

Anti-corruption Measures in the New Croatian Public Administration Office Management Regulation

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Abstract – The beginning of 2023 marked the start of the application of the new Office Management Regulation in the Republic of Croatia. The Office Management Regulation updates the rules and measures of office management in the performance of state administration, other state bodies, local and regional self-government units and legal entities with public authority with the requirements of digitalization and electronic communications. The new legal regulation introduces digital first, electronic office operations, also including provisions on certain anti-corruption measures. These measures are intended to prevent abuses in the office management system of the public administration system. This paper describes how the introduction of modern electronic business can simultaneously introduce anti-corruption measures and increase the legality and transparency of the work of the state and public administration. The model introduced by Croatia can certainly be an interesting example for other countries in the process of office business reform. The paper also explores the potential application of industry self-regulation anti-bribery standards.

Keywords: *office management; public administration; paperless work process; anti-corruption; anti-bribery;*

I. INTRODUCTION

On July 1st 2021, the Government of the Republic of Croatia adopted a new Regulation on Office Management (Croatian: *Uredba o uredskom poslovanju*), a basic document regulating the management of state and public administration in the Republic of Croatia (further: Regulation). [1] The provisions of this Regulation are aimed at the functioning of public sector and related bodies, and shall apply to the office management of state administration bodies, other state bodies, local and regional self-government units and legal persons with public authority. Along with the Regulation, an Instruction was adopted on the numerical markings of letters and the content of office business records (hereinafter: Instruction). [2]

According to the Croatian Public Administration System Act (Croatian: *Zakon o sustavu državne uprave*), the tasks of the state administration are the implementation of state policy, direct implementation of the law, inspection

supervision, administrative supervision and other administrative and professional tasks. Also, the affairs of state administration include any work entrusted to a certain legal entity by the law governing a particular administrative area and determined as work performed as a public authority. [3]

Article 3. of the Regulation explicitly provides: “Public law bodies conduct official correspondence with each other and with natural and legal persons primarily electronically.”

This is undoubtedly the most crucial change in a seemingly mundane legal requirements pertaining to public sector office management legal framework in Croatia, prioritizing electronic communication and data interchange between public sector bodies as well as with citizens and commercial entities and continuing on a path of development of internet based services that in the earnest started with the e-Gradani (e-Citizen) project in 2014.[4] The Regulation provides for full application of this provision from January 1, 2023. At the moment of preparing this paper, while there is no current research into the status of the application of the Regulation, anecdotally the public sector bodies are struggling with implementation of requirements, ranging from planning and acquiring adequate IT systems and support to process planning and staff training.

The Regulation includes a few interesting and novel anti-corruption measures. The legislator, i.e. the proponents of the Regulation, long concluded that non-transparent operations, abuses and even corruption and other punishable procedures in the public sector start precisely from the system of office operations, as its archaic paper based processes, combined with other factors influencing the behaviour and performance of public sector employees foster an environment prone to misuse. As documentation in the system of state and public administration is managed through the system of office operations, clear, precise and transparent office operations would present an efficient barrier to irregularities.

In the legislative system of the Republic of Croatia, secondary, subordinate legislative acts (bylaws) are usually not adopted with extensive explanations of the acts themselves, as in the case of primary legislation such as

laws. Therefore, the reasons for the adoption of proposed provisions as were adopted have not been officially explained by the legislators, nor were subjected to public scrutiny through a formal public consultations.

However, the intention and the desire to introduce effective anti-corruption measures can be read from the new procedures. We consider these measures important, both for Croatia as well as for other countries in the broader Western Balkans region with the same or similar public administration tradition and background, undergoing the various transitions converging on the process of EU Member State candidacy. The transition in digitalization of public administration processes is an important step in this regard, and it is likewise important to detect and explain these measures and their application and purpose.

II. PUBLIC ADMINISTRATION OFFICE MANAGEMENT PRINCIPLES AND STANDARDS

In general, public administration office management operations are based on broad principles that should help guide the development of such systems, their behaviour and efficacy. These principles include:

- Principle of lawfulness and accuracy
- Principle of expediency
- Principle of simplicity, uniformity and transparency
- Principle of frugality
- Principle of civility

The principle of lawfulness and accuracy requires that office work and acts be based on real facts and other data and circumstances determined clearly, precisely, impartially and in a lawful manner. Principle of expediency mandates that office work be performed as quickly as possible within prescribed deadlines. Of course, efficiency must not come at the expense of legality and accuracy. The principle of simplicity, transparency and uniformity is understood to require that civil servants, during office work, should avoid any action, procedure or communication that could lead to unnecessary complications in official proceedings, redundant files and records. The principle of frugality means that in office operations, the greatest efficiency should be achieved with the least amount of money and material resources, energy and time of employees and clients being spent. Finally, the civil servants need to perform their function in a civil and respectful way, in handling documents and communicating with citizens and parties, as well as among themselves, avoiding quarrelsome and conflicting behaviour, in a calm and polite manner. [5]

In addition to the principles, general documentation management standards are also applied to office operations, for example standards such as HRN ISO 15489-1: 2016 Information and documentation - Records management - Part 1: Concepts and principles (ISO 15489-1:2016). [6] The mark HRN ISO means accepting a foreign standard in the original. This part of ISO 15489 establishes the core concepts and principles for the creation, capture and management of records. [7]

III. TOWARDS FULLY DIGITAL PUBLIC ADMINISTRATION

Article 3 of the Regulation states: "*Public bodies conduct official correspondence with each other and with natural and legal persons primarily electronically.*" This provision means that electronic communication with clients is the rule, and falling back to paper based (including file folders and classic paper based documentation handling) correspondence becomes (an increasingly rare) exception. At the same time, even when dealing with paper-based communication, the data on the physically opened (paper based) case file is also kept in the electronic system, which as we will state in more detail later in the paper, can represent an anti-corruption measure in itself.

In Croatian administrative practice, there have been cases (some were the subject of criminal proceedings) of unlawful and/or fraudulent document changes in existing public administration files. The obligation to keep records of the file in electronic form (even when the file itself is physical) cannot prevent the replacement of an existing document in the file with another one, but it does prevent the prohibited retroactive insertion of documents (eg forgotten consents to a decision already made). Therefore, we consider the obligation to keep electronic records and the movement of documentation through the system, even when the actual case file is on paper, a practical anti-corruption measure.

Another important anti-corruption measure introduced by the new Regulation is the introduction of a new "unique identifier". The regulation states in its glossary: "*a unique identifier is a written identifier that enables verification of originality, completeness and traceability when exchanging data between office business information systems, and is created within the office business information system by machine, by random selection*".

As this is a completely new concept in Croatian office management legislation, it is additionally explained in a separate document: "*The unique identifier is used for the exchange of data between information systems.*" It is assigned to every communication (automatically within the information system of office operations), which is created and received in the body, but is not expressed in the communication itself. The unique identifier of a communication is conceived as a UID ("unique identifier") which is guaranteed to be unique among all identifiers used for a certain type of object and for a specific purpose. GUID or HASH are usually used in systems today. [8]

At this point, those familiar with current technological trends, may react at the very term and description of a unique identifier as a possibility of introducing blockchain technology into the work of state and public administration.

To be fair, blockchain based technology as a foundation for a system of office management in public administration is not referenced in the Regulation itself. However, interestingly, it is mentioned in the National Plan for the Development of Public Administration until 2027: "*At the global level, blockchain technology has been in the center*

of attention for some time, due to the advantages it can offer to public administration, for example in simplifying administrative procedures or managing public registers. Also, artificial intelligence has significant potential for application in public administration." [9] We believe that blockchain would represent another revolutionary change, but for that, as a further step, a wider acceptance of electronic office management in the workspace of public administration is required.

IV. ELECTRONIC RECORDS OF ACTIVITIES

According to Article 7 of the Regulation, documents are recorded in the information system of the office operations of the public law body. This is a mandatory provision for which there are no exceptions, for example such as that small organizations could continue to conduct paper-based office operations. This is also an important anti-corruption measure. According to Art. 9 of the Regulation, documents received through the information system of office operations or other information systems are processed electronically, recorded in the information system of office operations and, as a rule, are not printed. According to Art. 10 of the Regulation, on documents received in physical form, the name of the public legal body that received the document, the date of receipt, the numerical code and the unique code of the document are printed. The instruction in Article 12 regulates the content to be written on documents received in physical form. These are: the name of the issuing public body, the date of the receipt, the numerical code of the submission (classification code and serial number of documents within the case) and the unique code of the document (linear or 2D barcode). The unique code of the item is not the same as the unique identifier, it is the numerical code of the item in a machine-readable form.

The situation explained above means that the document submission first has to be entered into the information system, in order to print the specified data (usually a label will be used for practical reasons), which is a significantly better solution than the previous reception stamp, which was used to stamp the submitted document and then data was entered manually. With this kind of manual process it was possible to enter data later and, for example, "adjust" the reception time. This is how it was entered in the information system. Among the anti-corruption measures, we can also mention the provision of Art. 11 of the Regulation according to which the receipt of a document received in physical form is confirmed at the request of the party after recording in the information system of office operations. The afore-mentioned certificate is printed with the prescribed content from the information system. This completes a precisely arranged business process - the document needs first to be recorded in the information system, and then a confirmation of receipt is printed. [10] This new model prevents abuses and omissions possible with paperwork and manual entry of data on document application. It was recorded exactly when the document was received, it received its identifiers, and the confirmation of receipt is in accordance with this information.

As cases are now mandatorily kept in electronic records, art. 18 of the Regulation states that in the information system of office operations, records of first-

degree administrative proceedings, records of second-degree administrative proceedings and records of non-administrative proceedings are kept separately in the manner prescribed by the instruction. This is one of the key anti-corruption measures in the new Regulation, which significantly reduces the possibility of non-transparent and punishable behaviour and procedures. Namely, until now it was possible to keep paper registers and this was in fact the prevailing and dominant form of record keeping in public administration. Paper registers are individual papers of a larger format in which information about subjects was entered, and then after the end of the calendar year, these individual papers would be permanently bound. In practice, this was a generator of potential irregularities. It was, for example, trivial to leave blank columns where written ones would be entered later. Also, it was possible to reprint the entire page with different content (they are bound as we said at the beginning of the year for the next year). While sometimes used as a measure to correct incorrect or fill missing information, this possibility fostered behaviour that could and did lead to committing serious criminal offenses, but at the same time in practice it was very difficult to prove with paper trail. There were (and are) many examples of such irregularities if not outright misuses. For example, approvals for carrying out various activities on the sea coast, maritime domain, are granted on request. [11] It is therefore important who submitted the request first - with paper bookkeeping, it was illegal, but in practice it was easy to "reserve" an empty number for a favored bidder. Such behavior was difficult to detect or prove in a criminal investigation or subsequent court proceedings.

Among further anti-corruption provisions in the new Regulation, we can also mention that of Art. 15 which provides that by entering the first document or entry in the information system of office operations in the case records of administrative or non-administrative proceedings, a case is established. Namely, it is not possible to create an "empty" case, without going through a letter and then subsequently "adding" a written (either input - submission, or output - document) that empty case, which was the practice in some places, especially with output documents.

V. OTHER ANTICORRUPTION MEASURES

Among the provided anti-corruption measures (even if this provision is not exactly new), we can also include the provision of Art. 21 of the Regulation according to which the uniqueness of a document within a public legal body is indicated by a unique document designation.

The designation is data that forms an integral part of the document and is unique within the information system of office operations and contains the numerical designation of the body in whose information system the document is entered, the classification designation of the subject to which it belongs and the serial number in the subject, and is expressed in the form of a linear or 2D bar code. Therefore, every document in the public system has its own unique number.

Among the anti-corruption measures provided we can also mention the arrangement of powers on the information system according to Art. 31 of the Regulation, all officials of a public legal body must have access to the information system of office operations in accordance with the assigned

authorization decided by the management of the body. The Regulation does not elaborate this provision in detail, so in its application it is best to apply the official information security standard HRN EN ISO/IEC 27001:2017. [12]

Among the anti-corruption measures, we can certainly include the use of a qualified electronic signature and a qualified electronic seal in addition to a handwritten signature and a classic seal. Electronic seal and signature are defined by Regulation (EU) no. 910/2014 [13]

Shortly after the adoption of the Regulation 910/2014, the use of electronic seals and signatures was also defined by the basic regulation governing administrative procedure - the Law on General Administrative Procedure [14], where Article 97 stipulates: "*The decision shall be signed by an authorized official by hand or with a qualified electronic signature. A decision issued from the information system of a public legal body can only be certified with a qualified electronic seal.*"

Although the use of electronic signatures in state and public administration is still more an exception than a rule and is just beginning (the latest introduction project is ongoing from 2022)[15], many certificates and records have been issued with an electronic seal over last decade and a half, for example those from the e-Citizens system [16]. The introduction of e-signatures and e-seals is a milestone anti-corruption measure. In the last thirty years of Croatian legal practice, there have been numerous cases of falsified documents, from simple travel orders, where expert signatures were also carried out in the proceedings to forgeries of medical records required for the pension system or documents required by the court company register or land registry. The use of an electronic signature represents significantly greater security.

Finally, according to the Regulation, Art. 62. the information system of office operations ought to have the ability to connect and exchange data with the information system for monitoring the implementation of the law regulating the general administrative procedure in which the application of legal institutes in administrative procedures is recorded. The Law on General Administrative Procedure has a similar provision, facilitating remote monitoring by the competent ministry (currently Ministry of Justice and Administration).

The Republic of Croatia has an extremely large number of public law bodies, so their supervision on the ground was complex, expensive and deficient (for example, Croatia has 555 local cities and municipalities as self-government units in addition to 20 regional units - counties). Then there are hundreds of public institutions such as schools and numerous other organizations Regulation is applicable to. These provisions facilitate the possibility for the officials of the ministry in charge of supervision to carry out the same remotely, without the need to go out into the field. The very possibility of such supervision will have an anti-corruption chilling effect.

VI. UNDERSTANDING, IMPLEMENTING, AND AUDITING ISO 37001 ANTI-BRIBERY MANAGEMENT SYSTEM (ABMS) IN PREVENTING BRIBERY IN PUBLIC OFFICE ADMINISTRATION

Bribery and corruption in general are global problems that pose significant threats to economies, societies, and organizations, degrading the rule of law and introducing an aspect of legal uncertainty discouraging to societal development and economic investment. It is of no wonder that apart from government activities - more stringent legislation, better white collar crime detection rates and improving prosecution capabilities by public authorities, a variety of initiatives to understand and prevent these issues have appeared to augment these efforts in a form of industry self-regulation standards.[16]

The International Organization for Standardization (ISO) has developed the ISO 37001 Anti-Bribery Management System (ABMS) to help organizations combat bribery and corruption as a framework for organizations to prevent, detect, and respond to bribery (International Organization for Standardization, 2016). It aims to help organizations establish an ethical culture and maintain compliance with anti-bribery laws. [17]

The standard was released in October 2016. It can be used as a certification standard because it is a so called Type A standard. [18] The "high-level structure" and architecture of ISO 37001 are the same as those of all other contemporary management systems standards. The first of the standard's two parts outlines the conditions for an anti-bribery management system. A thorough annex explains broad features of anti-bribery management and provides information on use. The integrated management system may also use it as a module for quality management, environmental management, and other management functions. [19]

Understanding the ISO 37001 standards is beneficial for several reasons:

- Corruption is a global concern
- Legal compliance
- Reputation and trust

As bribery and corruption are on the rise worldwide, with devastating economic and social consequences, industry self-regulation standards can augment existing and future regulation efforts and enforcement.[20] Understanding the ISO 37000 family of standards may help organizations address concerns by developing effective preventative internal anti-bribery policies and procedures that are easy to follow, audit and act upon. [21]

Adhering to these standards can also help organizations demonstrate compliance with various international and national anti-bribery laws. This understanding can facilitate better risk management and reduce potential legal penalties. Organizations that understand and implement antibribery controls can signal their commitment to ethical

business practices, enhancing their reputation and trust among stakeholders. [22] As with most self-regulation standards, while the process of implementation requires an investment in time and resources, its successful completion requires several key elements, such as the genuine commitment of the highest level of the organization management. This includes establishing an anti-bribery policy, assigning responsibility for anti-bribery efforts, and providing necessary resources. Further, an organization looking to implement needs to undertake an honest and thorough risk assessment activity, investigating and evaluating potential bribery risks, which will in turn result in applying adequate controls and measures to mitigate recognized risks. Finally, adequate training and awareness program and measures for continuing monitoring and improvement are also required. [23]

Finally, self-regulation standards such as ISO standards often contain provisions ensuring their continuing application and validity of the certification. As with all similar standards, there are various process phases involved in auditing conformity. [24] These procedures guarantee that an organization's Anti-Bribery Management System (ABMS) is successfully maintained and improved over time. To independently ascertain the status of the certification, the organization chooses an auditor or audit team with the necessary credentials and anti-bribery management system experience before the audit can start. To ensure a fair evaluation, the auditor should be impartial and independent. To comprehend the design and use of the ABMS, the auditor examines the organization's anti-bribery policy, practices, and other pertinent material. During the audit, this review aids the auditor in locating probable non-compliance hotspots and areas that need more research. Often, an external auditor visits the organization's location to collect proof of the use and efficacy of the ABMS, conducts interviews with staff members, management, and pertinent outside parties. The auditor evaluates how well the organization's ABMS complies with ISO 37001 criteria, relevant anti-bribery regulations, and the anti-bribery policy of the organization. Any non-conformities, observations, and areas for improvement noted during the audit are recorded by the auditor. To achieve a thorough grasp of the issues and their ramifications, these results are then reviewed with the organization's management. The auditor writes an official audit report outlining the findings, conclusions, and any suggestions for improvements or remedial actions. The organization then carries out a corrective action plan based on the audit's findings to deal with any non-conformities or potential areas for improvement. To confirm the efficacy of the corrective actions and guarantee continuous adherence to ISO 37001 criteria, the auditor may undertake follow-up audits or reviews. [25]

The auditing procedure should be seen as a chance for organizations to continuously enhance their ABMS. The identification of improvement areas, the promotion of a compliance culture, and the reduction of bribery risks are

all aided by routine internal and external audits. Regular audits contribute to the development of an ethical culture, transparency, and compliant business processes in addition to helping to maintain compliance. [26]

VII. CONCLUSION

As we stated in the introduction, by-laws in the Republic of Croatia are adopted without extensive explanations of individual provisions, but in the new Regulation on office management in public administration we see several very important changes that can be classified as anti-corruption related provisions, and roughly divided into three categories.

The first is the mandatory keeping of electronic records in the information system. At first glance, this measure is contrary to the principle of frugality, especially in the case of smaller organizations, but it is precisely the small organizations with only a few employees where abuses and pressure on officials (often a single clerk in charge of the office) to do something contrary to the regulations can be expected the most. Data entered into the information system is significantly more difficult to change *ex post facto*, either in terms of content or in terms of changing the time when it was received.

The second is the increasingly widespread use of advanced electronic signatures and seals, which significantly increases the reliability of signatures - as we mentioned, with handwritten signatures, especially when we are talking about a large number of documents, officials will usually use some abbreviated forms of signature that are very difficult to forensically check and establish their originality.

Ultimately, even if not explicitly stated, the new model of electronic office business represents the basis for the introduction of further advanced information technologies such as blockchain based services and is also the subject of interest of the European Commission. As elaborated in the EC document *Blockchain for Digital Government: "In the Public Administration field, blockchain technology can potentially be leveraged in a variety of contexts, and strengthen different use cases in terms of security, interoperability and transparency."*[28]

While there is always room for further development, the regime established by the new Regulation is definitively an improvement especially as it respects the reality that not everything can be managed electronically immediately, but leading in the direction of fully digitized work processes, as the technical and organizational capabilities of those subject to the Regulation develop and new technologies are introduced, taking into account the need to strongly and actively work in terms of preventing abuses, especially corruption and bribery.

In this sense, the Croatian example can be interesting for other countries, especially in the European East and Southeast, and especially for countries that are candidates for future accession to the European Union.

REFERENCES

- [1] Regulation on office management - Uredba o uredskom poslovanju, Narodne novine,* 75/21
- [2] Instruction on numerical signatures of documents and records of office management activities - Naputak o brojčanim oznakama pismena te sadržaju evidencija uredskog poslovanja, Narodne novine, 132/21
- [3] Zakon o sustavu državne uprave, Narodne novine, 66/19
- [4] G. Vojković, (2022) "Electronic Office Management of Public Administration in Croatia". Skala, K. (ed.) MIPRO 2022 45th Jubilee International Convention Proceedings.
- [5] R. Odbaša, Uredsko poslovanje tijela državne uprave Republike Hrvatske (skripte), Osijek, 2007.
- [6] HRN ISO 15489-1:2016 Information and documentation -- Records management -- Part 1: Concepts and principles (ISO 15489-1:2016), Hrvatski zavod za norme, Zagreb, 2016
- [7] ISO 15489-1:2016(en), ISO, Available: <https://www.iso.org/obp/ui/#iso:std:iso:15489:-1:ed-2:v1:en>. [Accessed 7 April 2023]
- [8] Ministry of Justice and Public Administration (Ministarstvo pravosuđa i uprave), Frequently Asked Questions on the new Regulation on Office Management (Često postavljana pitanja u vezi primjene Uredbe o uredskom poslovanju,) <https://rdd.gov.hr/UserDocsImages//dokumenti/%C4%8Cest%20postavljana%20pitanja%20-%20Uredba%20o%20uredskom%20poslovanju.docx> [Accessed 7 April 2023]
- [9] Ministry of Justice and Public Administration, National Public Administration Development Plan 2022-2027 (Nacionalni plan razvoja javne uprave za razdoblje od 2022.) do 2027. godine. March 2022. https://mpu.gov.hr/UserDocsImages/dokumenti/Strategije,%20planovi,%20izvje%C5%A1%C4%87a/Nacionalni%20plan%20razvoja%20javne%20uprave%20za%20razdoblje%20od%202022_2027.pdf [Accessed 7 April 2023]
- [10] G. Vojković: Uredsko poslovanje, spisovodstvo i upravljanje pismohranom, Narodne novine, Zagreb, 2018.
- [11] D. Bolanča, "Koncesijska odobrenja na pomorskom dobru", Pomorski zbornik, vol.38, br. 1, str. 159-170, 2000. [Online]. Dostupno na: <https://hrcak.srce.hr/53009>. [Citirano: 22.03.2023.]
- [12] HRN EN ISO/IEC 27001:2017, Information technology -- Security techniques -- Information security management systems -- Requirements (ISO/IEC 27001:2013 including Cor 1:2014 and Cor 2:2015; EN ISO/IEC 27001:2017)
- [13] Uredba (EU) br. 910/2014 Europskog parlamenta i Vijeća od 23. srpnja 2014. o elektroničkoj identifikaciji i uslugama povjerenja za elektroničke transakcije na unutarnjem tržištu i stavljanju izvan snage Direktive 1999/93/EZ (SL L 257/73 28. 8. 2014. – u daljnjem tekstu: Uredba (EU) br. 910/2014)
- [14] General Administrative Process Act of the Republic of Croatia - Zakon o općem upravnom postupku, Narodne novine, 47/09, 110/21.
- [15] Introduction of electronic signature and electronic seal, <https://vlada.gov.hr/vijesti/uvodjenje-e-m-potpisa-i-e-m-pecata-digitalizirat-ce-poslovanje-drzavne-i-javne-uprave/33866> [Accessed 7 April 2023]
- [16] Public e- government service of the Republic of Croatia - E-Gradani, Informacije i usluge, gov.hr.
- [17] Kohl, H. (2020). Standards for Management Systems - Standards for Compliance, Anti-bribery and Corporate Social Responsibility, p. 358, Springer Nature Switzerland 2020. doi:10.1007/978-3-030-35832-7
- [18] *Ibid.*
- [19] T.P. Kartika, N.R. Pratama, M. Dachyar: The Implementation of Anti-Bribery Management System Designed to Mitigate the Bribery Risk in State-Owned Enterprises: A Case Study of the Indonesia Agribusiness Industry, Proceedings of the First Australian International Conference on Industrial Engineering and Operations, Management, Sydney, Australia, December 20-21, 2022
- [20] D.S. Handinita, L. Julaha, D.L. Soewito: Strengthening Anti-Bribery Governance through Integration of GCG with SNI ISO 37001: 2016 ABMS, Asia Pacific Fraud Journal, vol 6.1. June 2021
- [21] Transparency International, Corruption Perception Index 2022, available at: <https://www.transparency.org/en/cpi/2022>, [Accessed 7 April 2023]
- [22] T. Mostovei: Perspectives for Implementation of the Anti-bribery Management Systems in the Republic of Moldova, Eurolimes, pp. 393, 2018
- [23] H. Gehring, JP Mean: Implementing ISO 37001 to Manage Your Bribery Risks, Global Trade and Customs Journal Vol.3/5 p. 191 (2018).
- [24] ISO 37001 – A Complete Guide: Practical Tools for Self-Assessment, The Art of Service, Edition 2020 and 2021.
- [25] *Ibid.*
- [26] *Ibid.*
- [27] L. Veselovska, J. Zavadsky, Z. Zavadzka: Mitigating bribery risks to strengthen the corporate social responsibility in accordance with the ISO 37001, Corporate Social Responsibility and Environmental Management, vol 27/4 July 2020
- [28] European Commission, Joint Research Centre, Digital Economy Unit (JRC/B6), Blockchain for digital government, available at: <https://joinup.ec.europa.eu/sites/default/files/document/2019-04/JRC115049%20blockchain%20for%20digital%20government.pdf> [Accessed 7 April 2023]

* Narodne novine is the official gazette of Republic of Croatia.