



High Authority
for transparency
in public life

ACTIVITY
REPORT
2023

Summary

Role and missions of the High Authority

The High Authority for Transparency in Public Life is an independent administrative authority, which role is **to guarantee public integrity**.

The institution **accompanies and controls public officials and lobbyists daily**, in order to provide citizens with the assurance that public decisions are made in the general interest.

The missions of the High Authority are structured around four main areas:

- The control of the **declarations** of assets and interests
- The prevention of **conflicts of interest**
- The control of **revolving-door movements** between the public and private sectors
- The regulation of **lobbying**

Interview with Didier Migaud

President
of the High Authority
for Transparency
in Public Life



The year 2023 marked the ten-year anniversary of the laws of 11 October 2013 relating to the transparency of public life: what progress do you note by France since then in terms of preventing attacks on integrity?

Didier Migaud: The laws of 11 October 2013 relating to the transparency of public life clearly marked a new stage. They were the achievement of a long reflection and a progressive movement to strengthen the requirements for transparency in the public sphere.

It is important to highlight the progress made over the past ten years. The creation of the High Authority in 2013, then of the Central Office for the Fight against Corruption and Financial and Tax Offenses and the National Financial Prosecutor's Office the same year, followed by the French Anti-Corruption Agency in 2016, contributed to strengthen significantly the prevention of breaches of probity and the fight against corruption in France.

A paradox remains: while these prevention and repression measures have been significantly strengthened, citizens' trust in public decision-makers remains low. That said, and this is an encouraging factor, studies reveal that when citizens are more informed about existing controls, their lack of trust decreases. Transparency is a factor of trust which calls for continuous communication and awareness-raising actions. It is crucial to explain that control mechanisms exist and that reprehensible acts – which remain isolated – do not go unpunished. Likewise, it must be emphasized that a large number of data relating to the prevention of conflicts of interests and the fight

against corruption is regularly made public by the High Authority, for the benefit of all. We also see the interest they arouse on a daily basis, with an average of 250,000 visits per month to our website.

In this context, how do you view the action of the High Authority and its role in public life?

D. M. : The High Authority is now well identified in the French institutional landscape, with a positive dynamic and the confidence of the legislator, who regularly assigns it new missions. It has become an essential trusted third party between public decision-makers and citizens, and the preferred contact for public officials, elected officials and administrations on ethical issues. By helping to prevent integrity breaches, the High Authority fulfils an essential mission in a democracy, which is to strengthen citizens' trust in institutions and public officials.

To achieve this objective, the High Authority has several levers at its disposal. First of all, transparency, although this is not an end in itself and must be supplemented by awareness-raising and educational initiatives designed to strengthen knowledge and appropriation of the obligations weighing on public officials. Then there is publicity. We must ensure that the data made public is readable and useful to citizens. Finally, the

effectiveness of controls, which remains a fundamental issue and which the various proposals in this report aim to strengthen. I am thinking, for example, of the granting of a power of administrative sanction in the event of failure to meet the requirements with the obligation to submit a declaration, or of improving our means of investigation thanks to a right of direct communication.

To conclude, I consider that after ten years of existence, it has become necessary to question the resources available to the High Authority to ensure not only its independence but also of its capacity to carry out all of its missions, which are becoming ever more extensive at the heart of our democratic system. To achieve this, additional human and budgetary resources appear essential.

How has the institution supported local actors, and in particular elected officials, in implementing the developments that have taken place in recent years in terms of preventing breaches of integrity?

D. M. : For the past two years, the systems intended to prevent breaches of integrity at the local level have been significantly strengthened, contributing to the dissemination of a culture of integrity at all levels of public action. I am thinking, first of all, of the so-called “3DS” law which made it possible to clarify situations of conflicts between public interests when elected officials sit within external bodies. Since 1st June 2023, each elected official can also consult an ethics officer, responsible for advising them on meeting the requirements of ethical principles that apply to them. The year 2023 is also that of the implementation of the extension of register to influence actions carried out towards local authorities in particular. This development further highlights the inadequacies and legal limits of the system, already identified by the High Authority.

Transparency in public life is a pillar of strengthened citizen trust in their institutions and in their elected officials. For this reason, we

must pursue our missions tirelessly. Ethics calls for constant reflection, individually and collectively. In 2023, the High Authority continued to provide permanent support to guarantee compliance with reporting obligations and disseminate good ethical reflexes, particularly at the local level: trainings for elected officials and public officials to present our doctrine in matters of conflicts of public-public interests, publication of new guidelines for lobbyists, organisation of webinars for declarants and ethics officers of elected officials... In France, but also on a European scale, actions of influence and interference by foreign states represents a real democratic challenge.

How does the High Authority position itself on this issue?

D. M. : The multiplication of actions of influence and interference exercised by foreign states, their lack of traceability and their complexity pose significant risks to national democratic processes. The current missions of the High Authority – in particular those of regulating lobbying and controlling revolving-door movements between the private and public sectors – place it in an interesting position to hold structured information on foreign influence. The tools it makes available to the public – such as the register of lobbyists, the publication of declarations of interests and a growing number of opinions issued on projects of revolving-door movements – can help to highlight this influence.

This role explains why, in 2023, it was regularly asked to express itself on this issue, transversal to its missions, in particular with regard to ongoing debates to develop the legal framework in place, in France and in the Union European. The High Authority instructed the OECD to submit a report analysing the French legislative and institutional framework, and to formulate concrete solutions to regulate this influence. A bill initiated by the president of the National Assembly’s law committee, currently being examined in Parliament, could entrust the High Authority with a new mission in this area.

Key figures for 2023


COLLEGE

13 
members

ADMINISTRATIVE AND FINANCIAL MANAGEMENT

9.6 M€
Budget

TRANSPARENCY

2.7 
million
of pages viewed
on hatvp.fr

71 
permanent
staff
(as of 31 December 2023)

ADVICE AND SUPPORT

More than
7,000 
calls and e-mails
handled in support of public
officials and lobbyists

35
external
presentations

MONITORING THE SITUATION OF PUBLIC OFFICIALS

8,816
declarations received



700
reminders

136
injunctions

17
cases referred to the courts for **failure to file declarations**



3,536
declarations checked



56%
Initial declarations fully meet the requirements of completeness, accuracy and sincerity

44%
Amending declarations requested

1.5%
Reminders of reporting obligations or assessments on a declaration made public

DECLARATIONS OF INTERESTS



More than

3 out of 10 declarations

led the High Authority to request **measures to prevent** conflicts of interest

ETHICAL CONTROL OF PUBLIC SERVANTS AND OFFICIALS

438



**opinions issued
on projects
of revolving-
door movements
between the public
and private sectors**



18%

**Opinions
of compatibility**



77%

**Opinions
of compatibility
with reservations**



5%

**Opinions
of incompatibility**

CONTROLLING REVOLVING-DOOR MOVEMENTS



**Nearly
80%
Compatibility
opinions
with reservations**

**7.2%
Incompatibility
opinions**



REGULATING LOBBYING

2,968

entities listed
in the register
of lobbyists

(as of 31 December 2023)

5



formal notices
to comply
with declarative
obligations

13,579

activities reported
on the directory
of lobbyists

(for the 2022 financial year)

6



cases referred
to court
for non-filing
of declarations

197

controls closed



120

controls of
non-registered entities

58%

resulted in a registration
on the directory

75

controls
of declarations

100%

resulted in the regularisation
of the declaration

Ten years, an overview in figures

18,000

public officials
subject to control
of their interests
and assets

15,000

public officials
subject to control
of revolving-door
movements

3,000

lobbyists
registered
in the directory



More than
100,000

**declarations
of assets
and interests**
received



More than
1,800
**controls
of revolving-
door**
movements

Around
800

**inspections
of lobbyists**
launched
(non-registered,
declarations
of activities
and means,
ethical
obligations)



Around
250
ethical
opinions



More than
250
cases referred
to **court**

Nearly
70,000
activities
declared
by lobbyists

2023, ten years of “transparency” laws

An institution serving citizens’ trust in public action

The creation of the High Authority for Transparency in Public Life, by the organic and ordinary laws of 11 October 2013, is the culmination of a long reflection and a progressive movement to strengthen the requirements for transparency in the public sphere.

The end of the 1980s and the beginning of the 1990s marked the opening of a first “ethical moment” with the creation of several institutions in charge of combating breaches of integrity by public officials: the National Campaign Accounts and Political Financing Commission, the Civil Service Ethics Commission and the Commission for Financial Transparency in Political Life. The latter, established in 1988, had the mission of controlling the assets declarations filed by the highest public officials at the beginning and end of their functions, in order to identify possible variations likely to reveal an illicit enrichment. In practice, this system, like the resources granted to this commission, proved to be very insufficient.

While various actors had already highlighted the inadequacies of the enforced systems, the revelation, in 2013, of bank accounts hidden abroad by a member of the Government caused a public uproar. This case highlighted the need to review fundamentally the legal framework for guaranteeing probity, preventing corruption and punishing financial offenses.

The legislator took up these issues and the laws on transparency of public life of 2013 created the High Authority, an independent administrative authority. The action of the High Authority complements other major institutions in the fight against breaches of integrity, created the same year: the Central Office for the Fight against Corruption and Financial and Tax Offenses¹ and the National Financial Prosecutor’s Office².

Endowed with its own powers, the High Authority has been, from its origins, responsible for ensuring the completeness, accuracy and sincerity of declarations by public officials. As part of the control of their asset declarations, it has the right to request the transmission of data from the tax administration and can implement a right of communication in order to obtain any information necessary for its

1. Decree No. 2013-960 of October 25, 2013 establishing a central office to combat corruption and financial and tax offenses

2. Law No. 2013-1117 of December 6, 2013 relating to tax fraud and serious financial delinquency, organic law No. 2013-1115 of December 6, 2013 relating to the financial public prosecutor

control. The High Authority is also entrusted with a mission of preventing conflicts of interest, the ordinary law of 2013 defining for the first time the notion as a “situation of interference between a public interest and public or private interests which is likely to compromise the independent, impartial and objective exercise of a function.” To this end, it has a power of injunction to put an end to conflict of interest situations and can issue opinions aimed at preventing them.

Subsequently, the legislator entrusted the High Authority with new missions. First of all, the law of 20 April 2016 on civil servants’ ethics, rights and obligations, broadens the scope of controls concerning public officials. Then, the law of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, known as the “Sapin II” law, charged the High Authority with a new mission of regulating lobbying. Then, the law of 15 September 2017 for trust in political life formalises the competence of the High Authority to verify any situation likely to constitute a conflict of interest during a change of Government.

Finally, the law of 6 August 2019 on the transformation of the civil service considerably broadens the field of competence of the institution in terms of supervising revolving-door movements between the public and private sectors. In addition to controlling former members of the Government, former local executives and former members of independent administrative or public authorities willing to join the private sector, as entrusted in the law of 2013, the High Authority now also controls the revolving-door movements of civil servants exercising strategic functions. This mission was previously led by the Civil Service Ethics Commission which has been dissolved.

Thus, the High Authority is today the reference institution for preventing conflicts of interest in public life and the privileged partner of public officials and administrations on questions of ethics. It is also better identified by citizens, who are demanding with the quality and relevance of the controls carried out. If only 38% of French people had already heard of the High Authority in 2021, this figure rises to 43% in 2022. It has been demonstrated that providing citizens with better information plays a key role in their perception of the institution and its missions³, and has an impact on decreasing their mistrust towards institutions and public officials.

The High Authority also benefits from international recognition. As a pioneer in its field⁴, the High Authority is widely considered to be a model, which explains why it is systematically consulted during discussions within the European Union. It is also a central player in various European networks for public ethics or the fight against corruption and is regularly contacted by foreign countries wishing to draw inspiration from the French system of integrity and transparency.

After ten years of existence, it is necessary to question both the relevance of the scope of control of the High Authority, the use and usefulness of the data made public by the institution and finally its means which ensures its independence. In order to carry out all of its missions, the High Authority must have new means of action and investigation, which necessarily require additional human and budgetary resources.

3. Jean-François Kerléo and Benjamin Monnery, “Probity and transparency in Parliament: assessment and lessons from a decade of changes around the HATVP”, *French Review of Public Administration*, n° 184, 2024/4, p. 1097-1113

4. European Parliament, resolution of 16 September 2021 on strengthening the transparency and integrity of the Union institutions through the creation of an independent European body responsible for ethics issues, 2020/2133(INI)

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Supporting, advising and raising awareness to disseminate a culture of integrity

The High Authority assists public officials and lobbyists on a daily basis in complying with their obligations. It supports them, trains them, advises them and raises their awareness of ethics during many external presentations. It also responds to a growing number of requests from its French and foreign contacts, which allows it to enrich its action and share its expertise.

Continuous support for declarants

Political and electoral news (election to the Assembly of French Polynesia, ministerial reshuffle, senatorial elections) justified particular support for public officials in 2023. Also, the High Authority organised targeted campaigns to raise public officials' awareness of their declarative and ethical obligations (outgoing senators, new senators, leaders of the sports sector).

Concerning lobbyists, information sessions were also organised to make them aware of their

reporting obligations but also introduce them to the new guidelines on lobbying published by the High Authority to consider the extension of the register of lobbyists at the local level.

In 2023, the High Authority's departments handled 7,000 calls and emails as part of its mission to assist and counsel public officials and lobbyists.

A constantly increasing ethical advising activity

The High Authority issued 27 ethical opinions intended to advise public officials (local elected officials in particular) or institutions which had spontaneously requested it on a confidential

basis. Now well identified by administrations and local authorities, it is often consulted well in advance to discuss any difficulties they may encounter.

Wide dissemination of the expertise of the High Authority

Following the entry into force of the so-called “3DS” law, the High Authority clarified its policy by publishing two deliberations relating to the new legislative provisions, accompanied by a table⁵ of risks and recusals to be implemented depending on the various bodies in which local elected officials may sit.

In 2023, the High Authority also increased the publication *in extenso* on its website of ethics opinions concerning revolving-door movements, in particular those relating to the advisers to the President of the Republic and members of ministerial cabinets.

In 2023, the High Authority significantly strengthened its educational and awareness-raising actions (35 external presentations

with elected officials or students, compared to 29 in 2022). In addition, it communicates informally on a daily basis with public actors in charge of ethics.

The High Authority awarded its Research Prize to Antoine Oumedjkane, for his public law thesis “Compliance & administrative law”. The “10 years of the High Authority” Prize was awarded to Jean François Kerléo and Benjamin Monnery for their article “Probity and transparency in Parliament: assessment and lessons from a decade of changes around the HATVP”, published in 2022 in the *French Review of Public Administration*.

Promoting the French public integrity model abroad

The High Authority is also committed to disseminating a culture of integrity at the international level. As a privileged interlocutor on ethical issues at the European level, the High Authority takes part in discussions on the proposal for an inter-institutional European ethics body, or on the proposal for a European directive on

the representation of interests carried out on behalf of third countries.

In order to identify best practices and promote its expertise, it received 21 delegations in 2023 (compared to 11 the previous year).

5. hatvp.fr/presse/le-conflit-dinterets-publics-apres-la-loi-3ds/

Controlling the assets and interests of public officials to preserve the integrity of public action

FOR WHAT PURPOSE?



To **act as a trusted third party** by providing citizens with guarantees of integrity regarding their public decision-makers and to ensure that public decisions are made in the sole public interest

WHO IS CONCERNED?



18,000

public officials and civil servants,
elected and non-elected

HOW?



- **Controlling the content of declarations of assets and interests** using **extensive investigative means**

- In the cases provided for by law, **publishing these declarations**, in particular **on the website hatvp.fr**

WHAT DEADLINES?



- **Two months from the beginning or end of the functions**

- **Updates** during functions when substantial changes to assets or interests occur



WHAT TYPES OF CONTROLS?

Based on a **mandatory reporting mechanism** for individuals holding certain offices or positions:

- **Check the completeness, accuracy and sincerity of the information provided**
- **Detect situations of illicit enrichment**
- **Prevent conflicts of interest**

In 2023, the High Authority focused on the renewal of senators in series 1 and the changes in the composition of the Government and ministerial cabinets, as well as the renewal of the Assembly and Government of French Polynesia.

A total of 8,816 declarations were received, although the number was lower than in previous years due to less electoral and political news than in 2022 (marked by the presidential and legislative elections). The High Authority issued 700 reminders and 136 injunctions to public officials who had not filed their declarations. 17 cases were referred to the Public Prosecutor for non-compliance with reporting obligations.

The High Authority controlled 3,536 declarations, including 115 from members of the Government. Taking all declarations together, compliance with the requirements of completeness, accuracy and sincerity imposed by law proved to be significantly higher in 2023 than in 2022: 56.1% of declarations met these requirements from the outset (compared with 33.2% in 2022).

Only 1.4% of public officials audited received a firm reminder of their reporting obligations, while 0.1% of declarants had their declarations publicly assessed⁶ by the High Authority. No criminal offence was found in the course of checking the declarations. These results reflect a greater understanding of reporting obligations in the political and administrative culture, the compliance efforts made by public officials, and the value of the support and advice provided by the High Authority in recent years.

35.8% of public officials whose declaration of interests was checked were prescribed measures by the High Authority to prevent a risk of conflict of interests.

Lastly, the High Authority made 4,818 declarations public (of which 3,477 were published online on its website, the others being made available for consultation by voters in the prefectures). As of 31 December 2023, 12,112 declarations were available for consultation.

PREVENTION OF CRIMINAL AND ETHICAL RISKS IN THE SPORTS SECTOR

In view of the organisation of the Olympic and Paralympic Games in Paris 2024, the declarations of the 596 public officials in the sports sector falling within the scope of control of the High Authority have been the subject of particular vigilance.

At the end of 2023, 48.1% of them were up to date with their obligations. 58% of declarations of assets presented breaches requiring the filing of one or more amending declarations, and 10% presented breaches serious enough to justify the notification of a firm reminder of the reporting obligations. The control of declarations of interests of public officials in the sports sector led to the identification of a significant number of conflicts of interest situations requiring the adoption of preventive measures (in 60% of cases, i.e. a significantly higher proportion than for all declarants).

14 checks on lobbyists in the sports sector were also launched in 2023. Finally, the High Authority notes that revolving-door movements between public and private sectors are subject to variable controls depending on the status of the sports sector entities.

6. For the most serious breaches that do not constitute a criminal offence, publication of the declaration is accompanied by an assessment of its completeness, accuracy and sincerity.

Controlling revolving-door movements between the public and private sectors to prevent criminal and ethical risks

FOR WHAT PURPOSE?



- **Preventing the criminal and ethical risks** associated with revolving-door movements between the public and private sectors
- **Ensuring the impartiality and independence** of the administration's action

WHO IS CONCERNED?



15,000

public officials and civil servants performing the most exposed jobs and functions

HOW?



- **Mandatory prior referral** to the High Authority for the most exposed public functions and jobs
- A **prior referral to the hierarchical authority** then to the **Ethics officer in case of serious doubt** about the ompatibility of the project, for other public officials, the High Authority may be seized as a last resort if this doubt is not lifted

WHAT DEADLINES?



- Maximum processing time of **15 days** for pre-appointment controls
- Maximum processing time of **two months** for control of multiple jobholding plans for business creation or acquisition and for revolving-door movements to the private sector



WHAT TYPES OF CONTROLS?

- **Pre-appointment to public office control** if an activity has been exercised in the private sector during the three years preceding the appointment
- **Control of multiple jobholding plans** with part-time work **for business creation or acquisition**
- **Control of revolving-door movements to the private sector**

Despite less political and electoral activity than in 2022, the number of cases involving revolving-door movements between the public and private sectors remained high in 2023 (438 opinions issued, 69% of which concerned professional transition to the private sector).

The ministerial reshuffle in July 2023 led to a large number of referrals relating to the appointment of ministerial advisers. The High Authority also issued 30 opinions on plans for former members of the Government to move to the private sector.

Of all the opinions issued by the High Authority, 95% were compatibility opinions, more than two thirds of which were accompanied by reservations. The increase in the share of compatibility opinions with reservations, which mainly concerns pre-appointment opinions, is the result of a more detailed assessment of the risks, resulting from the experience acquired by the High Authority since 2020, as well as from the desire to preserve both the functioning of the administration and the interests of people who wish to join or leave the public service. Without hindering the professional project, the reservations make it possible to contain the criminal or ethical risks that it may present and to protect all stakeholders.

Only a very small proportion of revolving-door movements resulted in an incompatibility opinion (5%, for professional projects towards the private sector only). In each case, the aim is to protect the people concerned from

having their impartiality questioned, or even being subject to criminal prosecution. In doing so, the independence and impartiality of the administration is preserved, as well as its image and that of the companies concerned.

The quality of referral cases is improving even though some administrations are facing persistent difficulties (this is the case, for example, when the Ethics officer has not been designated). In 2023, the share of opinions of inadmissibility, incompetence or no need to adjudicate issued by the High Authority thus increased (it was 13% compared to 3.8% in 2022), while it had been decreasing regularly since 2020.

Detecting referral failures and monitoring the opinions issued by the High Authority are essential aspects of the control process, ensuring that it is fully effective. If incompatibility opinions are systematically monitored, the monitoring of the compatibility opinions with reservations could not be carried out exhaustively due to a lack of sufficient resources. However, more than 40 files were followed up and the High Authority carried out ten self-referrals. No criminal offense was noted as part of these monitoring (compared to four in 2022).

In order to strengthen the dissemination of its doctrine, to contribute to ensure the consistency of administrative ethical action and to promote good practices, the High Authority published 111 opinions on its website (compared to 38 in 2022).

Regulating lobbying to strengthen transparency in public decision making

FOR WHAT PURPOSE?



- To **strengthen transparency** in public decision-making
- To **measure the impact** of lobbying
- To establish a **common ethical framework** for lobbying activities

WHO IS CONCERNED?



Legal or natural persons carrying out an activity of lobbying towards a public official **with a view of influencing a public decision**

2,968

entities listed in the register of lobbyists **as of 31 December 2023** (+ 14.9% compared to 2022)

WHAT ARE THE OBLIGATIONS?



- To **register on a digital directory** accessible on website hatvp.fr
- To **declare the activities of lobbying and the resources** devoted to them annually

WHAT DEADLINES?



Three months from the end of the accounting period to declare lobbying activities and the resources devoted to them



WHAT TYPES OF CONTROLS?

Regular checks by the High Authority of the declarative and ethical obligations of lobbyists thanks to **documentary and on-site investigation prerogatives**

Most of the lobbyists registered in the directory had until 31 March 2023 to make their annual declaration for 2022. Only 56% complied with the deadline. After many informal reminders from the High Authority, this rate reached 90.5% in May 2023.

The year 2023 was marked by a sharp drop in the number of notifications of non-compliance (79 compared with 87 in 2022) and formal notices (five compared with 76 in 2022) for failure to file declarations, a sign both of the effectiveness of the reminders issued by the High Authority and of lobbyists' greater awareness of the system. However, six cases were referred to the Public Prosecutor.

The results of the declarations made by lobbyists in 2023 revealed a growing number of activity reports (13,579 compared with 11,105 the previous year) and an improvement in the quality of the declarations. Between the entry into force of the extension of the directory on 1st July 2022⁷, and the latest update of the directory, 431 new entities were registered (more than half of them were companies and consular chambers). Nearly 80% of them said they were active at local level. The public officials and agents concerned by the extension were mentioned 3,673 times in the activity sheets declared⁸. However, the High Authority notes that there are still difficulties in making the reform their own, particularly for lobbyists acting at local level. These developments highlight the shortcomings and legal limitations of the system for regulating lobbying already identified by the High Authority.

The year 2023 is characterised by a marked increase in the number of checks on lobbyists (234 checks initiated, compared with 163 in 2022). This increase (+43.6%) can be explained in particular by the implementation of checks on entities likely to carry out interest representation activities at local level.

153 checks were initiated on entities not registered in 2023. Of the 120 checks closed, 58.3% resulted in a registration on the directory. 79 checks on annual activity declarations were initiated in 2023 and 75 were closed (all of which resulted in changes to activity statements concerning the identity of the entity, the activity statement and/or the resources allocated to the lobbyists, giving citizens access to more accurate and useful information). Three inspections also focused on the ethical obligations to which lobbyists are subject.

Lastly, in July 2023 the High Authority published a new version of the directory guidelines, which came into force on 1st October 2024, taking into account the extension of the directory and aiming to clarify and simplify the system to facilitate its appropriation by interest representatives. The aim is also to make the register more readable and to provide a more accurate and precise picture of lobbying activity, while waiting for the structural changes pushed by the High Authority.

⁷ Inclusion of chambers of agriculture within the scope of the law and new categories of public officials likely to be targeted for lobbying, particularly at local level

⁸ Figures published by the High Authority in July 2023

Summary of proposals



Strengthen the prerogatives of control of the High Authority

Provide the High Authority with its own power to impose administrative sanctions in case of failure to comply with the obligation to file a declaration of assets or interests by a public official or of a declaration of activities and means by a lobbyist.

Allow the High Authority to exercise a direct right of communication with banking or financial institutions, insurance or reinsurance companies, government agencies, local authorities and any person in charge of a public service mission for all of its control missions.

Allow the High Authority to exercise, as part of its mission of monitoring the obligations of lobbyists, **a right of communication** with public officials targeted by a lobbying action, as well as with the administrations of the State, local authorities, companies, licensed or controlled by the State and local authorities, and institutions or organisations of any nature subject to the control of the administrative authority.

Provide the possibility, for staff of the High Authority, **of carrying out hearings** within the framework of control operations of lobbyists.

Introduce, as part of the control of the reporting and ethical obligations of lobbyists, **an offense of obstructing** the missions of staff of the High Authority.

Provide High Authority staff with **the power to copy** documents and any information support, as part of on-site inspections.



Develop the legal framework for declarations of assets and interests

Reduce the deadline for submitting declarations of interests by members of the Government to the High Authority to eight days following their appointment in order to prevent possible risks of conflicts of interest as soon as possible and to secure government action.

End the obligation of members of the Government to submit a declaration of interests at the end of their functions.

Adopt a criminal policy circular for public prosecutors on the prosecution and treatment of offenses involving breaches of probity to harmonise criminal practices throughout the territory of the French Republic.



Simplify the legal framework for management without review of financial instruments

Establish a threshold of 10,000 euros for the obligation imposed on certain public officials to entrust the management without review of their financial instruments to a third party. Below this threshold, only an obligation to declare the holding of financial instruments would be required.

Allow financial instruments to be kept as they are when they are unrelated to the sector of activity of the person concerned.

Introduce the possibility of transferring all financial instruments likely to be subject to the obligation of management without review, within a short period of time following taking office, upon authorisation and under the control of the High Authority.



Strengthen the control of revolving-door movements between the public and private sectors

Extend the scope of control of the High Authority over revolving-door movements to the private sector for certain employees of certain EPICs of the State, such as UGAP or Solidéo, of special public establishments such as the public financial institution called "Caisse des Dépôts et Consignations" as well as public establishments attached to local authorities, such as public housing offices.

Provide that the opinions of the High Authority regarding the control of revolving-door movements of public officials are systematically notified to the Ethics officer who has previously ruled on the professional transition project.

Provide that the sanctions listed in Article L. 124-20 of the General Civil Service Code, applicable in the event of failure to comply with the High Authority's opinions, **also apply in case of non-compliance with opinions from the hierarchical authority**, and specify the terms of application of said sanctions.



Modify lobbying regulation to make it more effective

ON THE SCOPE OF LOBBYING ACTIVITIES

Remove the criterion of initiative by lobbyists, and extend the obligation to declare activities to communications initiated by public officials.

Specify the scope of public decisions falling within the scope of the rules governing the lobbying regulation, according to their importance, nature or effects.

Group together in a single text the list of public officials likely to be targeted by lobbying actions.

Simplify the thresholds triggering a registration obligation, by assessing the minimum threshold of ten actions at the level of the legal entity and not per individual.

DECLARATIONS PROCEDURES

Make lobbyists subject to an obligation to file a half-yearly declaration of activities and resources.

Authorise consolidated declarations for groups of companies.

Specify in the declaration of activities the public decision targeted by the lobbyist action **as well as the specific functions** of the public official(s) with whom the lobbyist action was carried out.

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