

# OECD Anti-Corruption and Integrity Outlook: Country Fact Sheet 2024



# Poland

## Contextual factors

State structure	Executive power	Legislative system	Legal system
Unitary	Semi-presidential	Bicameral	Civil law

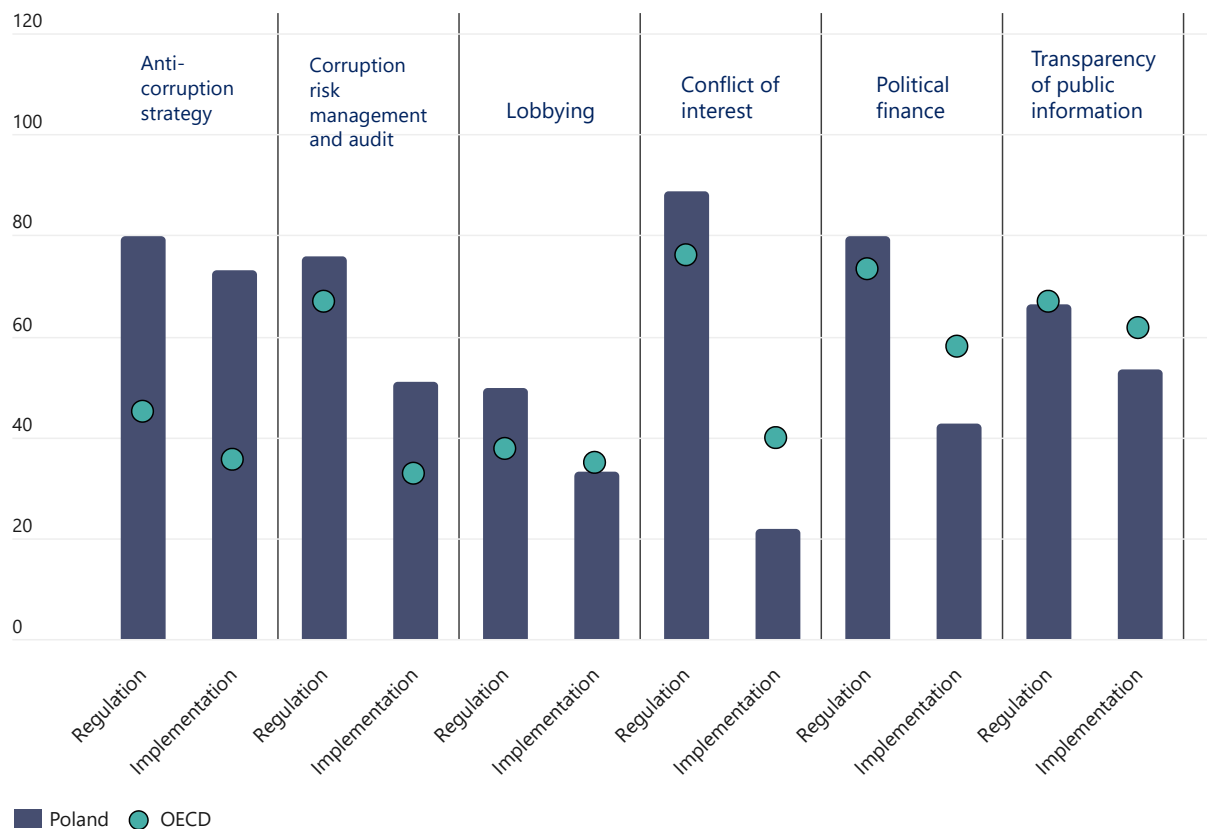
### ***Strategy and institutions on anti-corruption and public integrity***

Poland had an anti-corruption strategy adopted at the central government level – the [Government Programme for Counteracting Corruption](#) – that expired in 2020. The strategy aimed to reduce corruption crimes and raise public awareness on the importance of fighting corruption and strengthening public integrity. It defined three objectives, namely 1) strengthening preventive and educational activities, 2) improving mechanisms for monitoring corruption threats and monitoring legal regulations in the field of preventing corruption and 3) intensifying co-operation and co-ordination of activities between law enforcement agencies. As of February 2024, Poland does not have an anti-corruption strategy in place.

In terms of institutions, Poland has central government bodies on anti-corruption ([Central Anti-Corruption Bureau](#)), political finance ([National Election Commission](#)), lobbying ([Ministry of Interior and Administration](#)), a central harmonization unit for internal control and internal audit ([Ministry of Finance](#)). However, Poland does not have central body responsible for overseeing conflict of interest.

## Overview

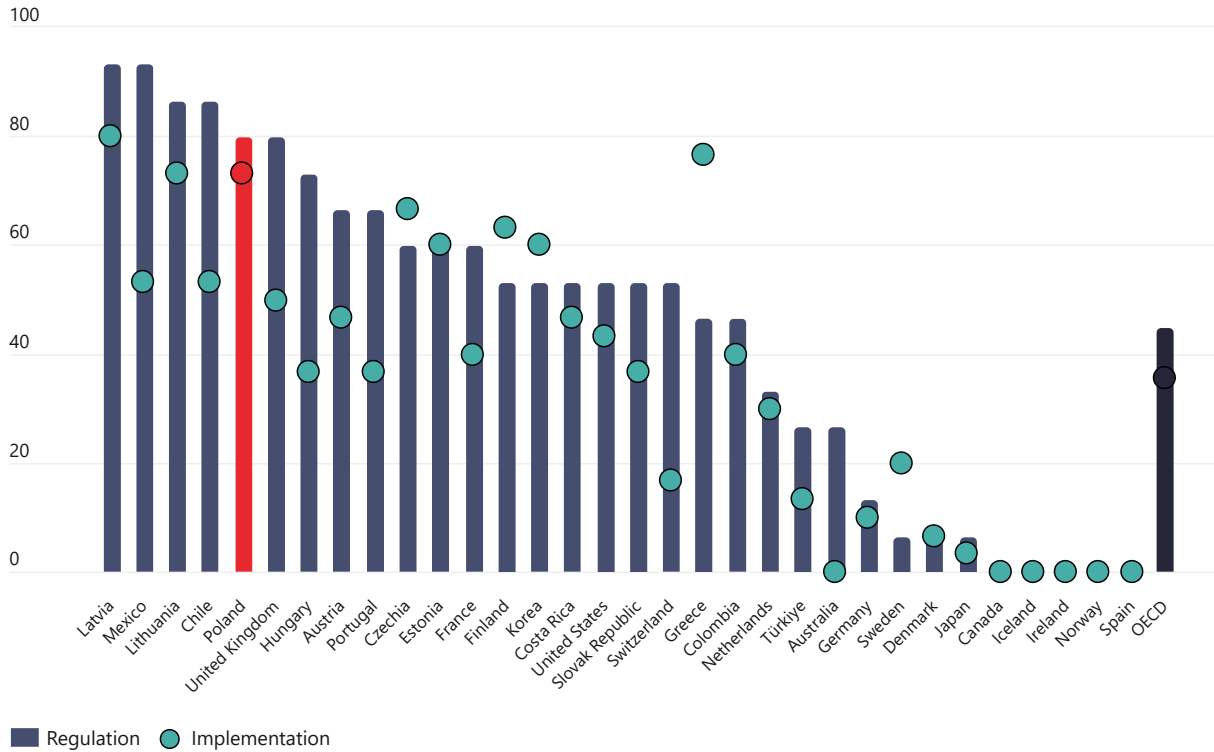
Figure 1. Overview



Greatest strengths	Areas to improve
Conflict of interest - regulation	Transparency of public information
Corruption risk management and audit - regulation	Conflict of interest - implementation
Political finance – regulation	Political finance - practice

## Anti-corruption strategy

Figure 2. Anti-corruption strategy

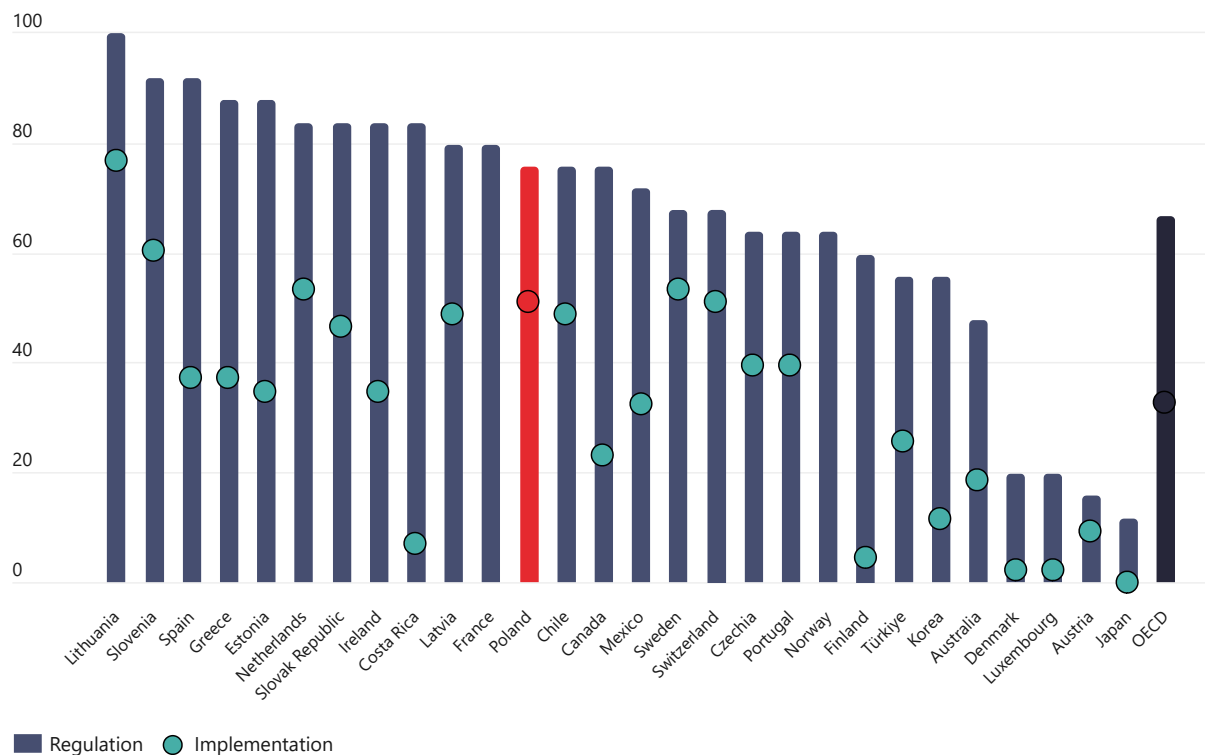


Based on data derived from an anti-corruption strategy that expired in 2020, Poland performed strongly in terms of the quality of the strategic framework.

The anti-corruption strategy that was in place during 2018-2022 – the Government Programme for Counteracting Corruption – established strategic objectives to mitigate public integrity risks in many areas, including human resource management, public financial management, public procurement, fraud, and internal control and internal audit. The strategy included all OECD public integrity standards related to content: identification of existing risks, outcome-level indicators for each objective with target values, and reference to at least one international legal instrument. The strategy also underwent inter-governmental and public consultation processes. The action plan identifies lead organisations for each objective and contains specific measures related to the evaluation of the strategy, including monitoring and reporting arrangements. However, during 2023, Poland did not have an anti-corruption strategy in place.

## Corruption risk management and audit

Figure 3. Corruption risk management and audit

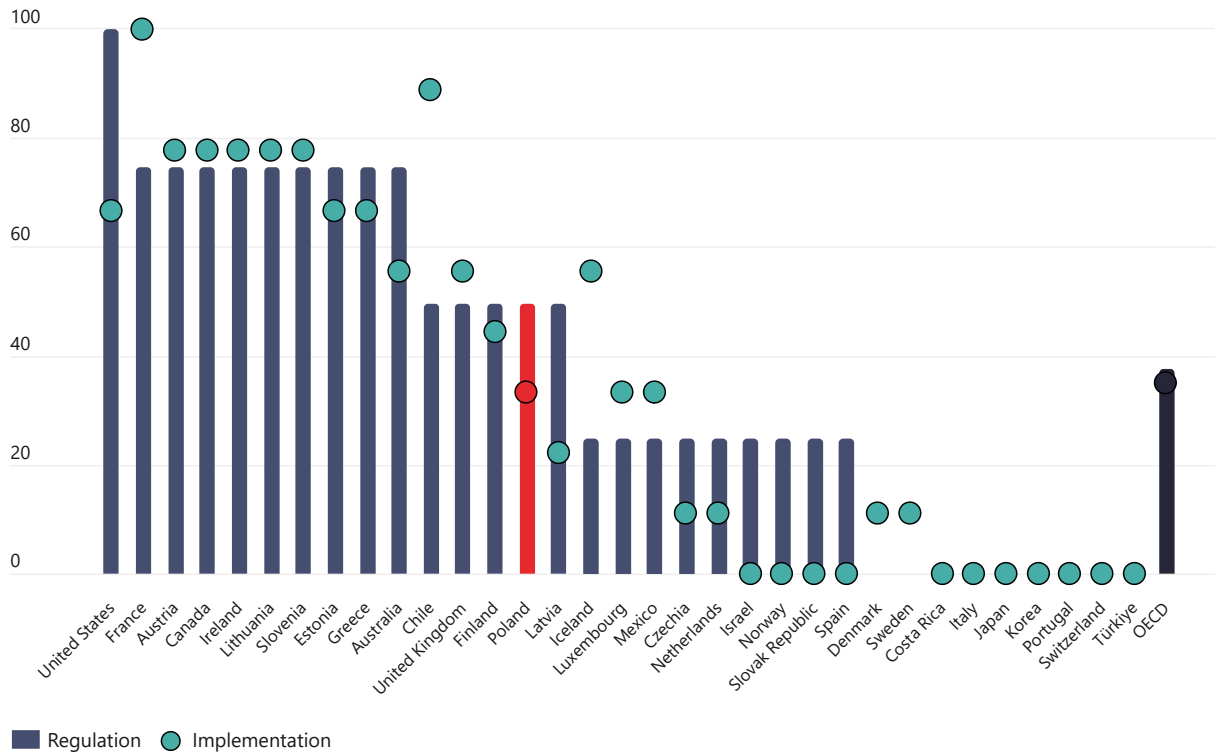


As measured against OECD standards on risk management, which includes internal control and internal audit, Poland fulfils 76% of criteria for regulations and 51% for practice, compared to the OECD average of 67% and 33%, respectively.

The regulatory framework requires a central harmonisation unit to develop the internal control and internal audit systems, defines internal control and internal audit according to international standards, assigns managerial responsibilities, specifies internal control objectives and establishes annual reporting activities, and requires internal control to be applied in all central government institutions. Guidelines on fraud and corruption prevention are part of the internal control system. Poland's risk management framework explicitly addresses public integrity risks. Although there is a strong regulatory framework on internal audit, only 19% of budget organisations are covered by internal audit and only 18% were audited internally in the past five years. Additionally, Poland is not tracking data on the implementation of internal audit recommendations.

## Lobbying

Figure 4. Lobbying

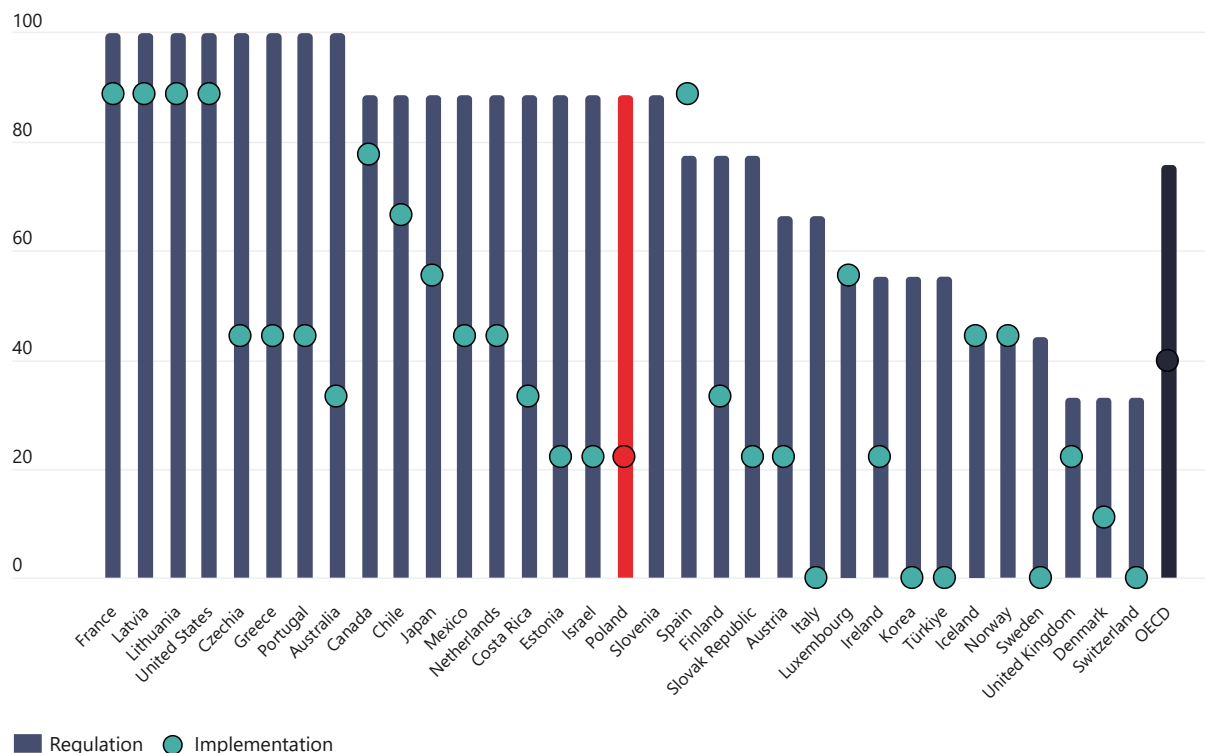


As measured against OECD standards on lobbying, Poland fulfils 50% of criteria for regulations and 33% for practice, compared to the OECD average of 38% and 35%, respectively.

The regulatory framework establishes cooling off periods for public officials but not lobbyists. While it defines lobbying activities and establishes proportional sanctions if lobbying provisions are breached it does not provide a definition of lobbyists. In practice, Poland has a supervisory function in the Ministry of Interior and Administration responsible for overseeing lobbying. A lobbying register is available online, but only includes information on the name of the lobbyist, not on the domain of intervention, type of lobbying activity, or piece of legislation targeted.

## Conflict of interest

Figure 5. Conflict of interest

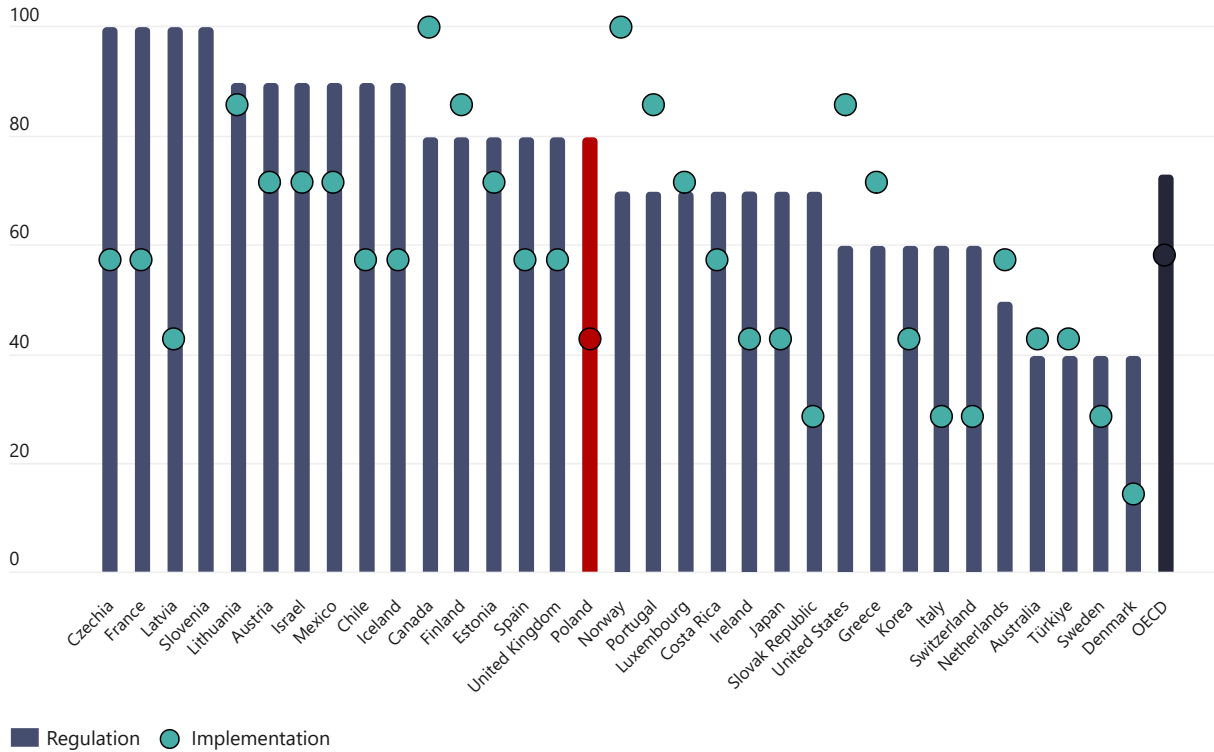


As measured against OECD standards on lobbying conflict of interest, Poland fulfils 89% of criteria for regulations and 22% for practice, compared to the OECD average of 76% and 40%, respectively.

The regulatory framework lists incompatibilities between public functions and private activities, defines circumstances and relationships that could lead to a conflict of interest, defines institutional responsibilities in terms of submission, compliance and verification, and establishes proportional sanctions if conflict-of-interest provisions are breached. Additionally, ministers, members of parliament, high-ranking judges and top-tier civil servants of the executive branch must submit an interest declaration. High-risk public officials are not required to submit an interest declaration. In practice, all ministers have declared their interests in the past years, but Poland does not track the interest declarations for members of parliament, high-ranking judges and top-tier civil servants.

## Political finance

Figure 6. Political finance



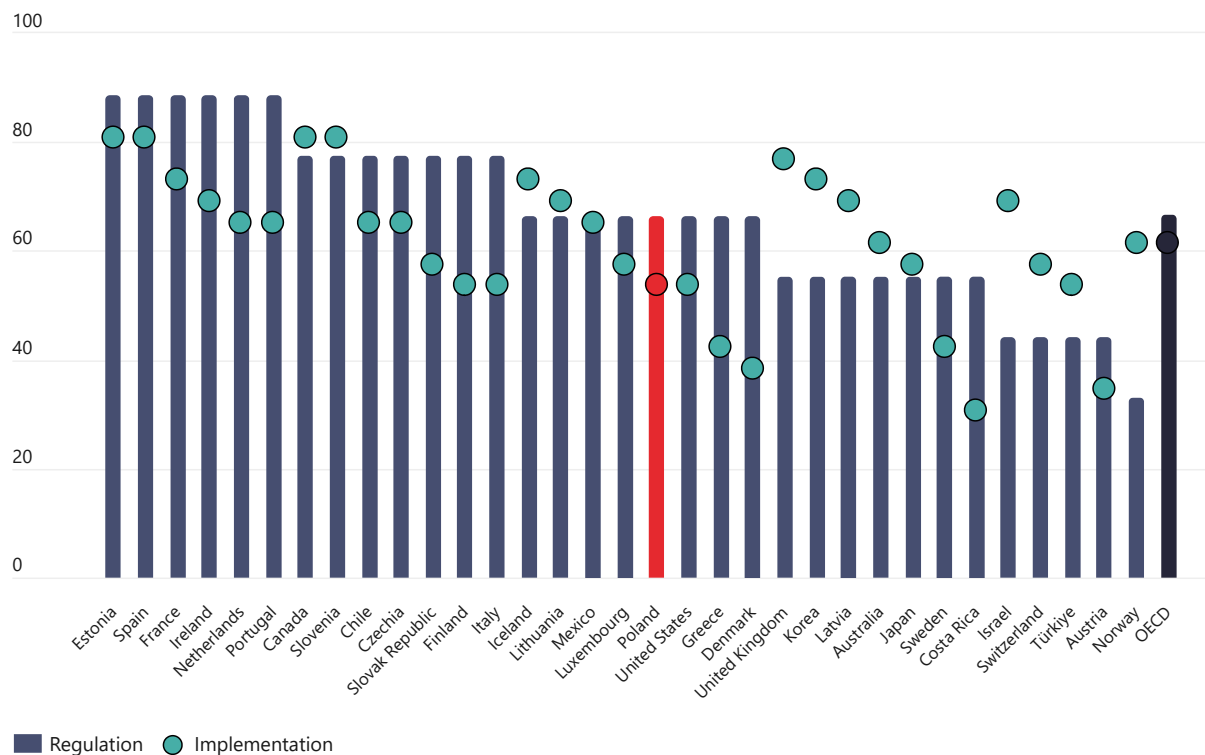
As measured against OECD standards on political finance, Poland fulfils 80% of criteria for regulations and 43% for practice, compared to the OECD average of 73% and 58%, respectively.

The regulatory framework has strong safeguards in place. For example, political parties cannot receive donations from state owned enterprises, foreign states or foreign enterprises, and they must report on their annual and campaign finances. The criteria for regulations not fulfilled are the requirement for electoral candidates to be held personally liable for breaches and be sanctioned, and a complete ban on anonymous donations. In practice, the National Election Commission is the independent body overseeing the financing of political parties and election campaigns, but it has not publicly disclosed information on the different types of sanctions issued.



## Transparency of public information

Figure 7. Transparency of public information



As measured against OECD standards on public information, which includes access to information and open data, Poland fulfils 67% of criteria for regulations and 54% for practice, compared to the OECD average of 67% and 62%, respectively.

The regulatory framework establishes that government data are “open by default”, defines deadlines to process requests and ensures the right to appeal in case of refusal. However, it does not define a mandatory list of datasets to be disclosed. In practice, although the Ministry of Computerisation holds monitoring functions for open data policy, there is no public body responsible for managing potential issues related to public information.