

**GREECE – NATIONAL TRANSPARENCY AUTHORITY
NATIONAL STRATEGIC ACTION PLAN 2022 – 2025**

4. Internal policies, practices, or requirements to periodically evaluate legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption

The evaluation of the **National Strategic Plan for Combating Corruption** (hereinafter referred to as NACAP) is one of the practices applied by the National Transparency Authority (NTA) of Greece to evaluate legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption.

By law (4915/2022), NACAP constitutes Greece's national strategy for combating and preventing corruption, which includes interventions and projects aimed at preventing and fighting corruption, strengthening transparency, integrity and accountability. Through a coherent framework of actions focused both on targeted sectoral interventions as well as on horizontal reform strategies, the adequacy of all the actions undertaken to prevent and fight corruption is being evaluated on a systematic basis.

NTA is the competent authority for the monitoring of the implementation progress of the NACAP actions as well as for their evaluation and update.

NACAP 2022 – 2025, structured in 3 Parts (pillars), **Investigation/Control, Prevention, Raising Awareness**, is a dynamic four-year policy tool for the design, implementation, monitoring, and evaluation of horizontal and sectoral actions and an effective mechanism for coordinating the action of public policy actors in which synergies are developed with both the private sector and civil society.

Based on five (5) critical axis/categories that include the **legal framework, strategic coordination, operational capacity, digital transformation, and raising awareness**, NACAP formulates a **holistic approach to the prevention of and fight against corruption**. NACAP 2022–2025 comprises **one hundred and twenty-nine (129) actions**, the scope and content of which were specified in cooperation between the NTA and twenty-four (24) public policy institutions after an extended consultation took place. The categories of actions contained in the action plan are indicatively summarized in the following figure:

	LEGAL FRAMEWORK	Codification of existing legislation	Adoption of EU Directives	Updating the monitoring system of Disciplinary Cases in the PA	Regulatory interventions in high risk sectors
	STRATEGY CO-ORDINATION	Improve effectiveness of Audit Bodies	National Coordinating Body for Audit & Accountability	National Integrity System	Risk Based Audit Planning
	OPERATIONAL CAPACITY	Audit and Integrity Trainings	Standardisation of Methodologies Guidelines	Codes of Ethics/Deontology /professional conduct	Monitoring and Evaluation Mechanisms
	DIGITAL TRANSFORMATION	Risk Assessment and AI E-Tools	Improved Access to Public Databases	Modernising Digital Infrastructure	Digitisation of administrative procedures
	RAISING AWARENESS	Foster Citizens Participation	Partnerships for Integrity	Targeted Educational Interventions	Publicity and Promotion

Figure 1. Categories of NACAP actions 2022 – 2025

At the center of the design is the establishment of a development process of a simple and coherent National Plan, with specific objectives, within the framework of targeted interventions of high added value. The core of the structure of the plan is to place particular emphasis on maximizing the impact of interventions and strengthening coordination by developing synergies with the private sector and civil society.

Each NACAP’s pillar is associated with a Strategic Objective:

- Enhancing the Audit/Investigations framework for the combat of fraud and corruption,
- Strengthening Integrity, Accountability and Transparency,
- Engaging Citizens in the fight against corruption

While Strategic Objectives are further broken down into nine (9) Specific (as depicted in Fig.2). *More information on Strategic Objectives in ANNEX.*

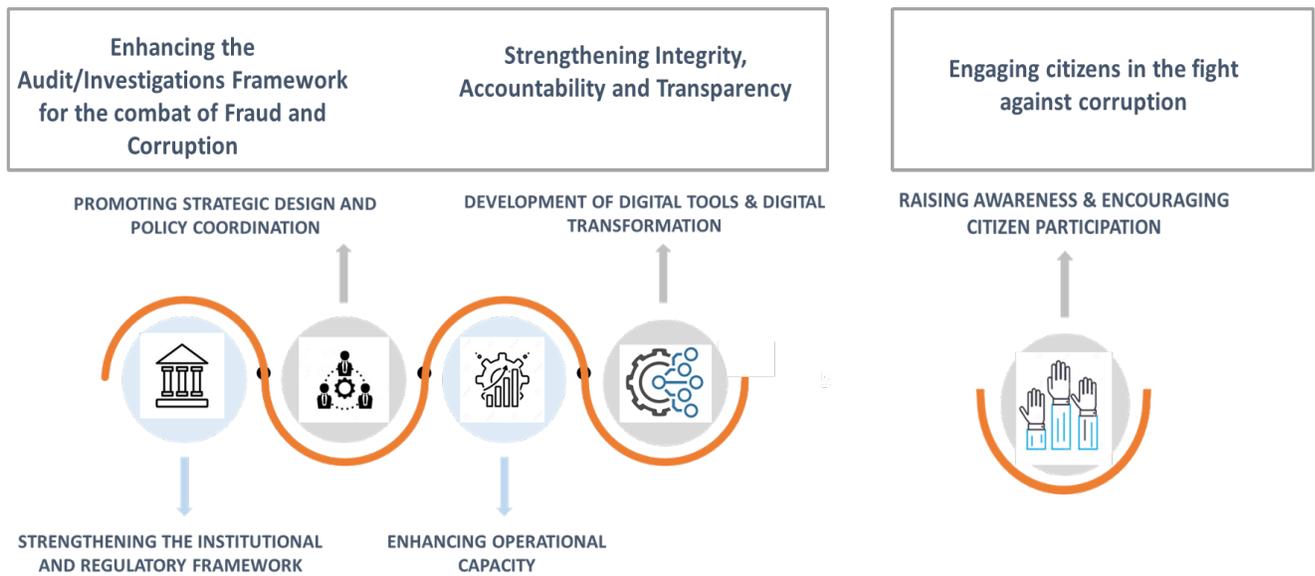


Figure 2. Specific Objectives of NACAP 2022 – 2025

Approval of NACAP – Commitment at the highest level

The Council of Ministers has approved NACAP 2022-2025 (GG138A’/13.7.2022)¹. To better coordinate the process of drafting and updating the NACAP, a Central Coordination Committee has also been established. Each year (every April) the Council of Ministers invites NTA to present the progress of the NACAP on an annual basis².

Changes – Amendments of NACAP

The NTA’s Governor may determine the procedures for the elaboration, monitoring, evaluation and redesign of NACAP. Any changes related to NACAP’s structure, strategic or specific objectives shall be approved by the Council of Ministers while changes/amendments concerning the content and planning of NACAP’s actions

¹ The Prime Minister or the Minister responsible for ensuring unity and coherence of the government's work recommends the NACAP for adoption and approval by the Council of Ministers in December of the preceding calendar year, from the first year of the NACAP’s period. After its approval, an Act of the Council of Ministers (ACM) is issued, which published in the Government Gazette.

² With an exemption of the year of the NACAP’s implementation.

can be approved by the Central Coordination Committee.

5. Structures or institutions responsible for evaluating relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption

The above-described mechanism allows all the bodies, that have undertaken actions included in NACAP, to propose and adopt amendments and changes based on the needs identified in any of the axes or categories. *However, since all the actions are agreed upon in the initial phase, such practices are not frequent in practice.*

Through the evaluation process, the competent authorities self-evaluate their performance in close cooperation with NTA during the implementation of their actions in order to achieve their objectives and deliverables.

Apart from the systematic basis of the evaluation, changes and amendments in terms of legislative initiatives or other administrative measures can be proposed and decided on an ad hoc basis.

6. Processes for periodically evaluating relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption

NTA is responsible for the establishment of NACAP 2022-2025 and for the monitoring and evaluation of its implementation in close cooperation with all relevant bodies. NACAP includes the national strategies for the public sector's areas and actions or projects of the Annual Ministries' Action Plans.

At a first stage, all actions are agreed upon and described in detail (content and related deliverables) within the framework of the Specific Objectives. In parallel, the communication channels among the stakeholders are clarified, along with the implementation timeframe.

The **implementation progress**, of all the actions included in NACAP, is reported regularly so that effective feedback can be provided with all the necessary data. Moreover, an electronic form (PF) is used by the implementing bodies to report the progress made on a semester-by-semester basis, while working meetings are held to provide directions and clarifications and ensure that all parties involved are familiar with the reporting processes and applications. All the actions' outcomes are measured by twenty-six (26) output indicators.

The main stakeholders and their role in NACAP's implementation are presented below:

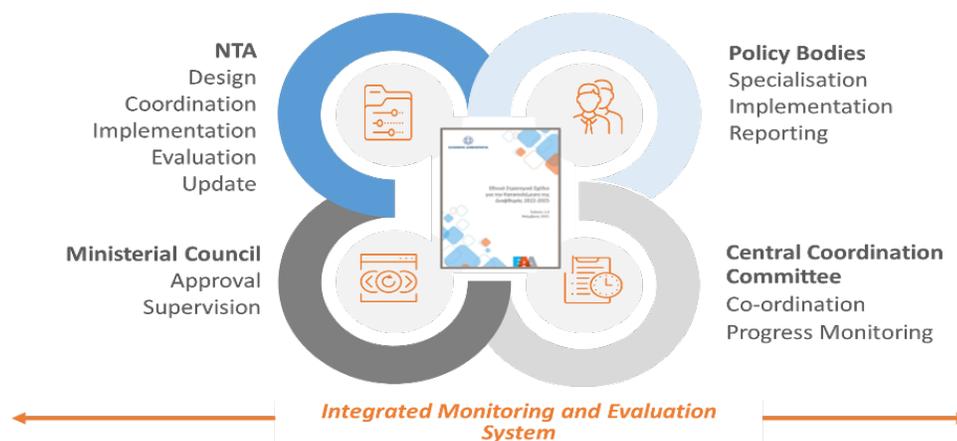


Figure 3. Governance scheme of NACAP 2022 – 2025

The **National Transparency Authority (NTA)** as the competent authority for the coordination, monitoring, reporting, evaluation, and update of the Action Plan works in close cooperation with the **implementing bodies**.

The **Central Coordinating Committee (CCC)** is responsible for the coordination and supervision of the consultations and the finalization of the content of the actions included in NACAP. It also approves changes concerning the content of NACAP’s actions. The CCC is composed of representatives from the Presidency of the Government, the General Secretariat for Coordination, the Ministries of Interior, Finance, Justice and Digital Governance and the General Secretariat of Information Systems. The Court of Auditors also participates, but as an observer. The body is chaired by the Governor of NTA.

The **Council of Ministers (CoM)** approves NACAP as well as changes/updates related to the structure, the Strategic and/or Specific Objectives of the Plan. The CoM also monitors NACAP’s implementation progress on an annual basis.

7. Requirements in relation to the frequency of these evaluations

The requirements taken into account for the design of the National Anti-Corruption Action Plan aim at developing a modern system of public integrity and improving the effectiveness of auditing/control mechanisms.

The use of modern e-government tools and digital infrastructures establishes easy access as well as interoperability between public databases, as a means of increasing transparency and enhancing the Greek State’s capacity to prevent and detect corruption.

The intervals chosen for the action plan evaluation is consistent with the objective of enhancing the effectiveness of the plan. The **flagship projects** included in NACAP³, though they demand some time to bring fruitful results, are grouped together to enhance the synergy and complementarity of NACAP’s actions on the systemic evaluation base.

For more information on NACAP 2022-2025 consult also: <https://aead.gr/publications/esskd/esskd-2022-2025>

³ such as the development of a National System of Public Integrity, the regulatory interventions in high-risk policy fields (lobbying, gift policies, conflicts of interest, protection of whistleblowers, the development of a horizontal network of integrity advisors in public administration, etc. the actions for the training of civil servants and executives of other institutions, and the awareness raising within society.

ANNEX:

The nine (9) Specific Objectives (SG) of the National Strategic Plan for the 2022-2025 period include:

Categories of Actions of the Plan

Parts A and B – DETECTION (4) and PREVENTION (4)

S.G. Strengthening the institutional and regulatory framework includes actions related to the:

- Codification of legislation in policy areas that present a high risk of fraud and corruption, such as forest legislation, the Code of Spatial Planning and Urban Development and the codification of legislation for local authorities of the first and of the second degree,
- Strengthening of the institutional framework for the recovery and management of assets having derived from criminal activities,
- Adoption of European Guides, Regulations and Recommendations, such as the adoption of the 2019/1153 European Directive laying down rules to facilitate the use of financial and other information for the prevention, detection, investigation or prosecution of certain criminal offences and also repealing Council Decision 2000/642/JHA,
- Improvement of the framework for monitoring disciplinary cases in the public administration,
- Introduction of regulations to tackle corruption in high-risk areas, such as, but not limited to, the introduction of regulations on the obligation to maintain and publish a list of sponsorships received by NGOs active in the field of Migration and Asylum,
- Implementation of the National Internal Control System and the
- Institutionalization of a risk management system in Public Administration.

S.G. Promoting strategic design and strengthening coordination mechanisms includes actions related to the:

- Reorganisation and modernization of the procedures of control mechanisms, such as, but not limited to, the upgrading of the mechanism for monitoring the disciplinary procedure in the public sector,
- Identification and addressing of overlaps while strengthening the cooperation of audit bodies,
- Monitoring and evaluation of national sectoral strategies and operational plans, such as the national strategy for the fight against fraud in the co-financed programs of the NSRF,
- Introduction and implementation of horizontal reform strategies, such as the development of the Network of Integrity Advisors.

S.G. Enhancing operational capacity includes actions related to the:

- Standardization of procedures and documents, such as, but not limited to, the recording of procedures, controls and potential risks in the context of strengthening the effective operation of the Internal Control Unit in the Ministry of Migration and Asylum,
- Training of human resources in specialized topics, for example the Internal Control Unit of the Ministry of Health and the legal entities supervised by it,
- Development of internal operational directives, methodologies and standards and the

- Development of Codes of Conduct for civil servants serving in financial services, building and licensing services of Health-Regulated Establishments, Correctional Institutions, Procurement Units and in the Health sector.

S.G. Development of digital tools and implementation of digital transformation actions includes actions related to the:

- Development of risk analysis digital tools for the conduct of audits, such as the development of an Information System for the Management of Audits of the Agriculture Sector, the upgrade of the electronic platform "epothen", the development of a digital application for the issuance of an annual plan of NTA's systemic audits, based on the risk-based analysis methodology,
- Creation of an Integrated Information System for the management of recovered assets deriving from criminal activities and the
- Development of an integrated single portal for the reception of complaints related to corruption.

Part C – RAISING AWARENESS (1)

S.G. Raising awareness and encouraging citizen participation is further specialized in the following actions:

- Organisation of awareness-raising actions,
- Issuance of press releases and advertising spots,
- Conducting polls and surveys and publishing their results,
- Coordination and organisation of the cooperation with professional associations and chambers to develop standards, procedures and Codes of business ethics integrity, prevention of conflicts of interest and use of good commercial practices,
- Promoting cooperation with public and private bodies and businesses for the adoption and dissemination of Corporate Social Responsibility actions,
- Organising a structured dialogue for the exchange of views and “know-how’ with relevant public bodies in order to improve systems for preventing and combating corruption, integrity, accountability and transparency in the public and private sector,
- Training of civil servants, employees of public utility companies, private doctors, and other professionals,
- Raising awareness among young people;
- Co-organization of events and initiatives with civil society actors and
- Creation of training programs and training tools.