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JOINT PRESS SUMMARY

Anti-Corruption Framework Established in Hungary 6 Years Ago

A joint evaluation on the achievements of the past six years published by the Ministry of the Interior, the National Office for the Judiciary, the Curia, the Office of the Prosecutor General, the National Bank of Hungary, The Public Procurement Authority of Hungary and the State Audit Office of Hungary

On 18 November 2011, upon the initiative of the State Audit Office of Hungary, the Minister of Public Administration and Justice, the Prosecutor General of Hungary, the President of the Supreme Court of Hungary and the President of the State Audit Office of Hungary **signed a joint declaration**, in which they assumed moral obligation for **strengthening resilience against corruption** and for improving the anti-corruption methods applied by the public bodies they govern. The National Office for the Judiciary and the Ministry of the Interior joined the above mentioned anti-corruption framework in 2012 and 2014, respectively. In 2016, on the fifth anniversary of its establishment, the Public Procurement Authority and the National Bank of Hungary expressed their intention to join the framework by signing a memorandum of understanding.

On 11 December 2017, six years after signing the joint declaration, **Dr. Sándor Pintér, Minister of the Interior, Dr. Tünde Handó, President of the National Office for the Judiciary, Dr. Péter Polt, Prosecutor General of Hungary, László Domokos, President of the State Audit Office of Hungary, Dr. István Kónya, Deputy-chairman of the Curia, , Dr. László Windisch, the Deputy-Governor of the National Bank of Hungary, and Csaba Balázs Rigó, President of the Public Procurement Authority** held a meeting at the Academy of Justice to evaluate the anti-corruption activities of the public institutions governed by them, and communicated the results achieved to the public.



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Since 2014, the **Ministry of the Interior** is responsible for coordinating governmental anti-corruption tasks with the help of the **National Protective Service**. In recent years, the independent and joint work of public bodies in this field is coordinated by the **National Anti-Corruption Program**. Action plans for a two year period ensure the implementation of the Program. As a result of the implementation of the first action plan, the primary complex corruption risk assessment of administrative posts was completed within the entire public administration. With the help of data and trends measures that can be formulated in a job-specific way based on the level of risk in order to reduce them.

The Program defines the development of official procedures as an intervention field and increases the transparency of state administration processes. Electronic administration and communication become more and more decisive in all areas of life, and now it's an inevitable

part of everyday life. In addition to traditional tools IT developments are also used to reduce corruption risks, which are operating automatically in integrated systems, help to simplify and monitor on a documented way. Systems introduced in the field of traffic offenses are able to perform detection of the infringement, identification of the perpetrator, decision making and sanction without human involvement.

The increase in the number of cases that can be handled from home or mobile phones can lead to an effective reduction of the corruption risks inherent in the personal relationship between the client and the administrator, which also enhance the convenience of citizens. Electronic tracking of cases also provides customers transparency on their procedures. Binding IT processes that are established in accordance with the law do not allow the unjustified influencing of the procedures and reduce the possibility of human error of the authority. The official relationship between public and institutional actors is becoming more transparent. Compared to traditional communication tools, tracking and documentation of processes will be simpler and faster. This increases the responsibility of managers, which strengthens the integrity of organizations and improves operational efficiency.

Recently, the Ministry of the Interior and its institutional partners have implemented the development of **integrated electronic systems** that consciously enforce the aforementioned spirit and purpose in all areas of e-administration. Controlled and regulated systems reduce human intervention to a minimum, thus reducing the risks considerably, ensuring lawful administration free from influence. Electronic administration is increasingly widespread in official and other public administration procedures. The breakthrough in this regard was the introduction of a new identity card (e-ID), enabling a wider range of e-government and e-administration. This way of authentic e-identity process has opened up the way for virtually unlimited expansion of IT applications, which are already available from mobile phones. The creation of an electronic auction and sales interface and the development of an electronic procurement procedure can also be considered a significant achievement.

A further milestone of this process is that from 1 January 2018 the client, the local government, the budget organization, the public prosecutor, the notary, the public body, other administrative authorities, the legal representative of the client and the economic organizations acting as a client are obliged to deal cases electronically as defined by law.



The **Curia** of Hungary has made significant steps in 2017, too, in developing integrity and eliminating the risks of corruption. On 11 November 2017 the supreme judicial forum participated, together with several other state agencies, in the annual conference which evaluated the implementation of the commitments that had been undertaken in the Statement of Cooperation in Strengthening Ability to Resist Corruption, signed in November 2011.

In 2017 several regulations and rules of procedure have been renewed, and several new Presidential instructions have been issued with a view to strengthening the ability to resist conducts giving rise to material or moral harm endangering the Curia's operation and the performance of its statutory tasks. These measures have covered the entire scope of the Curia's professional and administrative activities. It is of utmost importance that the **rules of procedure applicable to integrated risk management and the handling of events**

violating integrity have been renewed. The regulation which entered into force on 1 January 2017 aimed to ensure that within each organisational unit risks be managed according to a uniformed procedure, in conformity with the provisions of the relevant Government Decree, by having regard to the aims specified in the Curia's Strategy. In this way the occurrence of events violating the Curia's integrity may be prevented more efficiently and in case such an event occurs, it is detected and liability for it is established under uniformed rules.

The renewed regulation specifies all activities or omissions that violate or endanger the Curia's operational order, budget, asset management and activities related to the performance of its primary tasks as events violating the Curia's organisational integrity. It is important to note that under the regulation persons reporting such events are granted protection.

For years, **a risk management working group** has been in operation at the Curia, which **holds a meeting half-yearly**, where risks having appeared in the Curia's operation are mapped and identified with a view to working out efficient solutions.

Moreover, the Curia's personnel regularly participate in integration promoting theoretical and practical trainings.

In 2017 **the Curia has systematised its strategic goals**, reviewed its main processes and sub-processes, prepared its process map, and compiled a risks inventory.

In 2017 year the Curia has taken further measures to **develop the security of its information technology system**. The Curia applies the virus protection system of the National Office for the Judiciary. In case of a virus attack, external expert assistance is immediately provided and the remote administration of virus protection of IT equipment provided for home use has also become possible. The Curia has installed new IT equipment for the centralised installation, management and administration of the monthly security updates of the work stations and servers.

As a result of these measures, this year altogether two events affecting the Curia's integrity have occurred. These events were identified in due time by the organisation and the necessary steps were taken by the decision-makers.

Extensive and high-level integrity cannot be attained without cooperation, therefore in 2017 **the Curia has**, for the sixth time, **participated in the Court of Auditors' anti-corruption survey**.



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The establishment of an organisational and operative system securing integrity is considered by **courts** as top priority. One of the **strategic goals** of the court announced in 2012 was the integrity of the court organisation, the transparency of rendering judgements and administrative work, the predictability and level of control of the latter. Last year, the National Office for the Judicial (NOJ), court leaders and employees also worked hard to achieve this.

The **Court Integrity Work Team**, the members of which are leaders, judges, experts with huge theoretical and practical experience working at different courts, in various sections, has been active within NOJ since 2012. They discuss the most important professional issues affecting integrity and develop the recommendations for measures to be taken in connection with these. In the interest of screening information technology risks, this year the **Information Technology Security Management System Work Team** was also formed.

The courts continue to annually participate in **the integrity survey of the Hungarian State Audit Office**, which aims to explore the risks threatening the integrity of public sector institutions. This year NOJ and 21 courts (the Curia, 2 regional courts of appeal and 18 courts of justice) filled in the survey form. It is an outstanding result that, according to the evaluation of last year's survey, the figures indicating the integrity of judicial institutions – among them the court organisation – are excellent. The mechanisms, strengthening defence against corruption, work appropriately within the judicial institutions. Among others, the Code of Ethics of judges, the central and local regulations, as well as the regular training of colleagues may also form a part of this.

As far as the integrity-related trainings are concerned, this year we organised two inside **trainings** for newly hired colleagues. With the help of NOJ and guest lecturers – including the colleagues of the Constitution Protection Office – among others, we also called attention to the risks of information technology and contact security issues during the trainings. Once a year, we hold a central training for the colleagues in charge of the courts' integrity, following which the 25 individuals in charge of integrity hold trainings within their own court, for those employed there. This year, the integrity training of 5,311 court employees was executed. Thanks particularly to these trainings, the court employees are increasingly conscious in integrity issues.

In its decision passed in November of this year, **the Constitutional Court confirmed that it is possible, moreover, it is necessary that integrity issues are regulated within the court organisation.** According to the decision, "Conformity with the values defined in Section 1 [of the Integrity Regulation] (transparency, responsibility, accountability, professionalism, impartiality, fair procedure) is a priority social requirement against and a basic required conduct from every judge and judicial employee. The fact, that abiding by the clearly described value system is an obligation for those belonging under the personal scope of the Regulation, by itself does not result in influencing the decision-making activity of judges, or its direct possibility." In its 2017 draft report, the Group of States against Corruption (GRECO) of the Council of Europe expressly greeted the creation of the Integrity Regulation. NOJ continuously monitors the enforcement of all the regulations, and collects valuable practical experience. Suggestions for the amendment of other provisions of the Integrity Regulation have already been received from the judiciary. Thus the review of the Regulation is underway, and the amendment will also take into consideration the content of the justification of the Constitutional Court decision.



As a result of its external and internal cooperation **the Prosecution Service of Hungary** has shown considerable achievements both in the fight against corruption crimes and with regard to its organizational integrity in the recent years.

The Office of the Prosecutor General has maintained an excellent and continued working relationship with **OLAF**, which was also confirmed by Mr. Giovanni Kessler, Director-General of the OLAF at his meeting with Mr. Dr. Péter Polt, Prosecutor General on 7th February 2017. The Prosecution Service of Hungary ordered criminal investigations to be opened as a follow-up to all OLAF recommendations and signals, and where criminal investigations were already ongoing OLAF recommendations were made part of and assessed in connection with the investigations files. If the suspicion of bribery arises in addition to the suspicion of budget crime in a case opened as a follow-up to an OLAF recommendation, the criminal investigation generally covers the circumstances of this other offence as well. This occurred in the Metro 4 project case. As a result of the criminal investigations opened as a follow-up to 33 recommendations, 4 signals and 1 final report of OLAF the Prosecution Service of Hungary filed indictments in 9 cases, and out of these cases there are 2 where the judgement of the court convicted the offenders. There are 7 other cases where the court has not rendered a judgement yet, and there are 8 cases which were closed by the termination of criminal proceedings. In all the other cases the criminal investigation is still ongoing. The efficiency rate of criminal proceedings opened as a follow-up to OLAF recommendations, signals and final reports – i.e. the rate of indictments and terminated cases – is higher than the average rate of the EU.

Apart from this, the Prosecution Service of Hungary is specifically active in contributing to the work of **EUROJUST** and of the international joint investigation teams coordinated and financed by the latter. These international joint investigation teams have proven to be more effective tools than any other ones against perpetrators of cross-border, organized crimes as Ms. Michèle Coninx, President of the Eurojust also explained at her meeting with Mr. Dr. Péter Polt, Prosecutor General on July 14th 2017.

The efficiency of the Prosecution Service of Hungary is well demonstrated by the rate of measures taken against corruption crimes. Comparing the statistics of the last 10 years it can be concluded that while in 2007 criminal complaints were dismissed with regard to 11.9% and criminal investigations were terminated with respect to 38.8% of the corruption crimes respectively, these rates fell back to 7.6% and 25.7% in 2016. Compared to the total number of crimes the rate of indicted corruption crimes is significantly higher. Taking the average of the last ten years 58.1% of the total number of the corruption crimes ended with indictments (with regard to the total number of indictments this rate showed the following: in 2015: 52%; in 2016: 55%).

By using its experience in the fight against corruption crimes the Office of the Prosecutor General elaborated on its argument and reasons during the codification process of the **new Criminal Procedure Code of Hungary**. The Prosecution Service of Hungary agreed with the view that the newly adopted provisions of law narrow the scope of immunity. It is an important achievement and novelty that due to the contribution of the Prosecution Service the new Criminal Procedure Code includes rules concerning special investigation techniques. The application of various undercover tools provides indispensable preconditions for the detection and proving of corruptive acts.

Integrity screenings can be conducted by the **National Protective Service** only upon prosecutorial approval, and after the integrity screenings are finished prosecutors review whether they have been carried out lawfully. This legality review task is included in the non-criminal activities of the Prosecution Service. The number of criminal complaints filed as a result of these integrity screenings was the same (26) last year as in the year before.

Personal and organizational securities provide fundamental conditions for creating integrity. The issue was raised with special emphasis in view of the rifled attack having occurred in the building of the Local Court and Prosecution Office in Kiskunhalas in March 2016. New security risks called for stepping up actions of defence, and for this reason the Office of the Prosecutor General has set up a national prosecutorial phone alarm system in cooperation with the Ministry of Interior.

Besides this, organizational integrity is equally strengthened by the analysis of corruption risks, the continuous and comprehensive training, **the Code of Ethics** and **Standards of Prosecutors' Professional Conduct** adopted in December 2014 as well as by the regular reports on measures taken in corruption cases. Such reports are generally made on the website of the Prosecution Service as well as via the media.



The State Audit Office of Hungary (SAO) committed itself to the establishment and implementation of an integrity-based public administration culture, and **has paid special attention to the fight against corruption based on prevention for more than 10 years.** In 2007 and 2009, the National Assembly adopted resolutions to mandate the State Audit Office of Hungary to strengthen its role in fight against corruption, and furthermore, in its Resolution approving the 2014 Annual Activity Report of the SAO, it recognised and confirmed the activities of the organisation related to the assessment of corruption risks and to the widespread implementation of integrity-based organisational culture. Furthermore, **since 2015 the SAO has built in its audits the evaluation related to the status of development and implementation of integrity controls.** In 2017, **the SAO carried out audits of systems ensuring integrity in case of hundreds of audited organisations,** and thus contributed to the improvement of systems ensuring protection against corruption at these audited organisations.

❖ **Integrity Project of the SAO – the “Hungarian model”**

The State Audit Office of Hungary created an outstanding “Hungarian model” through the **Integrity Project** developed in cooperation with the Netherlands Court of Audit and launched in 2009, making the model suitable for comprehensive application throughout the entire Hungarian public finance sector.

In 2017, the SAO conducted its **seventh Integrity Survey** on the corruption risks of the Hungarian public sector, as well as on the status of controls developed to mitigate such risks. Within the framework of the research activity carried out on a regular basis since 2011, a total of **3346 organisations provided data** which number is more than three times higher than the number registered at the launch of the programme seven years ago. Accordingly, the survey covered the evaluation of the integrity status of **public services, public authorities, public**

procurements, employment of experts, as well as business relations established between **public and private actors**.

The results of **the research carried out by the SAO in 2017** proved that the **participation in the survey in itself strengthens integrity awareness**. Parallel to the permanent decrease of integrity risks of national public institutions considered as a trend, the changes of indices indicate that the average level of developed controls has not decreased, therefore the ratio of risks not covered by controls has remitted which means that **the level of integrity has improved on system level in the Hungarian public sector**.

In the past years, the State Audit Office of Hungary has gradually extended its **Integrity Survey** focusing on mapping corruption risks and the level of protection **to business associations in majority state ownership**, and later **to business associations in majority local government ownership**. **The SAO published** the latter study – related to the **survey on associations of local governments – in January 2017**. The analysis also **defined guidelines in order to improve the integrity status of associations of local governments and previously state-owned associations**. In close relationship with this, **in 2017 a cooperation has started between the State Audit Office of Hungary and the Hungarian National Asset Management Inc.** in order to develop the integrity of state-owned companies. In October 2017, the SAO has launched a subsequent, but joint survey related to business associations in majority state ownership, as well as to business associations in majority local government ownership.

❖ **Advisory activity of the SAO –ethical leadership training and self-testing**

The improvement of integrity approach in the public sector and national cooperation on anti-corruption is demonstrated by the fact that knowledge and experiences related to integrity management systems have built in and are building in **trainings of experts and managers in the public sector**. The SAO in cooperation with the Ministry of Public Administration and Justice and the National University of Public Service launched a **training of integrity advisers** in 2013. In the past years there were 200 experts attaining diploma. Advisers support the development of public administration through the decrease of risks of corruption and abuse.

By recognising the achievements of the SAO, in its Resolution No. 34/2015. (VII.7.) the National Assembly supported that in respect of organisations involved in managing public funds and public property, the SAO should widen its advisory activities regarding management systems and should support **ethical leadership training in public finance**.

It was for such considerations that the SAO renewed its co-operation agreement with the University of Miskolc of which main aims are to lay down the professional foundations of ethical leadership training in public finance and to develop training programmes for top leaders of budgetary institutions. Based on its audit experiences, the possibility of participation in such training programme was created for the first time to directors-general and directors of museums by the SAO. **In 2018, the State Audit Office of Hungary will expand its leadership training programme based on its audit experiences – putting integrity in focus –to further institutional groups and areas of public finance**.

During 2017, the SAO maintained its close relationship with institutions participating in the cooperation in the fight against corruption initiated by the SAO in 2011. **Under the umbrella of knowledge-sharing**, SAO leaders and experts took part in professional-training events and conferences of the National Protective Service of the Ministry of the Interior, the National Office for the Judiciary, as well as the Public Procurement Authority of Hungary as lecturers and trainers.

Being the “driving force” of the change of integrity approach, since 2014 **the SAO** have been promoting public institutions to implement the approach with the application of **self-tests** as a new tool. The self-test system – that is available on the SAO’s website (www.asz.hu) and of which application is voluntary – can contribute to the improvement of the internal control system and self-testing ability of participating organisations, and thus facilitate to establish the foundations of organisational integrity. **Organisations of the public sector downloaded self-tests of the SAO in a total of almost 2000 times in 2017.**

❖ **International Commitment of the SAO – knowledge-sharing**

Within the international community of Supreme Audit Institutions, the State Audit Office of Hungary is an active player in the field of integrity and the fight against corruption as well. By its Resolution 41/2013. (V.27.), the National Assembly supported the State Audit Office of Hungary in participating in **the INTOSAI Development Initiative (IDI) activities** of the International Organisations of Supreme Audit Institutions (INTOSAI) and in providing support as donor for this initiative. At the end of 2015, the SAO offered its 2014 budget residue of HUF 129 million HUF to **support the anti-corruption programmes of IDI, as a result of which Hungary has become a significant funder of the initiative.** Public administration development programmes executed in 75 developing countries world-wide – typically in Africa, Asia and Pan-America – have been under way in 2017 with the professional participation of the SAO and will continue in 2018 as well.

Within the framework of the **series of “good practices” seminars** which promotes international knowledge-sharing, in spring 2017 the SAO again organised a four-day Integrity Seminar – considered now as a tradition – and it plans to organise this even next year as well. During the events organised so far, the SAO shared **its experiences in the field of fight against corruption with a total of experts of 128 Supreme Audit Institutions of 47 countries.**

From the point of view of utilization at international level, an important event of this year was the **International Integrity Workshop** organised by the SAO in Budapest on 24-28 April 2017. The aim of the professional workshop organised with the participation of six countries – Albania, Georgia, Kosovo, Macedonia, Moldova and Ukraine – was to help partner Supreme Audit Institutions to learn about the method applied in course of the integrity survey of the SAO and by the application and adaptation of the method they **spread the integrity culture** in their own countries. In the second half of 2017, this work has commenced in several countries, additionally in order to implement these goals the SAO concluded a bilateral cooperation agreement with the Supreme Audit Institution of Iraq. In relation to this, in autumn 2017 **the SAO set up an individual project group within the framework of the European Organisation of Supreme Audit Institutions (EUROSAI) to promote the spreading of integrity culture and mutual knowledge-sharing.** There are seven EUROSAI member countries – Albania, Austria, Bulgaria, Georgia, Macedonia, Romania and Ukraine – joined the project.

The State Audit Office of Hungary shares the methodology, measurement and results of preventing corruption at various professional, scientific and educational forums. Our goal is to offer our research and audit methods, based on stringent international standards, and the results thereof as points of reference, so that they can contribute to the **widespread domestic and international dissemination of integrity culture.**



More than a year ago, in November 2016, the **Magyar Nemzeti Bank (MNB)** was pleased to join domestic government institutions' call to fight against corruption. Also as a part of this joint endeavour, the MNB treats it as a priority issue to strengthen resilience to such abuse.

Joining was also important for the MNB, given the opportunity for the different institutions to learn from each other in order to continuously **develop their own sets of instruments**. It is not coincidence that the fight against corruption was given strong emphasis in the lectures read at this year's annual assembly of the Non-profit Association of Hungarian Financial and Economic Inspectors grouping together much of those institutions. Integrity means not only commitment and coherent approach, but also understanding and learning the related specific techniques and methodologies. Thus, fellow organisations can quickly adopt the efficient solutions developed by one institution.

Over the past year, the MNB has done much to strengthen transparency. This year, the MNB restructured the organisation of its supervisory area by **splitting up its inspecting and legal organisational units**. This means that during the oversight of a specific institution, the 'four eyes' principle is used in each workflow and at each decision point, from the very first moment of the inspection to the issue of the central bank resolution, and colleagues participating in the project work under the control of managers completely independent from each other.

The MNB expects the financial institutions it oversees to follow the same approach in respect of integrity. For lack of integrity would also pose financial stability risk in this sector, and therefore even the possibility must be nipped in the bud. For this reason, the MNB uses all methods, specifically by issuing its recommendation in June last year on the establishment and operation of the internal lines of defence, and on the governance and control functions in financial institutions as well as adopting the European Banking Authority's guidelines on sound remuneration policies, to ensure that financial institutions develop adequate instruments to fight against corruption.

In respect of ensuring the integrity of market participants, digitisation and the emergence of fintech companies pose a new challenge. For digital business processes, requiring no writing, are sometimes quite difficult to follow and are hard to enforce. More recently, the MNB, by issuing its pioneering recommendation on the use of cloud services by financial institutions, has been making vigorous organisational and regulatory preparations to face the related supervisory challenge. As a result, the MNB will fully **guarantee financial stability in the new digital world**.



Five years after the signature of the joint declaration aimed at the cooperation to fight corruption, which was the initiative of the State Audit Office; on 17 November 2016 the Public Procurement Authority of Hungary expressed its consent to fulfil the obligations undertaken in the above declaration.

Since then the Authority has paid special attention to strengthen the immunity of the organisation to corruption, in this regard **the security of the entire IT system has been reviewed**. The Authority applies new information security technologies; thus, a more effective firewall and a new log analysis system has been installed. Moreover, our INSIDE purchase support system has also been reviewed and updated, consequently the transparency and the traceability of the purchase process has been increased.

Although the Authority does not fall under the scope of the Government Decree No. 50/2013 on the integrity management system of administrative bodies and on the order of meeting advocacy groups; still, the Authority concentrates on the enhancement of integrity and on the awareness-raising of anti-corruption behaviour among its colleagues. Considering the above, our colleague participates on the integrity advisor postgraduate specialist training course of the National University of Public. We plan to organise trainings for our colleagues and to revise the code of conduct in force.

In order to curb and prevent public procurement corruption, in 2012 the Council operating within the framework of the Public Procurement Authority of Hungary established a **Public Procurement Code of Ethics**, which entered into force on 1 March 2013. The aim of the Code is to provide guidance to the participants of public procurement procedures – both contracting authorities and economic operators – as to how behave ethically during public procurement procedures, thus also contributing to the effective spending of public money, to the protection of public assets and to the transparency of public procurement procedures. The Council revises the provisions of the code at least twice a year and updates its content, should it deem necessary.

In order to ensure the transparency of purchases and fair competition, furthermore to promote the planning and control of purchases, the Authority intends to accept its revised **purchase regulation**, in which detailed rules are aimed at ensuring the independency of contractors from each other.

In order to facilitate the application of public procurement law and to spread good practices, as part of the V4 presidency programme of Hungary and under the auspices of the Mr László Domokos, president of the State Audit Office, on 14 November 2017 the Authority organised an **international conference** titled „Clear, accessible and competitive procurement”, which event attracted nearly 360 participants and paid special attention to introduce the international practice of fighting corruption. As part of our voluntary training activity and upon the request of the National Protective Service, during the anticorruption training organised for the colleagues of the Service, the Authority made a series of presentations on the public procurement related corruption risks and experience.

The aim of the contract control activity of the Authority, which is unique in Europe, is to ensure the monitoring of the performance of contracts concluded as a result of public procurement procedures, respectively to ensure the monitoring of conforming performance. As a result of the contract control activity, the Public Procurement Arbitration Board imposed fines amounting to HUF **117 330 000** in 2016 and amounting to **HUF 342 720 000** until 30 November 2017.

In compliance with its competence defined by the law, the main goal of the Authority is to restrain the number of not open procedures, that is to **curb the number of negotiated procedures without prior publication**. Due to our close monitoring activity, the **proportion of not open procedures has dropped by nearly 40%** compared to last year.

During the last year, a considerable change has taken place in the practice of the Public Procurement Arbitration Board, which operates within the framework of the Authority, but is professionally independent: the Arbitration Board pays special attention to impose high fines in cases of serious infringement, while provides assistance in other cases. The fines imposed by the Public Procurement Arbitration Board in 2017 amount to **HUF 628 885 000**.