risk indicators, such as individuals holding multiple roles, significant changes in assets or income, or discrepancies in property ownership, shares, loans, or other financial factors. The detection of red flags can trigger in-depth reviews. International cooperation is also essential to ensure interoperability across national borders for tax, property, company, and employment records.

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[11] In total, ten (10) countries were covered: Bulgaria, Georgia, Germany, Italy, Latvia, Moldova, Montenegro, Romania, Serbia, Ukraine.

[12] The full report is available at: https://cssc.unitn.it/wp-content/uploads/2025/08/qAID_D3.1_Report-on-risk-analysis-framework-and-digitalisation.pdf

- **Efficient system architecture**. To tailor a methodology that can guarantee flexibility and prompt adaptation to specific national needs, national risk analysis systems design should either facilitate collaboration and comparison among different administrations through centralized access to information or, conversely, simplify processes by assigning clear responsibility and accountability to individual administrations, potentially distributing control for enhanced effectiveness.

- **Strong internal oversight and resources.** Adequate human and financial resources, along with strong internal oversight mechanisms, are crucial for fairness and consistency, especially within key bodies like National Anticorruption or Integrity Agencies.

- **Continuous learning and international cooperation.** The development and strengthening of national risk criteria and overall systems benefit significantly from seeking guidance and sharing best practices with international partners, particularly countries with well-developed anti-corruption systems like Ukraine. International benchmarking and studying advanced models are strongly recommended.

- **Transparency.** As evidenced above, an advanced AID system should be transparent enough to allow citizens to scrutinize public officials' declarations, fostering accountability and public trust. Greater public access to aggregated control statistics is also advocated.

- **Digitally supported mechanisms.** Digitalisation is a cornerstone of modern AID systems. This includes leveraging electronic submission and checking of declarations, implementing IT tools for verification and reporting, and developing machine-readable data for continuous system training. However, automation supports but does not replace human analysis. That is why a mixed-method risk analysis model, combining IT tools and manual intervention, could ensure accuracy and comprehensive coverage while overcoming the limitations of each method.

3.2 Roadmap for implementing automated and digital AID systems

Digitalisation is strongly supported as a fundamental pillar of modern AID systems, significantly enhancing efficiency and better investment of limited human resources. The implementation of an automated risk analysis system draws on insights from various national experiences, offering crucial benefits regarding cost-effectiveness and reduced manual labour.

Key automated functionalities and implementation strategies include:

- **Electronic submission and verification**. Systems should enable the electronic submission—preferably through pre-compiled forms—and automated checking of all declaration items. E-filing declarations streamlines the process of submission, ensuring higher levels of compliance, allows better data management, swifter and more effective reviews, and facilitates publication.

- **IT tools for verification and reporting**. Leveraging IT tools for in-depth verification and systematic reporting is an essential component of a digital risk analysis system.

- **Machine-readable data.** Data should be machine-readable to facilitate continuous system training and analysis.

- **Automated data checking and prioritization.** Automated tools are vital for checking all declaration items, automatically grouping and prioritizing declarations that present higher risk or multiple "red flags".

- **Red-Flags and cross-checks.** Automated red-flag detection algorithms and cross-checks with other government registers are crucial. Algorithms, along with data-matching with public registers and prioritization mechanisms, greatly improve the efficiency of verifications, leading to a higher rate of identifying irregularities.

- **Interoperable systems and integration with external data.** Implementing electronic submission platforms and interoperable systems allows for better integration of financial, property, and employment databases, which is essential for identifying high-risk declarations. International cooperation can further facilitate this by enabling AID systems to communicate effectively with records not only nationally but also across borders, particularly in an increasingly globalized context. Integration with external data—both governmental and non-governmental—allows to draw a clearer and more exhaustive picture; however, it should be implemented gradually, to allow familiarisation with the different databases and their resources.

The experience of Ukraine provides a compelling example of the benefits of such digitalization, demonstrating significant improvements in cost-effectiveness and reductions in manual labour. Ukraine's advanced models illustrate how technology and intelligent system design can transform risk analysis mechanisms into powerful tools for corruption prevention and institutional integrity.

4. Best practices for assessing the impact of AID systems

It is recommended that evaluation teams treat Asset and Interest Disclosure (AID) systems as policy interventions whose success is judged by **observable changes in behaviour, institutional practice and public accountability**. According to the *qAID methodology*, impact assessment must combine legal-institutional mapping, operational diagnostics and outcome measurement so that recommendations follow directly from evidence. The guidance below aligns impact assessment with the risk-analysis and digitalisation priorities set out earlier and offers a compact, operational approach for national adaptation.

4.1 Purpose, scope and guiding principles

It is advised that assessment teams begin by defining purpose and scope against three priority questions:

- Is the AID system **operating as designed** (coverage, submission, basic checks)?
- Is it **changing behaviour** or **institutional practice** (improved filing accuracy, remediation, referrals)?
- Which system features **drive the observed effects** (automation, inter-agency data exchange, publication practices)?

Assessments should be calibrated to system maturity: early-stage systems prioritise detection and data quality; intermediate systems emphasise conversion rates; mature systems emphasise deterrence, remediation, enforcement outcomes and public-trust metrics.

Guiding principles for design and execution of evaluations include:

- **Outcome orientation.** Focus on behavioural and institutional change (e.g., improved compliance, verified detections, remediation) not only on activity counts.

- **Context sensitivity.** Tailor indicators, thresholds and interpretation to legal frameworks, system architecture and data availability.

- **Methodological transparency.** Document definitions, data sources, indicator construction, red-flag logic and data quality limitations so findings are reproducible and defensible.

- **Participatory approach.** Validate interim findings with oversight bodies, prosecutors, IT staff, CSOs and journalists to build legitimacy and practicality.

- **Ethics and data protection.** Apply GDPR-aligned anonymisation, secure storage and disclosure-risk review so assessment processes do not create harm.

4.2 Core assessment components and analytical rules

It is recommended that evaluators organise the assessment of the efficiency of AID systems around six interlinked components that convert raw data and qualitative insight into actionable findings.

- **Legal-institutional baseline.** Verify who must declare, fields required, filing cycles, sanctioning powers and legal limits on registry access. Record admissibility constraints that affect evidence use.

- **Operational diagnostics.** Extract system logs and operational statistics (submission volumes, automated flags, verification actions, referrals, staffing, processing times). Map pre-population, e-filing and LAC (logical/arithmetic control) practices.

- **Outcome measurement.** Apply a two-tier indicator set (implementation and impact). Include conversion ratios and median times between steps.

- **Data triangulation.** Reconcile administrative statistics with registry matches (tax, property, companies), prosecution registers and structured external signals (media/CSO alerts). Score each indicator by data availability and quality before analysis.

- **Qualitative validation.** Conduct targeted interviews (oversight, prosecution, IT, CSOs, journalists) to explain anomalies, surface bottlenecks and test causal inferences.

- **Policy mapping.** Explicitly link observed gaps to feasible remedies (API links, red-flag recalibration, publication rules, staff allocation).

Focus is advised to be placed on two tiers of indicators:

- **Implementation indicators (process and capacity).** Submission compliance rate; % of declarations processed by automated checks; number of external registers linked; staff-to-declaration ratio; average days to complete a content verification; number and type of sanctions applied.

- **Impact indicators (outcomes).** Improved filing accuracy and timeliness; increase % of declarations with suspicious findings (in new, not mature AID systems); number of investigations/referrals triggered by AID checks; public engagement metrics (portal visits, information requests); evidence of conflict-of-interest remediation carried out; number of joint investigations and data exchanges; policy reforms triggered by AID findings.

System statistics are to be collected as a primary source; where unavailable, survey proxies are to be used but there is a need to flag limitations clearly.

4.3 Reporting, validation and follow-up

It is advised that evaluators produce concise, policy-focused outputs that translate evidence into a clear set of sequenced actions. These evaluation reports should be written for decision-makers and operational partners. Short, evidence-led documents increase the likelihood that findings are understood, accepted and acted upon. Equally important is building a validation loop with responsible institutions and civil society so that conclusions reflect operational realities and recommended reforms are feasible within existing legal and technical constraints.

Thus, reporting and validation should include:

- **Short assessment report (5–12 pages).** Deliver a compact report that foregrounds the key findings, explains the data and confidence levels, and immediately links each finding to one or more concrete, sequenced reforms. Each recommended reform should include an estimated lead institution, a short list of required actions (technical/legal/organisational), and an indicative

timeline (quick win; medium term; long term). Use annexes for technical detail, data tables and the full methodology so the main text remains accessible to non-technical readers.

- **Executive dashboard**. Produce a one-page dashboard with headline metrics and a one-line confidence note for each metric. Recommended dashboard items: submission compliance rate; % of declarations flagged; conversion rate (flagged and then verified; conversion rate verified and then referred for investigation; median time from referral to investigation; portal engagement - visits/requests). Where possible present year-on-year trends and simple visual cues (improving/steady/worsening) so readers can grasp performance at a glance.

- **Validation workshop**. Convene a short multi-stakeholder workshop (oversight authority, prosecution, IT and HR staff, CSOs, journalists) to present provisional findings, test interpretations and agree priority actions. Use the workshop to reconcile administrative divergences, surface legal constraints that may prevent specific reforms, and secure written commitments on next steps or data provision where needed.

After the validation workshop, it is recommended that AID systems, red-flags, internal procedures and public outreach are improved through several sequenced follow-up actions:

- **Remedy immediate data gaps**. Require investigative units to produce the agreed minimum administrative dataset on an annual basis. Provide a simple template and short guidance notes; pair this with a commitment to a confidential data exchange for the first year so partners can validate formats and address legal concerns.

- **Iterative tuning of red-flag thresholds**. Use the initial assessment's verification outcomes to recalibrate automated thresholds and scoring weights. Implement a short feedback loop (quarterly review for the first year) so automated triage progressively improves precision and reduces false positives.

- **Pilot interoperable data exchanges**. Run a time-limited pilot linking the AID platform to a small, high-value set of external registers (tax, land, companies) for a defined sample of high-risk declarations. Evaluate the pilot's impact on detection and workload, resolve API/legal issues, and produce a scaling plan only once data quality and privacy protections are demonstrated.

- **Institutionalise annual public performance summaries**. Publish an annual, aggregated performance report with headline indicators, anonymised case studies illustrating remediation and enforcement, and a short assessment of data confidence. Use public summaries to increase transparency and to create external incentives for improved compliance and institutional cooperation.

4.4 Mitigation of common challenges

Evaluation teams are encouraged to embed a short mitigation plan in the inception phase. Mitigation plan components could include:

- **Fallback indicators and data priorities**. Rank proposed indicators by feasibility and data quality; define fallback proxies (survey measures, expert elicitations) for key gaps and state clearly which findings rely on proxies.

- **Escalation and sponsorship**. Identify senior sponsors within partner institutions who can intervene where lower-level gatekeeping occurs and set expectations for timely access to essential data and registers.

- **Secure communications and data handling**. Agree secure channels and a minimum standard for data encryption, access control and temporary storage. Document anonymisation steps and retention limits.

- **Whistleblower and source protection.** Include a protocol for handling sensitive tips and whistleblower information, specifying how such signals are logged, authenticated and protected during analysis and reporting.

- **Legal and MOUs.** Where data sharing is sensitive, prepare short MOUs or data-processing agreements that clarify responsibilities, permitted uses and publication constraints; where cross-border queries are needed, document the legal basis and contact points.

In addition, it is recommended that evaluators use concrete country examples not merely as illustrations but as operational benchmarks that inform realistic targets and phased implementation plans. Benchmarks help set expectations about achievable conversion rates, typical time lags and the likely resource implications of automation and interoperability.

Box 2 - Benchmarking approach

- Select a small set of comparator models that match the assessed system's maturity and legal context (for example, Ukraine's NACP model for high volume automated scoring; France's HATVP for layered review and contradictory procedures).
- Compare key metrics (conversion rates, time to action, share of automated flags requiring manual follow up) and identify which practices are transferable and which require legal or resource changes.
- Use benchmarks to set phased targets: short term (improve data quality and basic LAC checks), medium term (introduce weighted scoring and targeted API links), long term (scale interoperable exchanges and publish aggregated remediation outcomes).

As a result, impact assessment should feed an iterative learning cycle: monitor outcomes, refine algorithms and red-flag rules based on verification feedback, and update indicators and public metrics as data quality improves. Establish an annual review rhythm that combines technical calibration (IT teams and data scientists), operational reflection (verification teams and prosecutors) and public accountability (CSOs and journalists). Over time, this cyclical process will help transform AID systems from static filing regimes into adaptive instruments that detect, deter and remediate illicit enrichment.

5. Conclusions

The implementation of asset and interest declaration (AID) systems in EU Member and Candidate States appears to be fragmented, with each country presenting specific features, depending on their needs and priorities. Nevertheless, certain aspects related to the implementation, risk analysis, and assessment of AID systems emerge as best practices across national experiences.

The in-depth analysis of the identified best practices highlights four interrelated pillars for the development and implementation of effective AID systems:

1. **Transparency.** The availability of declarations to the public fosters accountability and public trust, by allowing the public to access and check them. Despite its relevance, it is imperative that transparency and publicity be balanced with safeguards to the privacy and safety of the declarants, and other individuals covered by the disclosure.

2. **Digitalisation.** Each phase of the declaration, from submission to verification and publication, can be streamlined by the introduction of digitalised elements. The need to move towards automated systems emerges clearly from the results of the project activities. Indeed, it supports the filer in filling in the declaration, ensuring completeness, it allows for swifter risk-analysis and streamlines verification through cross-checking of information and interoperability of systems.

3. **Risk-based approach.** The effective implementation of AID systems requires the verification of the submitted declarations, to ensure compliance and the application of sanctions, in case of breaches. Given the limited availability of resources, the verification process should be risk-based, to prioritise proactive control, and move from the development of red flags.

4. **Assessment.** To ensure the effectiveness of AID systems, and their ability to achieve the expected outcomes, it is critical to adopt a structured methodology guiding their assessment, and determining whether they operate as expected and can streamline the changes envisioned.

Effective prevention of corruption through the implementation of AID systems relies on digitised and interoperable systems, capable of ensuring comprehensive verification and compliance with provisions. Policymakers should thus invest in automation of the systems, development of red flags and extensive transparency at national levels, to ensure involvement of the public.

Recommendations | Summary

Four interrelated pillars for effective AID systems

Transparency	Digitalisation	Risk-based approach	Assessment
The public availability of declarations fosters trust and accountability. Despite its relevance, balancing it with safeguards to the privacy and safety of those involved is crucial.	Each phase of the declaration, from submission to verification and publication, can be streamlined by the introduction of digitalised elements.	The effective implementation of AID systems requires a risk-based verification of the submitted declarations, to prioritise proactive control, moving from the development of red flags.	To ensure the effectiveness of AID systems, and their ability to achieve the expected outcomes, it is critical to adopt a structured methodology guiding their assessment, and determining whether they operate as expected and can streamline the changes envisioned.

Main features

- Electronic filing (e-filing) of declarations
- Transparency and public availability of information
- Extension of declaration requirements to a wider range of public officials
- Automated verification systems
- Provision of clear and effective sanctions

Risk analysis mechanism

- Efficient systems architecture
- Electronic submission and verification
- Digitally supported systems for verification and reporting
- Automated data checking and prioritization
- Red-flags and cross-checks
- Public database interoperability and integration with external data
- Internal oversight and resources
- Continuous learning and cooperation

Assessment

- Structured and replicable methodology (see the qAID Methodological Toolkit)
- Clear identification of expected outcomes
- Participatory approach
- Data triangulation and qualitative validation
- Identification of implementation and impact indicators