



HELLENIC REPUBLIC

# ANNUAL REPORT

20 20



NATIONAL TRANSPARENCY AUTHORITY



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# ACRONYMS + ABBREVIATIONS

<b>ACFE</b>	Association of Certified Fraud Examiners
<b>AFCOS</b>	Anti-Fraud Coordination Service
<b>AMIF</b>	Asylum, Migration and Integration Fund
<b>BI</b>	Behaviour Insight
<b>CF</b>	Cohesion Fund
<b>COCOLAF</b>	Advisory Committee for the Coordination of Fraud Prevention
<b>COSO</b>	Committee of Sponsoring Organizations of the Treadway Commission
<b>DG-HOME</b>	Directorate-General for Migration and Home Affairs
<b>DG-REFORM</b>	Directorate-General for Structural Reform Support
<b>DPO</b>	Data Protection Officer
<b>EAFRD</b>	European Agricultural Fund for Rural Development
<b>EAGF</b>	European Agricultural Guarantee Fund
<b>EEA</b>	European Economic Area
<b>EMFF</b>	European Maritime and Fisheries Fund
<b>EPATHLA</b>	National Platform for Sport Integrity
<b>ERDF</b>	European Regional Development Fund
<b>ERM</b>	Enterprise Risk Management
<b>ERP</b>	Enterprise Resource Planning
<b>ESF</b>	European Social Fund
<b>ESOEL</b>	National Coordinating Body for Audit and Accountability
<b>FAQs</b>	Frequently Asked Questions
<b>FEAD</b>	Fund for European Aid to the Most Deprived
<b>GAF</b>	Working Group on Combating Fraud
<b>GRECO</b>	Group of States Against Corruption
<b>IAPR</b>	Independent Authority for Public Revenue
<b>ICS</b>	Internal Control System
<b>IIA</b>	Institute of Internal Auditors
<b>INTOSAI</b>	International Organization of Supreme Audit Institutions
<b>IPPF</b>	International Professional Practices Framework
<b>ISO</b>	International Organization for Standardization
<b>M.C.</b>	Major Category
<b>NCPA</b>	Network of Corruption Prevention Authorities
<b>NEIWA</b>	Network of European Integrity and Whistleblowing Authorities
<b>NSRF</b>	National Strategic Reference Framework
<b>NTA</b>	National Transparency Authority
<b>OAFCN</b>	OLAF Anti-Fraud Communicators' Network
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>OJ</b>	Official Journal
<b>OLAF</b>	European Anti-Fraud Office
<b>PIF report</b>	Annual Report on the Protection of the EU Financial Interests
<b>RBAP</b>	Risk-Based Audit Plan
<b>RPA</b>	Record of Processing Activities
<b>SDOE</b>	Financial and Economic Crime Unit
<b>SPIO</b>	Senior Public Integrity Officials
<b>SRSP</b>	Structural Reform Support Programme
<b>UNODC</b>	United Nations Office on Drugs and Crime



## Governor's message



In a difficult and intense year for us all marked by the health crisis and its impact on all sectors of social activity, the National Transparency Authority has succeeded not only to effectively manage the serious problems caused, but also to implement its operational planning through a demanding organisational change, creating a dynamic and innovative single body in the field of strengthening transparency and combating corruption.

The success of this project would not have been possible without the effort and contribution of the Authority's officials, who with hard and methodical teamwork responded to the increased needs of the new operating model, leaving their personal mark on all the actions of the Organisation at both national and international level.

By taking joint actions and signing cooperation agreements with our country's institutions and organisations, we sought to lay the foundations for taking advantage of every opportunity, with the ultimate goal of shaping an integrated framework for enhancing integrity, transparency and accountability, and promoting good governance.

Building on the professional experience and the scientific training of the NTA's staff, we proceeded to the standardisation and modernisation of our operational methodologies, based on international standards and good practices, with the aim of improving the audit function and developing innovative corruption prevention policies, as well as implementing the digital transformation of the Authority's key functions.

In 2020, flagship actions in the field of education were also developed to raise awareness among the student community on issues of integrity and accountability, as a means of preventing and deterring corruption. In cooperation with international organisations in education and other crucial policy areas, we developed communication channels and highlighted our work, enjoying international recognition and consolidating the international presence of the Authority, aiming at the transfer of know-how and the implementation of targeted interventions.

With collective work and unanimity, we continue our effort in 2021 to assist the State in the fight against the pandemic for the protection of public health. At the same time, we continue with the same commitment and determination our work in all three key pillars of action, to modernise our auditing mechanism, to develop prevention and integrity policies, and to raise awareness of society, in order to strengthen the role of citizens in the fight against corruption.

**NTA Governor**  
Angelos Binis

## Chairman's message



In the particularly difficult days our country is going through, in the midst of a pandemic that sweeps the entire planet and which greatly affects everyday life, with economic and social consequences, the public sector is called upon to maintain a high level of welfare for citizens while ensuring socio-economic cohesion.

The COVID-19 pandemic and its impact are a challenge for public administrations, which are called upon to improve the effectiveness, efficiency and quality of their services.

The National Transparency Authority, assisting in the fight to comply with the measures to limit the spread of the virus, prioritised the protection of public health against the consequences of the pandemic, reviewing and adapting its operational function, without this affecting either quantitatively or qualitatively the rest of the audit work.

The Management Board is monitoring the work of the Inspectors-Auditors which falls within the responsibilities of the NTA, as well as the work performed in the framework of the Authority's participation in the Task Force against the coronavirus.

The Management Board, in the performance of its duties, consistently serves the objectives of the NTA and acts as an advisory body on issues of strategy and management of the Authority, monitoring through its meetings, and in cooperation with the Governor and its staff, the progress of the projects carried out by the Authority's organisational units, the budget of expenditure, the assessment of strategic and operational objectives, as well as the timetables for their implementation.

Acknowledging the remarkable effort made in 2020 by the NTA's staff and considering the additional work that Inspectors-Auditors were asked to do to ensure proper compliance with the measures for the protection of public health, the Management Board is convinced that the results of this effort will be immediately visible, justifying the citizens' confidence in the State and its officials.

### Chairman of the Management Board

Menelaos Tsouplakis

## Introduction

The annual report of the National Transparency Authority provides objective and comprehensive information on all the activities of the Authority, which were carried out during 2020, as well as the actions included in its operational planning for the following year.

The report is provided for in article 85(5) of Law 4622/2019<sup>1</sup> and is a key tool for accountability and control of the Authority's action. It is submitted by the Governor of the Authority, after approval by the Management Board, to the Speaker of Parliament and to the relevant Committee on Institutions and Transparency, in order to be discussed in accordance with the Standing Orders of the Parliament. It is published in a relevant edition of the National Printing House and is posted on the Authority's website.

The second annual report on the Authority's activities is structured as follows:

- Organisation and Operation
- Report of Main Activities
- Operational Planning for 2021

The first section lays down the institutional operating framework, organisational structure and demographics of the Authority's human resources. It also describes the main actions carried out in the context of organisational change, which continued throughout 2020, its key axes being:

- Harnessing and Developing Human Resources
- Digital Transformation
- Standardisation of Operational Procedures
- Co-funded Technical Assistance Projects

The next section reports the main activities in the three main pillars of action:

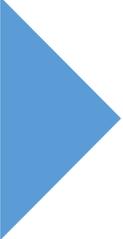
- Audit work of the Inspections and Audits Unit and Operational Functioning of the National Coordinating Body for Audit and Accountability (ESOEL)
- Strengthening Integrity and Accountability
- Raising Awareness

The same section presents the progress in the implementation of the actions of the National Anti-Corruption Action Plan (NACAP) 2018-2021 and its evaluation plan, and gives an initial outline of the structure and intervention logic of the new NACAP 2022-2025.

At the end of the same section the representation of the country in international, European and national anti-fraud and anti-corruption networks is mentioned, and the main points of the evaluations in which the Authority participates are summarised.

The last section presents the planning of the main projects and actions for 2021 that extend to all pillars of the Authority's operational functioning.

<sup>1</sup> Government Gazette, Series I, No 133



# 1 ORGANISATION AND OPERATION

## 1.1. Institutional Framework

The National Transparency Authority (NTA) was established by the provisions of Law 4622/2019, as amended and in force by Laws 4635/2019, 4637/2019 and 4727/2020. It is an Independent Authority without legal personality for the purpose of: a) enhancing transparency, integrity and accountability in the action of governmental bodies, administrative authorities, state entities and public institutions, and b) preventing, deterring, detecting and addressing fraud and corruption phenomena and acts in the action of public and private bodies and organisations.

The core of the competences of the NTA is based on the need to restore citizens' trust in public institutions. To this end, the Authority takes initiatives aimed at educating young people and involving society in the fight against corruption.

The strategic objective of the Authority is to develop and implement a coherent anti-corruption policy framework based on international recommendations and good practices, which is not limited to identifying and addressing corruption, but also extends to the areas of prevention and awareness-raising in society.

The Authority enjoys operational independence, administrative and financial autonomy and, apart from parliamentary scrutiny, it is not subject to control or supervision by governmental bodies, state entities or other administrative authorities. The Chairman, the members of the Management Board and the Governor of the Authority,

who are the management bodies of the Authority, are solely bound by law and their conscience and are not subject to hierarchical control or administrative supervision by governmental bodies or other administrative authorities or other public or private organisation, and enjoy personal and functional independence. They testify on matters relating to the competences of the Authority before the Parliament's Committee on Institutions and Transparency.

Five audit bodies and the General Secretariat Against Corruption were merged into the Authority, and their powers were transferred to the NTA. In the context of its responsibilities, the NTA carries out inspections and audits in all General Government bodies and services, including legal entities governed by public law, regional and local authorities, as well as their enterprises and the legal entities governed by public or private law that they supervise, state legal entities under private law and public enterprises or businesses, whose management is directly or indirectly designated by the State through an administrative act or by the state acting as a shareholder. The Authority's competence is extended to private bodies which enter into contracts with the State or are under certain conditions recipients of public funds.

The territorial jurisdiction of the NTA is extended throughout the entire territory. The Authority's staff may travel abroad to conduct investigations and collect data within the framework of their responsibilities, and cooperate with any



public and private body. Inspectors-Auditors may carry out preliminary investigations following Public Prosecutor's orders for cases for which an inspection-audit is or has already been carried out by the Authority, and for crimes committed by or involving officials of the bodies falling under the NTA's audit powers which are provided for by specific provisions of the Criminal Code.

Inspectors-Auditors performing audit or investigative duties, are not examined, prosecuted or sued for a reasoned opinion, recommendation or suggestion made or for acts or omissions accomplished in the performance of their duties. If the above-mentioned persons are examined or prosecuted or sued in the exercise of their duties before the criminal or civil courts, they appear in court and are represented by a member of the Legal Council of the State. In the field of prevention and deterrence of corruption, the Authority promotes the development of integrity and accountability policies through the design of the National Integrity System, the development of standards for the preparation of an impact report on corruption, the enhancement of transparency in private businesses and cooperation with other public authorities, through the exchange of know-how or the conclusion of Memoranda of Cooperation. In addition, it is responsible for monitoring and evaluating the implementation of the National Anti-Corruption Action Plan (NACAP) 2018-2021, and for designing the new National Plan for 2022-2025.

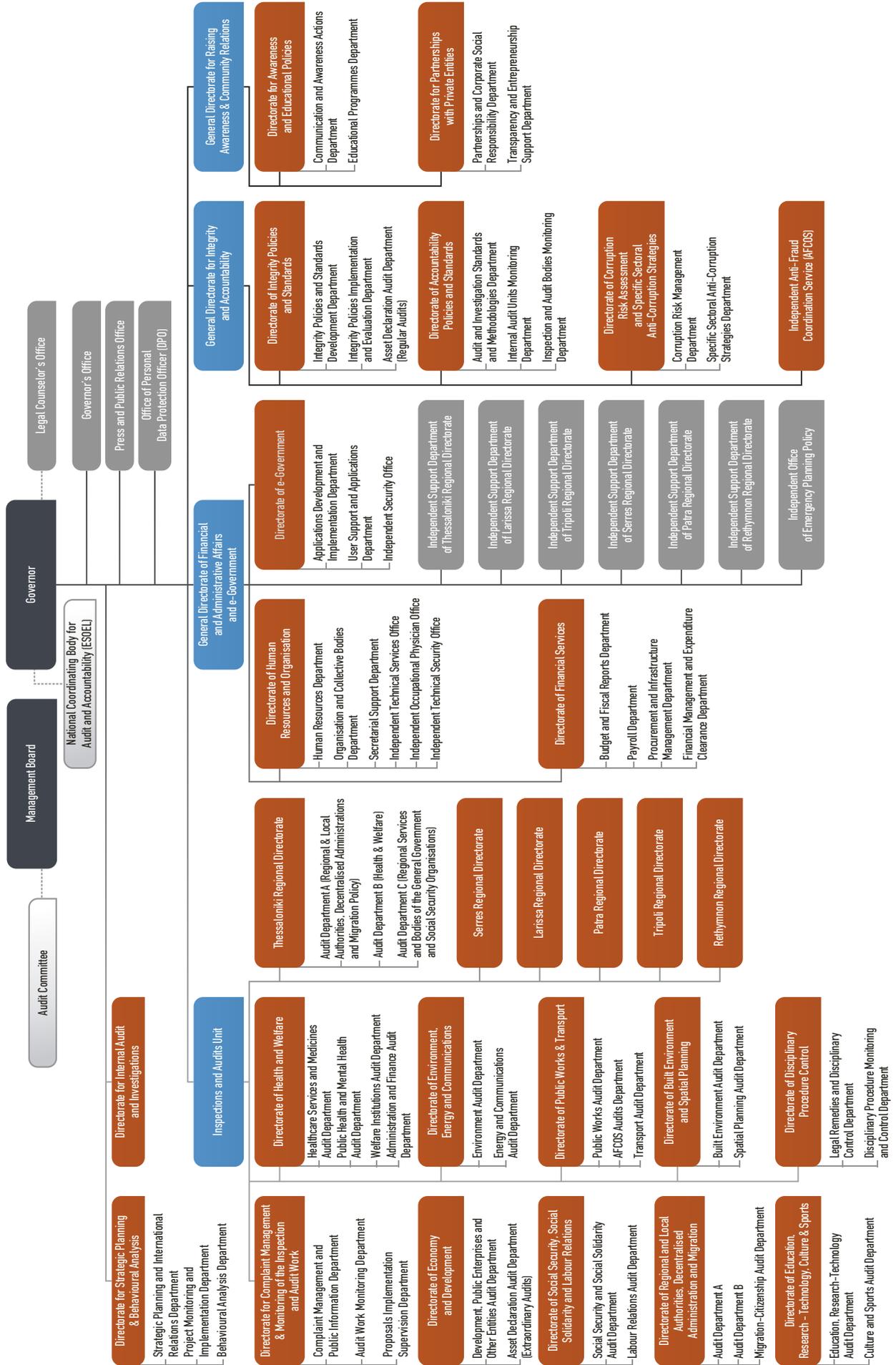
At the same time, the Authority is designated as the Hellenic Anti-Fraud Coordination Service (AFCOS), in accordance with Article 3(4) of Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 (OJ L248), in cooperation with the Financial and Economic Crime Unit, to the extent of its responsibilities.

Finally, the Authority develops international cooperation and represents Greece in international fora and organisations.

## 1.2. Organisational structure and Management Bodies

- **Issue of Governor's Decision 11699/2020 (Government Gazette, Series II, No 1991) on the organisational structure of the Authority**
- **Appointment of the Management Board on 31.07.2020**





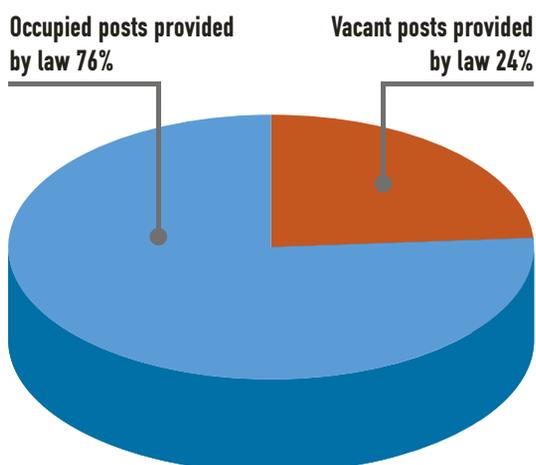
## 1.3. Key Data on Human Resources and Budget Allocation

### Human Resources

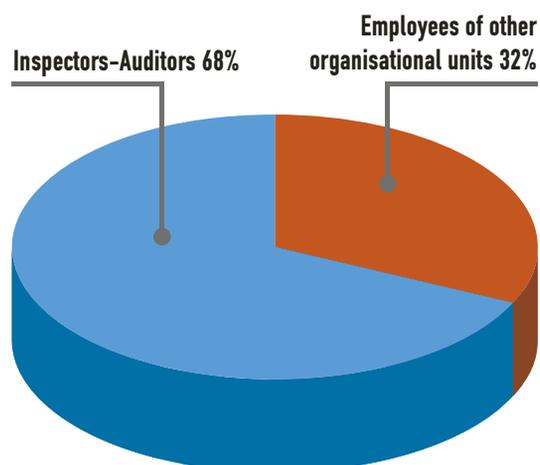


10 recruitment announcements

The number of administrative employees rose from 87 (2019) to 125 in 2020



Source: data generated and maintained by the NTA



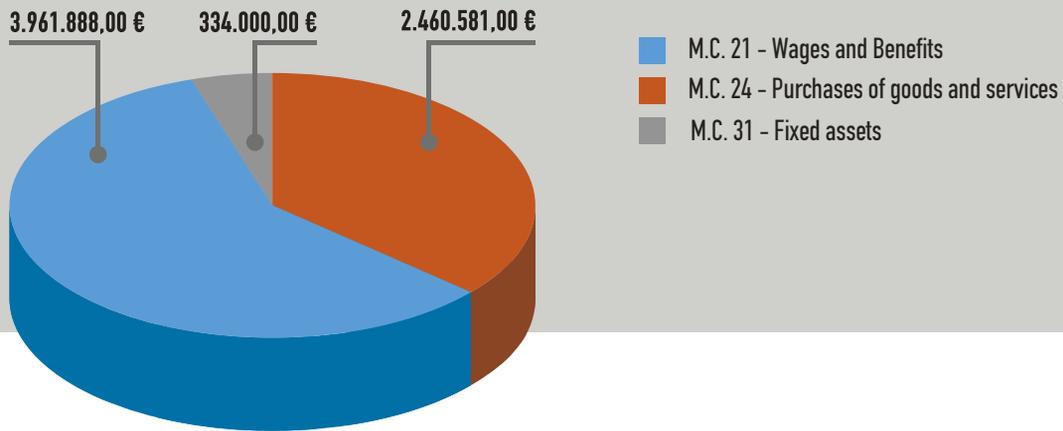
Source: data generated and maintained by the NTA

#### ALLOCATION AND OCCUPANCY OF POSTS PROVIDED BY LAW ON 31.12.2020

	POSTS PROVIDED BY LAW	INSPECTORS-AUDITORS	ADMINISTRATIVE EMPLOYEES
TOTAL	503	321	182
OCCUPIED POSTS PROVIDED BY LAW	382	259	123
VACANT POSTS PROVIDED BY LAW	121	62	59

Source: data generated and maintained by the NTA

2020 BUDGET ALLOCATION



Source: data generated and maintained by the NTA

1.4. Digital Transformation



## Redesign of Web Portal and Intranet

With a view to continuously improving its electronic services, the Authority proceeded with the in-house development of a new modern website ([www.aead.gr](http://www.aead.gr)), as well as a new intranet (<https://intranet.aead.gr>), which facilitates the immediate and valid information of staff on matters relating to the performance of their duties. In particular, the intranet provides the following possibilities:

1. update of individual details in case of changes,
2. direct access to codes, regulations, procedures, policies and up-to-date document templates,
3. access to an updated list of contact details of all the staff of the Authority,
4. distribution of digital material from events and actions, which the NTA organises or participates in,
5. continuous information on training and capacity building opportunities,
6. access to digital training content so that all the Authority's staff can attend and consult it asynchronously,
7. direct information on the administrative organisation of the Authority,
8. secure communication and direct technical support.



## Development of Applications

Officials of the Authority's Directorate of e-Government implemented the following new web applications:



Network of Internal Auditors of Public Administration

1. Network of Internal Auditors of Public Administration (<https://gpian.aead.gr>)



2. Application of anti-fraud monitoring and coordination (<https://afcos.aead.gr>)



3. COVID-19 toolkit (<https://covid19.aead.gr>)

## 1.5. Personal Data Protection

With a view to the Authority's compliance with the requirements of the General Data Protection Regulation (EU) 2016/679 and Law 4624/2019 introducing measures for implementing the Regulation and transposing Directive (EU) 2016/680 into national law, a Data Protection Officer (DPO) was appointed by decision of the Governor and a breach response team was set up to implement the General Data Protection Regulation (EU) 2016/679.

The team's work includes:

1. Supporting the Authority's services in the context of their compliance with the new European Regulation on the protection of personal data and Law 4624/2019.
2. Providing assistance and any kind of support to the Authority's Personal Data Protection Officer in the performance of his/her duties as described in Article 9 of Governor's Decision 11699/2020 (Government Gazette, Series II, No 1991) on the organisational structure of the Authority.
3. Submitting proposals for the implementation of appropriate technical and organisational measures in such a manner that the processing of data carried out by the Authority meets the requirements of the European Regulation on the protection of personal data and ensures the protection of the rights of the data subject.

## 1.6. Optimisation of Operational and Administrative Functioning

### 1.6.1. Standardisation of Operational Procedures

#### 1.6.1.1. Administrative Procedures and Standards

- Directive on the drafting of documents
- New entrants guide
- Code of Ethics and Good Administrative Behaviour
- Guidelines for observing working hours and granting leaves
- Clarifications for keeping attendance records and granting annual/parental leaves

#### 1.6.1.2. Security policies

The NTA has developed the following security policies to protect software applications and shield the Authority's information systems and networks:

- Internet usage policy
- Social media policy
- Teleworking policy
- Clean desktop policy
- Password policy
- Email policy

## 1.6.2. Co-funded Technical Assistance Projects

Use of resources from the Structural Reform Support Programme IV (SRSP IV)



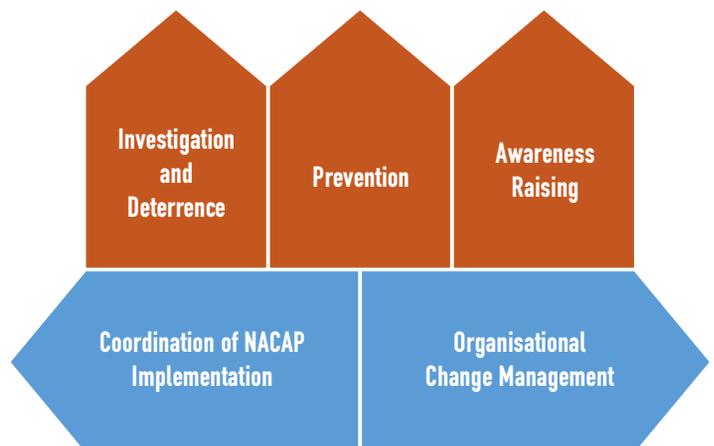
**NSRF**  
2014-2020

Inclusion of projects in the Operational Programme "Public Sector Reform" with an overall budget of **1.100.000 €**

## 1.7. Strategic Plan and Pilot Operational Goal Setting

### 1.7.1. Strategic Plan

- 5 strategic objectives for the period 2020-2024
- 3 thematic strategic objectives
- 2 horizontal strategic objectives



## Strategic Objective I: Upgrading the audit work

### PRIORITY AXES:

1.1 Modernisation of the framework of auditing

1.2 Development of modern standards and tools

## Strategic Objective II: Enhancing integrity and accountability

### PRIORITY AXES:

2.1 Development of the National Integrity System

2.2 Improvement of the Asset Declaration Audit System

2.3 Strengthening the Internal Control System

2.4 Strengthening public accountability mechanisms

2.5. Enhancing the operation of AFCOS

## Strategic Objective III: Strengthening the participation of society in the fight against corruption

### PRIORITY AXES:

3.1 Communication strategy for raising awareness of citizens & businesses

3.2 Promoting/Developing an Anti-Corruption Culture

## Strategic Objective IV: Coordination of the Implementation of the National Anti-Corruption Action Plan

### PRIORITY AXES:

4.1 Monitoring and assessment of NACAP implementation progress

4.2 NACAP evaluation and review

## Strategic Objective V: Organisational Change Management

### PRIORITY AXES:

5.1 Introduction of a new organisational and operational model

5.2 Design and implementation of digital transformation actions

5.3 Optimisation and development of human resources

## 1.7.2. Pilot Operational Goal Setting

At the beginning of the second half of 2020, the NTA successfully completed the first pilot operational goal setting for its organisational units.



# 2 REPORT OF MAIN ACTIVITIES

## 2.1. Report of Inspections & Audits Unit Work

### 2.1.1. Organisational Structure of the Inspections and Audits Unit

The Inspections and Audits Unit is structured as follows:

- a) Eight (8) thematic Directorates and two (2) Directorates with horizontal responsibilities.
- b) Six (6) Regional Directorates with territorial responsibility, as independent organisational units reporting directly to the Head of the Inspections and Audits Unit of the Authority.

The following organisation chart illustrates the organisational structure of the Inspections and Audits Unit.



## 2.1.2. Optimisation of the Operational Functioning of the Inspections and Audits Unit

For rational planning, standardisation and continuous monitoring of the audit work of the Inspections and Audits Unit, the following tools (codes, regulations, guides, procedures) have been designed, developed and adopted:

- Procedure for the Management of Prosecutorial Orders
- Professional Standards for the NTA's Audit Work
- Code of Professional Ethics of the NTA's Inspectors-Auditors
- Procedure for Monitoring the Audit Work
- Procedure for Monitoring the Implementation of Proposals-Recommendations of the Inspection and Audit Reports
- Procedure of Complaints Management-Evaluation
- Pilot application of risk analysis for prioritisation of systemic audits

## 2.1.3. Complaints Management

In October 2020, the Authority put in place a standard procedure for managing and evaluating all complaints received, with the aim of:

- Improving targeting and planning of audits
- Objectively managing complaints on the basis of criteria
- Reducing overlapping responsibilities
- Handling complaints directly and prioritising them based on their severity and documentation
- Speeding up audit procedures
- Maximising effectiveness in complaints management
- Strengthening public confidence in addressing corruption

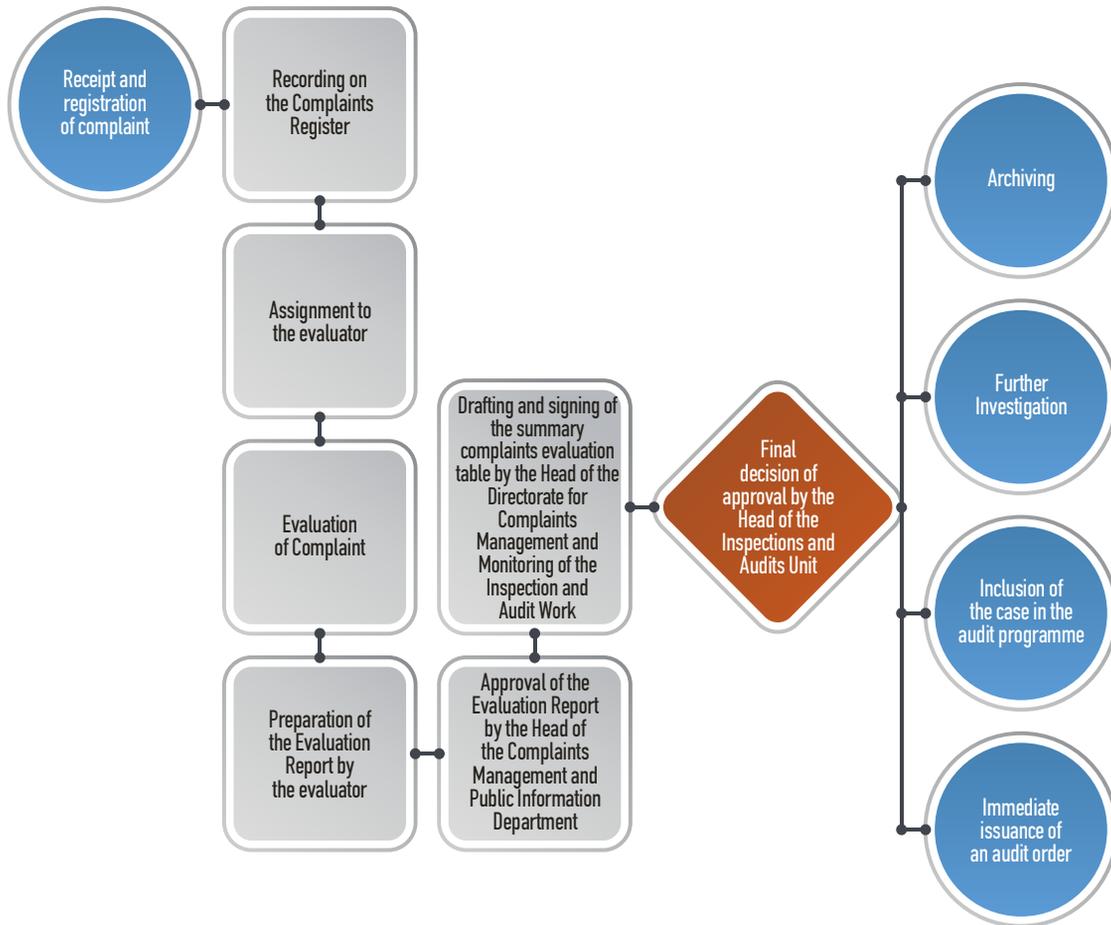
### The procedure includes:

- Evaluation criteria and their rating
- Calculation of the overall score of each complaint
- Definition of categories of complaints
- Classification of a complaint into a category according to its score
- Taking or not taking audit actions depending on the score

and outcome of the complaint:

- Archiving
- Further investigation
- Inclusion of the case in the audit programme
- Immediate issuance of an audit order

Flow Chart of Complaints Management-Evaluation Procedure



## 2.1.4. Disciplinary Competencies of the NTA

The disciplinary competencies of the NTA are important for speeding up and supervising the proper functioning of the disciplinary investigation procedure.

The operational objectives of the competent Directorate of Disciplinary Procedure Control, in accordance with Article 20 of Governor’s Decision 11699/2020 on the organisational structure of the NTA, include the exercise of the responsibilities arising from Law 4622/2019 and in particular from the provisions of:

- Article 99(3) to (5), according to which an objection may be submitted against any decision of the disciplinary bodies of the entities referred to in Article 83(1) and an appeal may be lodged before the Council of State as well as before the Administrative Court of Appeal in conformity with the provisions in force.
- Articles 83(2) and 99(1) and (2) on the monitoring of disciplinary proceedings and criminal cases in the entities referred to in Article 83(1), with the exception of the military personnel of the armed forces.

## A. Disciplinary decisions - legal remedies

In 2020, one thousand three hundred and seventy-two (1.372) disciplinary decisions that had been notified to the NTA were examined.

The Governor of the Authority submitted thirty-one (31) objections to the Disciplinary Boards of First and Second Instance and lodged three (3) appeals before the Council of State requesting the final dismissal of the prosecuted employees.

The exercise of legal remedies in 2020 and in previous years resulted in an increase of penalty in twenty-five (25) cases and in two (2) of them a final dismissal was imposed.

In the context of monitoring the compliance of the administration and the competent disciplinary bodies with the decisions of the Administrative Courts, issued following an appeal by the Authority, and the implementation of the Disciplinary Boards decisions, issued following an objection by the NTA, and after the investigation of disciplinary cases brought to the attention of the Authority (a total of 228 documents), two (2) audit orders were issued to call to account the disciplinary bodies and the Heads of organisational units who failed to comply with the provisions of the relevant disciplinary law on disciplinary proceedings and punishment of their employees.

## B. Monitoring disciplinary procedures - criminal cases

In the context of the disciplinary procedures, two thousand nine hundred and ninety-two (2.992) documents (summons to a plea, referrals to Disciplinary Boards, criminal prosecutions, criminal decisions, judicial council decisions, suspension decisions etc.) were assessed.

For the purpose of monitoring and controlling the criminal cases and disciplinary procedures, as well as the administrative measures resulting therefrom, a major audit trigger is the notification to the NTA of criminal prosecutions against employees and officials of the entities audited by the Authority. In this framework, and in particular in the last four months of 2020, during which the Directorate of Disciplinary Procedure Control operates, one hundred and sixty-seven (167) cases were investigated concerning the disciplinary control of employees and the imposition of any administrative measures.

Two (2) audit orders were issued as part of the monitoring and control of disciplinary procedures, for failure to comply with the relevant provisions on the disciplinary control of employees, as well as eighteen (18) investigations (on seven (7) teachers, one (1) uniformed officer, four (4) municipal employees, three (3) regional employees and three (3) employees assigned elsewhere), as regards the legality of the disciplinary procedure and the proper application of the regulatory framework.

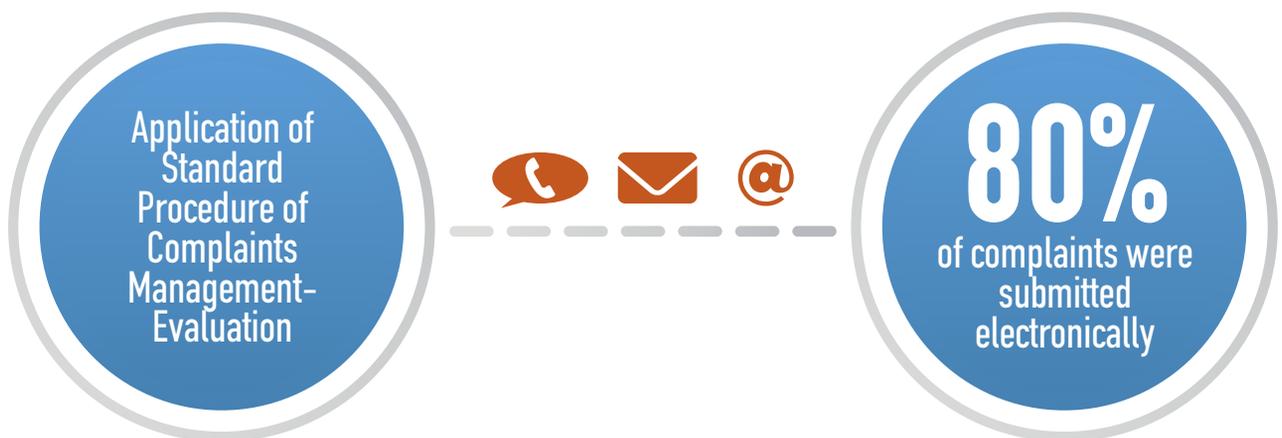
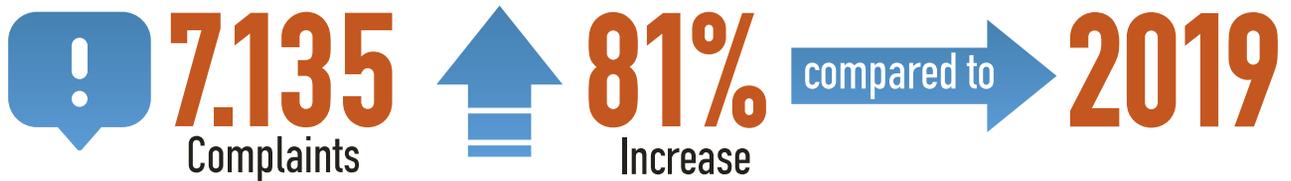
## C. Preliminary investigation work

Following prosecutorial orders, fifteen (15) preliminary investigations were carried out by Inspectors-Auditors of the NTA acting in their capacity of special investigating officers.

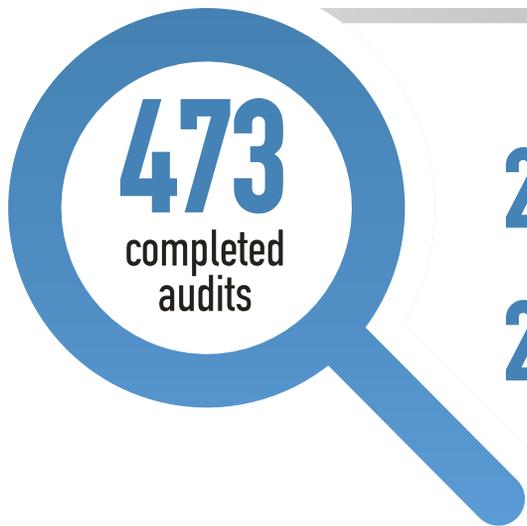
It should be noted that seven (7) of the above fifteen (15) prosecutorial orders come from the Prosecutor of Corruption Crimes.

## 2.1.5. Audit

### Highlights



Complainants are informed of the outcome of their complaint by email using the following e-mail address: [enimerosipoliton@aead.gr](mailto:enimerosipoliton@aead.gr)



**2020** for the first time

**20%** of audits were based on the Risk Analysis Method piloted in the NTA



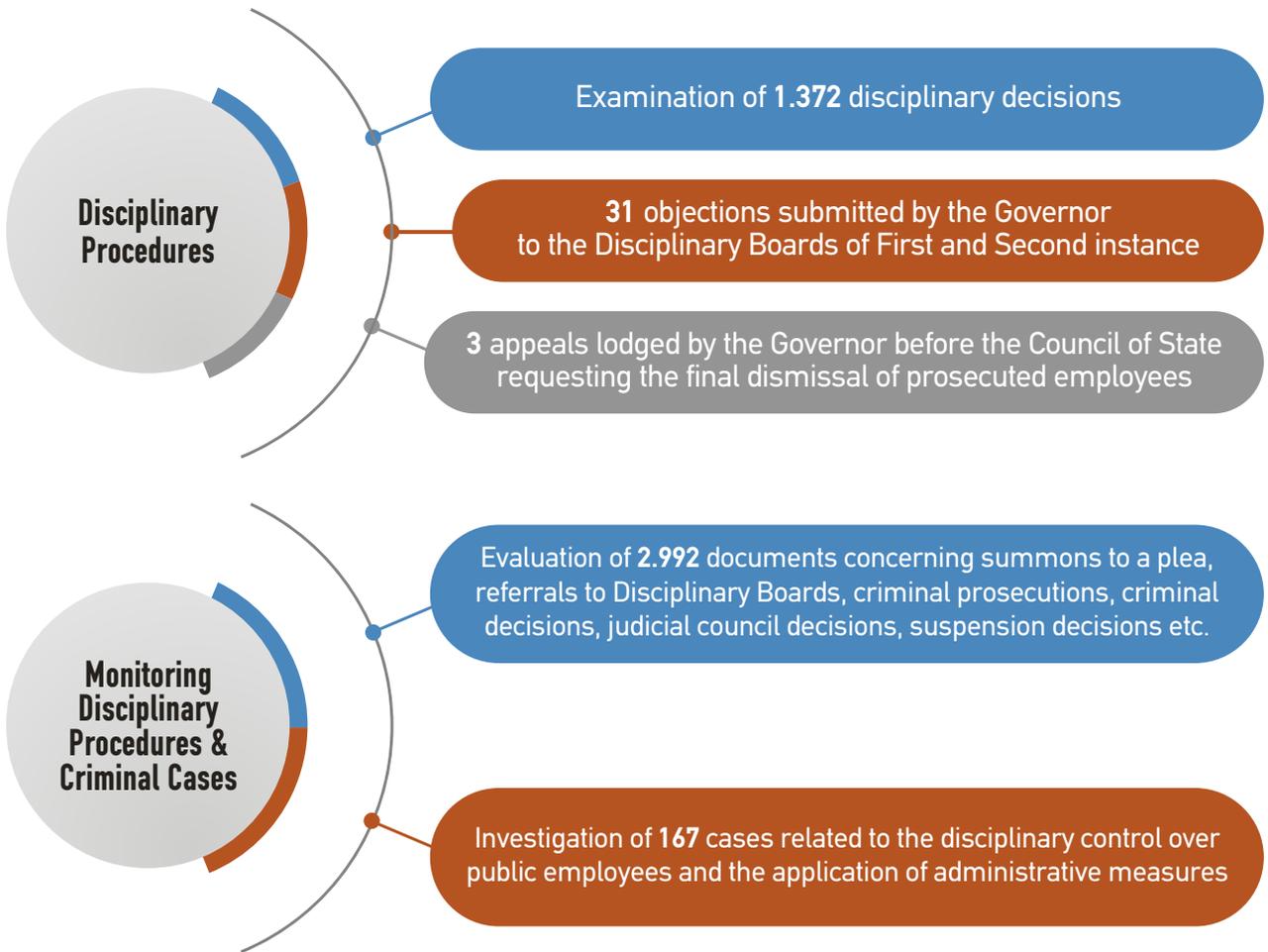
of cases with indications for disciplinary and/or criminal liability of the administration bodies

individuals subject to disciplinary investigation



completed asset declaration audits



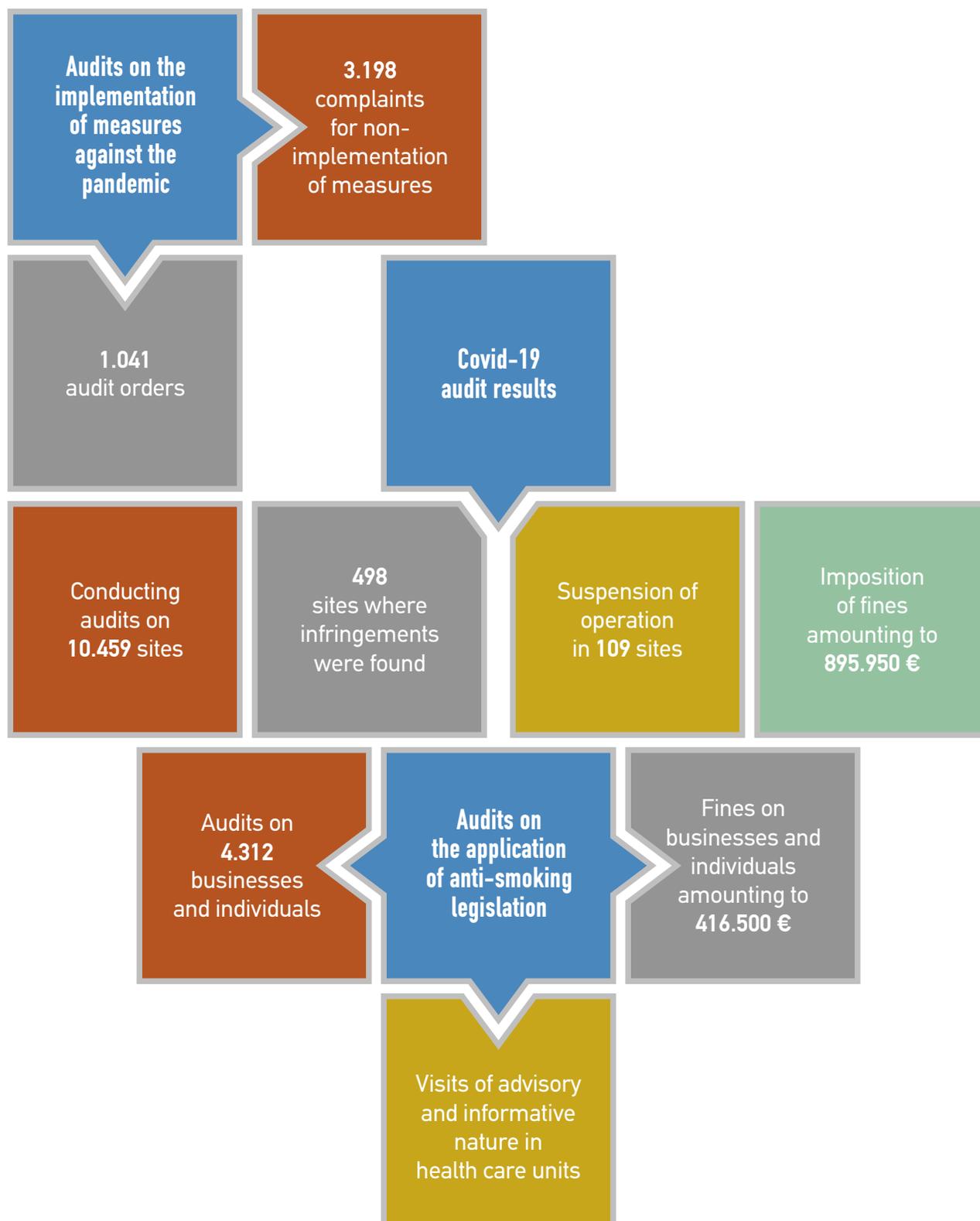


**15** preliminary investigations

## Optimisation of the Operational Functioning of the Inspections and Audits Unit



## Audits to protect public health



## 2.1.6. National Coordinating Body for Audit and Accountability (ESOEL)

The National Coordinating Body for Audit and Accountability (ESOEL) was established by Article 103 of Law 4622/2019 (Government Gazette, Series I, No 133) and operates as a collective body.

All inspection, audit and anti-corruption bodies and services which are not part of the Authority participate in the plenary session of ESOEL by decision of the Governor, in accordance with the provisions of Article 103(3) of Law 4622/2019.

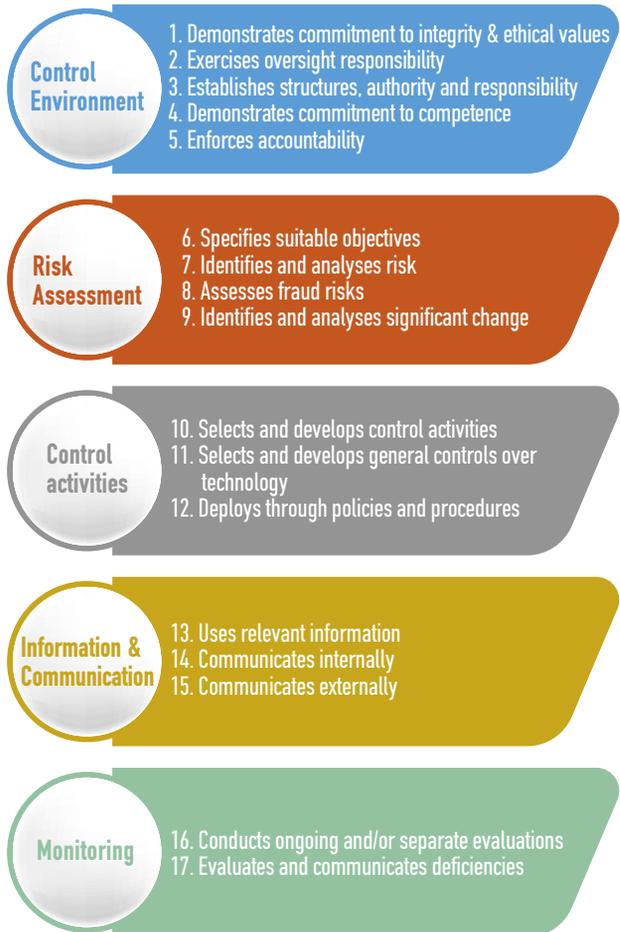
The operation and the exercise of the responsibilities of ESOEL are regulated by its Internal Operating Regulation. An internal ESOEL Network has been created on the Authority's website for the communication between the members of the Body and their direct and more effective cooperation at the level of joint actions and initiatives.

## 2.2. Strengthening Integrity and Accountability

### 2.2.1. Development and Implementation of the Internal Control System in the Greek Public Administration

As part of its mission, the NTA is responsible for the development of the institutional, organisational and operational framework of the National Internal Control System, in cooperation with the Ministries responsible for public administration and financial management.

#### THE 5 PILLARS AND 17 PRINCIPLES OF THE INTERNAL CONTROL SYSTEM



Source: Committee of Sponsoring Organizations of the Treadway Commission, 2013

## 2.2.2. Asset Declarations

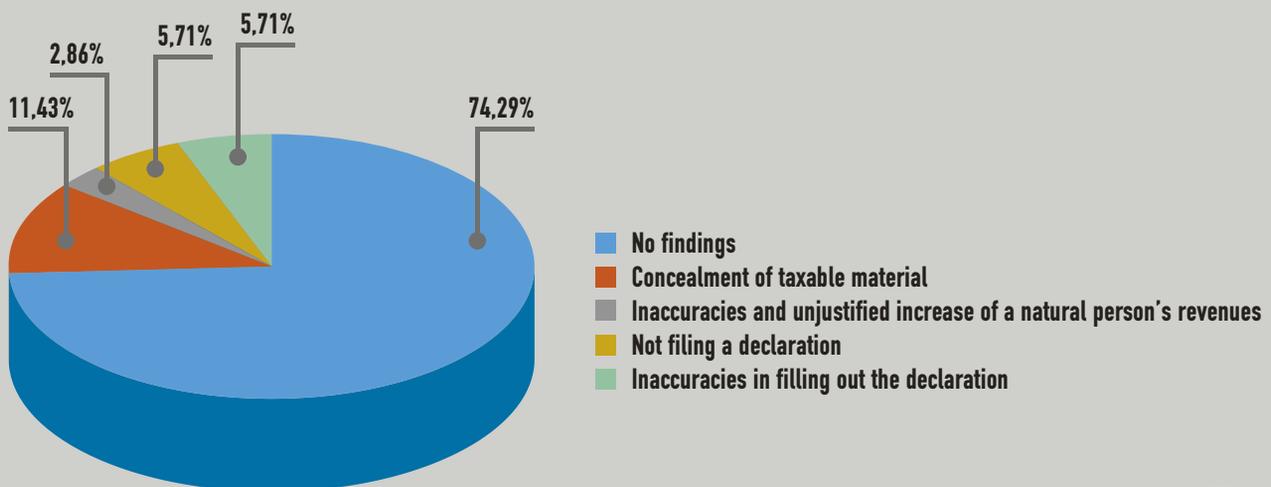
### A. Persons liable to file a 2020 annual declaration of assets and financial interests

Based on the annual statements referred to in Article 1(3) of Law 3213/2003, as in force, thirteen thousand seven hundred and fifty-eight (13.758) persons are liable to file a 2020 annual declaration of assets and financial interests (tax year 2019). The data in the annual statements were entered electronically in the single web application by the competent services of the bodies that notified the declarants falling within the responsibility of the Authority. According to the provisions of the above law, the deadline for filing the 2020 annual declarations of assets and financial interests expired on 30.11.2020. Article 59 of Law 4753/2020 granted an extension of the filing deadline until 28.02.2021, as well as a further extension until 31.03.2021.

### B. Audit of Declarations of Assets and Financial Interests

In addition to the fulfilment of the obligation to file a declaration or not, the audit consists in determining whether the content of the declaration is true and/or verifying whether the acquisition of new assets or the increase in existing assets is justified by the amount of all types of revenue (from obvious sources), together with the subsistence expenses of the declarants.

In 2020, the audit was completed on thirty-five (35) orders, the findings of which are presented below:



Source: data generated and maintained by the NTA

The above orders were sent to the competent Public Prosecutor's Office so that the actions provided for by law are followed, except for the last category of findings of which the competent Public Financial Service of the Independent Authority for Public Revenue (IAPR) was notified.

## C. Development of Regulations, Methodologies and Standards

1. On 13.12.2019, a Memorandum of Understanding was signed between the four oversight bodies responsible for the verification of asset declarations referred to in Article 3 of Law 3213/2003 on the drafting of a Single Regulation of Asset Declaration Audit Procedures for all oversight bodies, in accordance with the provisions of Law 3213/2003, as in force.

To this end, a working group has been set up with representatives of these bodies. The working group meetings recorded each body's audit methodology to date, sought a single framework of procedures to be followed by the auditors, and identified the thematic sections of the Single Regulation of Asset Declaration Audit Procedures, which was issued by joint decision of the President of the Hellenic Parliament and the Ministers for Finance and Justice.

2. Risk analysis criteria were developed in 2020 for audits on declarations of assets, which were approved by the Governor of the NTA and are confidential. The audit process will now be based on risk analysis criteria, which will lead to a sample of asset declarations that are more likely to be untrue, suspect and have a higher potential for delinquency, increasing its effectiveness.
3. A Handbook of Asset Declaration Audit Procedures has been prepared in order to adapt the audits carried out by the competent Assets Declaration Audit Department (Regular Audits) of the General Directorate for Integrity and Accountability to the Single Regulation of Asset Declaration Audit Procedures of the oversight bodies referred to in Law 3213/2003. This handbook includes the audit methodology and is expected to be approved by the Management of the NTA in 2021.

## D. Digital Upgrade and E-Services Tools

The upgrade of the user interface of the electronic application e-Pothen ([www.pothen.gr](http://www.pothen.gr)) has been completed and a tender has been launched for the maintenance and support of the integrated information system. The relevant contract was signed between the NTA and the contracting company on 31.07.2020.

The General Secretariat of Information Systems for Public Administration of the Ministry of Digital Governance, as the operator of the single web application e-Pothen, is responsible for supporting this integrated information system.

## E. Actions in Cooperation with Asset Declaration Oversight Bodies

In cooperation with the other oversight bodies responsible for the verification of asset declarations referred to in Article 3 of Law 3213/2003, the NTA has set up a single upgraded call centre to serve/facilitate all declarants. During the year 2020, training seminars were organised for the staff of the Helpdesk for Declarants, in which representatives of all oversight bodies under Law 3213/2003 participated, and at the same time the questions/answers database of the Helpdesk was enriched.

## 2.2.3. Fight Against Fraud to the EU's Financial Interests (AFCOS)

By Article 82(5) of its founding law, the Authority was designated as the Greek Anti-Fraud Coordination Service (AFCOS), in cooperation with the Financial and Economic Crime Unit (SDOE), to the extent of its responsibilities. In 2020, the NTA/AFCOS implemented the following actions/activities:

### A. Coordination and Monitoring of the PIF Report

The European Commission prepares each year, in accordance with Article 325 of the Treaty on the Functioning of the European Union, a report on the protection of the EU's financial interests (PIF Report). To this end, it sends all Member States a questionnaire on the most important measures (legislative, administrative, organisational or operational) taken by each EU Member State in the areas of revenue and expenditure of the Community budget.

Furthermore, the adoption and implementation of the previous year's recommendations is also examined. In 2020, in cooperation with all the national bodies involved, the NTA/AFCOS submitted the completed Commission questionnaire, notifying the measures taken in 2019, and monitored their inclusion in the report, in constant contact with the relevant EU officials.

### B. Presentation of the Role of the NTA/AFCOS

The NTA/AFCOS presented the newly established Authority to representatives of the NSRF 2014-2020 Operational Programmes, as well as to the competent national anti-fraud bodies, analysing its new role, its new responsibilities and its operational functioning, and highlighting the importance of cooperation and coordinated action in preventing and combating fraud.

### C. National Coordination for Cooperation with the European Anti-Fraud Office (OLAF)

In 2020, 25 actions were taken to facilitate effective cooperation and exchange of information, covering a total of 14 audit cases of the European Anti-Fraud Office (OLAF) with a view to protecting the budget of the European Union.

The NTA/AFCOS:

- coordinated the performance of on-the-spot audits by OLAF, through the submission of requests to support its audit teams, in cooperation with the Financial and Economic Crime Unit (SDOE) to the extent of its responsibilities,
- strengthened OLAF's direct operational cooperation with national bodies in areas of audit interest, given the international constraints caused by the COVID-19 pandemic,
- provided administrative assistance and information to OLAF, following relevant requests, for its most complete information and better preparation on audit cases.

### D. Interinstitutional Cooperation with the Operations Coordination Centre

The NTA/AFCOS participates in the work of the Operations Coordination Centre to address the smuggling of products subject to excise duty, with one representative in the post of Secretary and an additional officer in his service.

In 2020, the Operations Coordination Centre handled a total of thirty-six (36) cases of smuggling of excise goods, out of which nineteen (19) concerned smuggling of tobacco products. In twelve (12) of these tobacco cases, more than 63% of the total, information was exchanged with the European Anti-Fraud Office (OLAF).

## E. Complaints Management

With regard to complaints concerning suspicions of fraud in co-funded projects submitted to the NTA, the Directorate for Complaints Management of the Inspections and Audits Unit is responsible for the evaluation procedure.

The evaluation procedure of these complaints follows the Authority's standard evaluation procedure, whose results are communicated to the NTA/AFCOS. If the complaint falls within the competence of the Authority and is not closed, it is forwarded to the AFCOS Audits Department of the Directorate of Public Works and Transport for further investigation.

During the reference year, the NTA/AFCOS monitored the progress of all the complaints, of which it was aware, concerning programmes/actions co-funded by the EU. In particular, the majority of complaints concern the 2014-2020 programming period; complaints about co-financed projects of previous programming periods were also received.

Of the eighty-three (83) complaints, twenty-six (26) relate to projects co-funded by the European Social Fund (ESF), twenty-four (24) relate to projects co-funded by the European Regional Development Fund (ERDF), five (5) relate to projects co-funded by the Cohesion Fund (CF), four (4) relate to projects co-funded by the European Agricultural Fund for Rural Development (EAFRD) and the European Agricultural Guarantee Fund (EAGF), two (2) relate to projects co-financed by the European Maritime and Fisheries Fund (EMFF), two (2) relate to projects co-funded by the Fund for European Aid to the Most Deprived (FEAD), two (2) relate to projects co-funded by the Asylum, Migration and Integration Fund (AMIF), six (6) concern in other cases, and finally in twelve (12) complaints the Fund is not mentioned.

The selection procedures for beneficiaries and the public procurement sector were the two most common issues of complaints; at the same time complaints about non-compliance with implementation requirements and conflict of interest were also received.

## F. Participation in Bodies and Working Groups at European and National Level

In 2020, the NTA/AFCOS participated in the work of international and European institutions:

### Meetings of the Advisory Committee for the Coordination of Fraud Prevention (COCOLAF)

- COCOLAF Plenary (28 May & 3 December 2020)
- Annual meeting of the OLAF Anti-Fraud Communicators' Network (COCOLAF-OAFCN, 23-24 January 2020)
- Annual meeting of the competent Anti-Fraud Coordination Services in the European Union (COCOLAF - AFCOS Group, 22 October 2020)
- Fraud Prevention Group meeting (COCOLAF - Fraud Prevention Group, 3 December 2020)
- Meetings of the Reporting & Analysis of Fraudulent and other Irregularities Group (COCOLAF - Reporting & Analysis of Fraudulent and other Irregularities Group, 28 April & 4 December 2020)

### Interact-Interreg

- Meeting to exchange experiences and good practices under the Interact-Interreg Programme (21-22 October 2020)

### GAF

The NTA/AFCOS participates in the monthly work of the Working Group on Combating Fraud (GAF) of the Council of the European Union. The NTA/AFCOS participated in a total of 14 GAF sessions/meetings, its main task being to draw up positions on the amendment of the Regulation, to cooperate with competent national bodies on issues relating to the treatment of irregularities against the financial interests of the Union, and, more generally, to support the Permanent Representation of Greece in these matters.

Furthermore, in its capacity as national representative in Operational Programme Monitoring Committees, the AFCOS participated in the meeting of the Monitoring Committee of the Rural Development Programme in 2020.

## 2.3. Raising Awareness

### 2.3.1. Raising Awareness on Fraud and Corruption

Initiatives to raise awareness and inform society on transparency, accountability and the fight against corruption are the third pillar of the operational functioning of the NTA. The aim of these actions is to strengthen peoples' participation in public life and promote a culture of zero tolerance to corruption. In this context the Authority implemented a series of communication and awareness raising activities.

- **Communication activities:** organisation of a teleconference with the Prime Minister, participation in the open public debate on the fight against corruption, organisation of on-line debates and events on corruption and integrity issues, meetings with representatives of stakeholders, organisations and policy makers, participation in conferences, information of the public via newsletters and articles on the web and the press, social and mass media presence.
- **Awareness raising activities:** launch of a National Competition of Student Creativity for Primary and Secondary Education entitled "Integrity leaders of tomorrow", production of educational material for Primary and Secondary Education students.

### 2.3.2. National Platform for Sport Integrity (EPATHLA)

The NTA is one of the five founding members of the National Platform for Sport Integrity (greek acronym EPATHLA = awards), a committee set up in the framework of the implementation of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention). EPATHLA is an ambitious reform in the field of sport, which attempts to effectively and institutionally tackle this global phenomenon of corruption by developing cooperation at national, European and global level.

## 2.4. Coordination of the Implementation of the National Anti-Corruption Action Plan (NACAP)

### 2.4.1. Monitoring and Assessment of Implementation Progress of NACAP 2018-2021

The NTA systematically monitors the implementation of NACAP by regularly reviewing the progress made by means of six-monthly implementation reports, which it publishes on its website, within the framework of the principles of transparency and good administration, and at the same time, in the context of the Enhanced Surveillance Mechanism, regularly informs the European Commission of the extent to which the objectives of the Plan have been achieved.

During 2020, in view of the institutional changes introduced by Law 4622/2019, the NTA updated NACAP 2018-2021 making minor amendments.

The updated NACAP is now structured in 5 parts and includes a total of 147 actions.

**Part 1:** "Sectoral Prevention of Corruption"

**Part 2:** "Integrity across Public Administration and the Judiciary System"

**Part 3:** "Strengthening of Cooperation and Coordination across the Public Sector"

**Part 4:** "Education and Raising Awareness"

**Part 5:** "Organisational Change and Operational Reforms of the National Transparency Authority"

The implementation progress of NACAP for 2020 is satisfactory, despite the challenges posed by the COVID-19 pandemic, that led to the redefinition of NTA's priorities to the direction of the protection of public health. NACAP completion rate rose to 53 % (78 completed actions out of a total of 147), while the majority of actions that have not been completed are linked to ongoing technical assistance projects.

Out of the total of 78 completed actions:

- 29 are linked to Specific Objectives for the Sectoral Prevention of Corruption (Part 1),
- 7 are linked to Specific Objectives for the Promotion of Integrity (Part 2)
- 32 are linked to Specific Objectives for Strengthening Cooperation and Coordination (Part 3)
- 5 are linked to Specific Objectives for Raising Awareness and Educating the public (Part 4)
- 5 are linked to specific Objectives for NTA's Organisational Change/Operational Reform (Part 5).

Among the actions implemented in 2020, the following are of high importance and added value:

- Introduction of a single regulation of audit procedures for all the competent asset declaration oversight bodies (Action 9.1.1).
- Revision of the Criminal Code, which also amended Article 187CC on criminal organisation by abolishing the restrictive reporting of offences, which did not include

corruption offences as a condition for the establishment of a criminal organisation (Action 13.2.4).

- Establishment of the National Coordinating Body for Audit and Accountability (ESOEL) with the task of strengthening coordination and cooperation between bodies and entities fighting corruption and financial crime (Action 13.2.5).
- Launch of a National Competition of Student Creativity for Primary and Secondary Education entitled "Integrity leaders of tomorrow" in an effort to strengthen integrity via the education system (Action 14.1.3).
- Drafting of a Code of Ethics and Good Administrative Behaviour for the Authority's staff and a Code of Professional Ethics of the NTA's Inspectors-Auditors (Action: 15.2.2).
- Drafting of a manual for the Management of Public Prosecutor's Orders (Action: 15.2.3).

With the aim of improving the effectiveness of interventions and strengthening cooperation between the competent bodies, the Authority proceeded in 2020 to the development of an integrated management system for NACAP, introducing standard procedures for its monitoring, evaluation and update. In this context, the following were developed:

1. A manual of procedures to monitor and update NACAP, which describes in detail the steps in the process of monitoring and report of the progress of the individual actions of the Plan, while setting out a timetable for required actions by each party involved.  
The second part of the manual sets out the procedure for adapting NACAP to changing circumstances of the external environment, laying down a number of conditions and actions required to amend one or more elements of the Plan, e.g. add/remove actions, modify the content of an action, update implementation timetables.
2. A NACAP evaluation plan, which describes the procedure and methodology for carrying out:
  - a) an internal implementation evaluation carried out periodically by the NTA and
  - b) an evaluation of the effectiveness of NACAP, which is conducted by an external evaluator. The aim of the procedure is to investigate the factors that have a positive or negative impact on the progress of implementation and

completion of the NACAP actions, as well as to seek, lay down and assess the results of the implementation of the actions per priority area.

3. A monitoring guide to support the implementing bodies, which records the obligations and actions of the implementing bodies in an effort to improve the coordination of the parties involved and to speed up the implementation of the actions.

For all the procedures, standard documents were developed, the most important being the Action/Project Fiche which is a standard document for the inclusion, modification or removal of an action from NACAP. The Action/Project Fiche clearly describes the physical and financial object, the management scheme, the deliverables and the timetable for the implementation of each action, ensuring through sound planning the effective monitoring of progress in its implementation.

## 2.4.2. Design of NACAP

### 2022-2025

In the last quarter of 2020, the process of designing the framework for the 2022-2025 NACAP was launched. The guidelines of the new NACAP reflect the country's strategic priorities and are developed on the basis of the three operational pillars of the NTA, as outlined in its five-year Strategic Plan for 2020-2024. At the heart of the design of the structure and intervention logic of the new NACAP is the systemic approach, focusing on:

- Developing a comprehensive policy-making framework to integrate horizontal and sectoral actions,
- Coherence of intervention and simplification of the design framework by limiting the large number of individual General and Specific Objectives,
- Strengthening the partnership between the NTA and the implementing bodies at all stages of the public policy cycle (design, implementation, monitoring and evaluation/feedback),

- Maximising the impact and added value of the actions, and
- Producing measurable results.

In application of the above, the new NACAP will be structured into three (3) parts:

**Part A:** Investigation - Deterrence - Audit

**Part B:** Prevention - Integrity - Accountability

**Part C:** Information - Publicity - Awareness Raising

Each Part is further specified in four (4) Specific Objectives.

Two major innovations of the new NACAP are:

- a) the introduction of a system of monitoring indicators for mapping the outputs and results of the intervention, and
- b) the provision for a specific procedure for the inclusion of actions through the completion of standard Action/Project Fiches, in which the main characteristics and expected results of each proposed intervention will be laid down.

In 2021, all entities involved will be consulted to specify the actions of the new NACAP, with a view to finalising the Plan at the end of the year.

## 2.5. International Presence

The NTA is represented in the Management Group of the OECD Working Group on Bribery in International Business Transactions, as well as in the Group of States against Corruption.

Throughout the year, the NTA participated via teleconferences in a series of meetings, held at international and European level, the main ones being the 11th session of the Implementation Review Group of the UN Convention against Corruption, the 9th open-ended intergovernmental expert meeting to enhance international cooperation, the 14th session of the Open-ended Intergovernmental Working Group on Asset Recovery. These meetings were organised by the United Nations Office on Drugs and Crime (UNODC).

The NTA also participated in the work of the 85th Plenary Meeting of the Council of Europe's Group of States against Corruption, in a session of the OECD Working Party of Senior Public Integrity Officials (SPIO), as well as in the meetings of the European Commission's special working group on the transposition of Directive 2019/1937 on the protection of persons who report breaches of Union law.

Finally, the NTA participates actively in international anti-corruption networks, such as the Council of Europe's Network of Corruption Prevention Authorities (NCPA), as well as the Network of European Integrity and Whistleblowing Authorities (NEIWA).

### **OECD Working Party of Senior Public Integrity Officials (SPIO OECD)**

The NTA participates in the Working Party of Senior Public Integrity Officials, which focuses its work on the implementation of the OECD Recommendation on public integrity and the development of a set of actions and tools for its effective implementation by the Member States.

Key tools for the implementation of the Recommendation are the Integrity Handbook, which was prepared by the OECD with the assistance of the representatives of the Member States and was completed in 2020, and a set of standard indicators to measure and assess the preparedness and resilience of the public integrity system at national level. The assessment is not intended to classify countries, but to provide policymakers with an international perspective and a reliable methodology to measure the effectiveness of their systems. The assessment of the above elements requires the collection of data from a wide range of public authorities. The data are sent gradually by indicator. In this context, the Authority submitted in 2020 data to assess the first indicator "Quality of Strategic Framework for Integrity".



# 3 OPERATIONAL PLANNING FOR 2021

The NTA's operational planning for 2021 extends to all three key pillars of action covering all of the Authority's Strategic Objectives and summarises the key projects and actions it plans to implement. It includes interventions in the following areas:

- **Optimisation of Audit Execution, Monitoring and Planning**
- **Promotion of Integrity and Accountability**
- **Awareness Raising and Communication**
- **National Anti-Corruption Action Plan (NACAP)**
- **Organisational Change Management**

The entire annual report (Greek version) has been posted on the official website of the NTA ([www.aead.gr](http://www.aead.gr)) at the following link:  
[https://aead.gr/images/essays/Ekthesi\\_Apologismou\\_etous\\_2020\\_online.pdf](https://aead.gr/images/essays/Ekthesi_Apologismou_etous_2020_online.pdf)  
 and is structured as follows:

- INTRODUCTION
- SUMMARY REPORT 2020
- 1. ORGANISATION AND OPERATION**
  - 1.1. Institutional Framework
  - 1.2. Organisational Structure and Management Bodies
  - 1.3. Key Data on Human Resources
  - 1.4. Harnessing and Developing Human Resources
  - 1.5. Financial Management
  - 1.6. Digital Transformation
  - 1.7. Personal Data Protection
  - 1.8. Optimisation of Operational and Administrative Functioning
    - 1.8.1 Standardisation of Operational Procedures
      - 1.8.1.1. Administrative Procedures and Standards
      - 1.8.1.2. Security Policies
    - 1.8.2. Co-funded Technical Assistance Projects
      - 1.8.2.1. Design of a Risk Based Audit Plan
      - 1.8.2.2. Behaviour Insight Project
      - 1.8.2.3. Inclusion of Projects in the Operational Programme “Public Sector Reform”
        - 1.9. Strategic Plan and Pilot Operational Goal Setting
          - 1.9.1. Strategic Plan
          - 1.9.2. Pilot Operational Goal Setting
- 2. REPORT OF MAIN ACTIVITIES**
  - 2.1. Report of Inspections & Audits Unit Work
    - 2.1.1. Mission and Organisational Structure of the Inspections and Audits Unit
    - 2.1.2. Optimisation of the Operational Functioning of the Inspections and Audits Unit
    - 2.1.3. Overview of audit work
      - 2.1.3.1. Complaints
      - 2.1.3.2. Audit Orders
      - 2.1.3.3. Asset Declaration Audit for Public Officials
      - 2.1.3.4. Disciplinary Competencies of the NTA
    - 2.1.4. Significant Audits
    - 2.1.5. Contribution of the NTA to the Protection of Public Health
    - 2.1.6. National Coordinating Body for Audit and Accountability (ESOEL)
      - Strengthening Integrity and Accountability
  - 2.2. National Integrity System
    - 2.2.1.1. Pillars of the National Integrity System

- 2.2.1.2. Other Actions for Integrity
- 2.2.1.3. Development and Implementation of the Internal Control System in the Greek Public Administration
- 2.2.2. Asset Declarations
- 2.2.3. Specific Sectoral Strategies
- 2.2.4. Fight Against Fraud to the EU's Financial Interests
- 2.3. Raising Awareness**
  - 2.3.1. Raising Awareness on Fraud and Corruption
  - 2.3.2. Communication Actions
  - 2.3.3. Awareness Raising Actions
  - 2.3.4. National Platform for Sport Integrity (EPATHLA)
- 2.4. Coordination of the Implementation of the National Anti-Corruption Action Plan (NACAP)
  - 2.4.1. Monitoring and Assessment of the Implementation Progress of NACAP 2018-2021
  - 2.4.2. Evaluation of NACAP 2018-2021
  - 2.4.3. Design of NACAP 2022-2025
- 2.5. International Presence
  - 2.5.1. Participation in National and International Anti-Fraud and Anti-Corruption Networks
  - 2.5.2. Participation of the NTA in Country Assessments by International and European Organisations
- 3. OPERATIONAL PLANNING FOR 2021**
  - Introductory Remarks
  - Upgrading the Audit Work
    - 3.1. Conduct of audits
    - 3.2. Application for the Management-Evaluation of Complaints
    - 3.3. Application for Monitoring Complaints Investigations
    - 3.4. Application for Monitoring the Audit Work
    - 3.5. Application for Monitoring Proposals-Recommendations of Audit
    - 3.6. Platform for Monitoring the Progress of the Disciplinary Procedure
    - 3.7. Risk Based Audit Plan
    - 3.8. Application for Extracting Statistical Data on Disciplinary Cases
    - 3.9. Memorandum of Cooperation on Disciplinary Justice in Higher Education Institutions
  - Strengthening Integrity and Accountability
    - 3.10. National Integrity System
    - 3.11. Annual Plan of Asset Declaration Audits
    - 3.12. National Anti-Fraud Network
    - 3.13. Handbook for Drafting Sectoral Anti-Corruption Strategies
    - 3.14. Internal Control System
    - 3.15. Integrity Consultant
    - 3.16. Memorandum of Cooperation with the Ministry of Education and Religious Affairs
    - 3.17. EEA Grants Funded Projects
      - Participation of Civil Society in the Fight Against Corruption
    - 3.18. Strategic Communication Plan and Publicity Actions
    - 3.19. Behavioural Analysis
      - National Anti-Corruption Action Plan

- 3.20. Evaluation of NACAP
- 3.21. Design and Preparation of NACAP 2022-2025
- 3.22. Performing the External Evaluation of NACAP 2018-2021  
Organisational Change Management
- 3.23. Operational Goal Setting for 2021
- 3.24. Digitalisation of Leave Granting Procedure
- 3.25. Asynchronous Education Platform
- 3.26. Staff Training
- 3.27. Application for Monitoring the Authority's Projects
- 3.28. Document Management System
- 3.29. Personal Data Protection
- 3.30. Development of Joint Actions with the Harokopio University of Athens
- 3.31. Operation of the Directorate for Internal Audit and Investigations
- 3.32. Inclusion of New Projects in NSRF 2014-2020
- 3.33. Submission of Proposal for Funding from the Recovery Fund
- 3.34. Planning of ESOEL's Action



**AUDIT**

**ACCOUNTABILITY**

**INTEGRITY**

**TRANSPARENCY**







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