



HELLENIC REPUBLIC

20 21

ANNUAL
REPORT



NATIONAL TRANSPARENCY AUTHORITY

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ACRONYMS + ABBREVIATIONS

AFCOS	Anti-Fraud Coordination Service
CATONE	Cooperation Agreements and Training on Objectives and New Experiences
COCOLAF	Advisory Committee for the Coordination of Fraud Prevention
COSO	Committee of Sponsoring Organizations of the Treadway Commission
CoSP	Conference of States Parties
CPI	Corruption Perceptions Index
EEA	European Economic Area
EFET	Hellenic Food Authority
EFKA	National Social Security Fund
GAF	Working Group on Combating Fraud
GRECO	Group of States Against Corruption
HATVP	Haute Autorité pour la Transparence de la Vie Publique
IAACA	International Association of Anti-Corruption Authorities
IC-IF	Internal Control - Integrated Framework
INEP	Training Institute
LEGA	Law Enforcement and Government Alliance
NCPA	Network of Corruption Prevention Authorities
NTA	National Transparency Authority
OECD	Organisation for Economic Co-operation and Development
OLAF	European Anti-Fraud Office
OPEKEPE	Payment and Control Agency for Guidance and Guarantee Community Aid
RPA	Record of Processing Activities
SDOE	Special Secretariat for Financial and Economic Crime Unit
SPIO	Senior Public Integrity Officials
SRSP	Structural Reform Support Programme
TIF	Thessaloniki International Fair
UNCAC	United Nations Convention Against Corruption
UNGASS	United Nations General Assembly Special Session
UNODC	United Nations Office on Drugs and Crime

Governor's Message



In 2021, with the pandemic still ongoing, the National Transparency Authority remained committed to its mission to carry out effective audit missions, develop targeted prevention and integrity policies, and implement well-designed citizen awareness actions in the fight against maladministration and corruption. Despite the adverse conditions imposed by the health crisis, we made the best out of our employees, developing and providing in-house innovative digital solutions and services.

With our point of reference being the consolidation of the organisational change that was carried out with the establishment of the Authority, we have been able to adequately and successfully manage the new auditing tools put in place for the standardisation and modernisation of our operational methods. The development and proper use of these tools have led to a significant time-reduction in assessing complaints and to the timely completion of the auditing procedure, with a significant positive impact on addressing the weaknesses of the past.

As in 2020, the NTA was actively involved in the state's efforts to tackle the pandemic and protect public health, by carrying out intensive compliance audits, sharing standard tools and coordinating joint missions, thus contributing decisively to avoiding the spread of SARS-CoV-2.

In addition, the implementation of the National Anti-Corruption Action Plan (NACAP) 2018-2021 was completed and the first external evaluation of its effectiveness was carried out with the aim of identifying opportunities to improve the planning, implementation, and monitoring of the actions included in the national strategy. At the same time, with systematic effort and in cooperation with more than twenty-five bodies, the NTA designed and prepared the NACAP 2022-2025, which was adopted by the Council of Ministers.

The presence of the NTA at international level was equally important, with our country taking over, for the first time, the Presidency of the International Network of Corruption Prevention Authorities (NCPA) of the Council of Europe. The Authority also participated in international projects and meetings, actively present at the Conference of the States Parties to the UN Convention against Corruption (CoSP-UNCAC), the Working Party of Senior Public Integrity Officials (SPIO) and the OECD Global Anti-Corruption & Integrity Forum. The continuous cooperation with foreign authorities and international organisations highlights the multi-level work of the NTA, which has remarkable international recognition by institutions and organisations active in the field of prevention and anti-corruption.

None of the above would have been possible without the tireless efforts of our officials, who with methodical and intensive work highlighted the work and actions of the Authority. With the aim of maximising efficiency, we proceeded to the staffing of the Inspections and Audits Unit through a demanding and structured selection procedure that ensured transparency and meritocracy.

In 2022, we will continue the hard work, building on the experience and scientific training of our staff in order to effectively respond to the challenge of recovering from the impacts of the pandemic by using EU and national resources in line with transparency and public accountability.

NTA Governor (2019-2022)

Angelos Binis

Interim Governor's Message



In 2021, despite the difficult conditions imposed by the health crisis in all areas of social and professional activity, the officials of the National Transparency Authority responded to their increased tasks in a consistent and professional manner, highlighting the multi-level work of the National Transparency Authority.

As Head of the Inspections and Audits Unit since the establishment of the Authority and NTA Interim Governor since July 2022, I commit to continue our work with collegiality and dedication on all three main pillars of action of the Authority: Audit - Prevention - Awareness-Raising, with the aim of enhancing transparency as well as the audit and accountability mechanisms in the Public Administration.

NTA Interim Governor (2022)

Alexandra Rogkakou

Chairman's Message



2021 has been a particularly difficult year with the coronavirus pandemic galloping ahead and our daily lives evolving in unprecedented social and economic conditions.

At the same time, the Greek state and its officials were faced with another pandemic, the pandemic of corruption, that may not have a direct impact on health but is just as toxic as the COVID-19 pandemic and threatens the stability of democratic institutions.

In an effort to curb corruption, the National Transparency Authority continues its work, moving steadily forward, looking to the future with confidence and anticipating the successful outcome of the efforts made by its officials to enhance transparency, prevent, deter, detect and address the phenomena and acts of fraud and corruption in the actions of public and private bodies and organisations.

Preventing and raising society's awareness of the risks of corruption in the era of the pandemic (COVID-19) is a challenge for the NTA not only during but also in the post-pandemic era.

According to a public opinion survey carried out by the Authority, citizens perceive the problem of corruption in Greece as very important. The same survey identifies the NTA as an institution that citizens trust to deal with corruption incidents, which adds value to its work.

As Chairman of the Management Board of the NTA, I would like to express my sincere and warm congratulations to the Authority's officials for their work so far. I would also like to thank the members of the Management Board, the Deputy President Vassilios Kougeas, Maria Gavouneli, Nikos Douladiris and Andreas Papastamou for their contribution to the great effort we are making and wish for 2022 the realisation of the vision of the NTA.

For my part, I am committed to working closely with the members of the Management Board, the Governor and the officials of the NTA, so that we can all achieve the goals we have set and prove equal to the expectations of the society.

The Chairman of the Management Board
Menelaos Tsouplakis



Introduction

The annual report of the National Transparency Authority for 2021 is the third report since the establishment and operation of the Authority and presents all the activities carried out during the reporting year.

The report is provided for in article 85 par. 5 of Law 4622/2019 and is a key tool for accountability and control of the Authority's action. It is submitted by the Governor of the Authority, upon 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 the relevant edition of the National Printing House and posted on the Authority's website.

The first section of the report lays down the main changes in the Authority's institutional framework, the work of the Management Board and the Ethics Committee, as well as key data on human resources and financial management. It also describes the most important actions related to digital transformation, the co-funded technical assistance projects and the operational goal-setting of the Authority.

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

- Audit work and operational functioning of ESOEL
- Strengthening integrity and accountability
- Raising Awareness

The same section also describes the progress in the implementation of the National Anti-Corruption Action Plan (NACAP) and the representation of the country in international, European and national anti-fraud and anti-corruption networks.

The third section presents the planning of the main projects and actions for the year 2022 across the whole range of activities of the NTA.

1

ORGANISATION & OPERATION

1.1. Changes to the NTA's institutional framework

The National Transparency Authority (NTA) was established by the provisions of Law 4622/2019 (Government Gazette, Series I, No 133), as amended by laws 4635/2019, 4637/2019 and 4829/2021, and exercises the competences provided for in Article 83 of its founding law, as well as those conferred upon it by newer legislative provisions. More specifically:

- Article 62 of Law 4727/2020 (Government Gazette, Series I, No 184) provides for the lodging of an administrative appeal before the NTA against a decision rejecting applications for the provision of documents for further use on which the Authority must decide within a specified time limit.
- By the provisions of Part A and Part B of Law 4795/2021 (Government Gazette, Series I, No 62) the NTA is designated as the competent body for coordination, monitoring and evaluation of the functioning of the Internal Audit Units as well as the coordination of the Integrity Advisors Network.
- Article 24 of Law 4807/2021 (Government Gazette, Series I, No 96) provides for the maintenance in the NTA of an electronic database monitoring disciplinary cases.
- Article 67 of Law 4811/2021 (Government Gazette, Series I, No 108) provides to the Inspectors-Auditors of the NTA the possibility to participate in certified training programmes in the field of applied or public auditing-accounting and internal audit.

- With the provisions of Part A of Law 4829/2021 (Government Gazette, Series I, No 166) the NTA is designated as the competent authority for the supervision of the Transparency Register (Supervisory Authority) and compliance with the rules of this institutional framework. In addition, Law 4829/2021 introduced substantial changes in the Authority's staffing process, since with the provisions of Article 20(8) the exceptional provisions on the secondment or transfer of staff to the NTA referred to in Article 96(7) of Law 4622/2019 have been repealed.

1.2. The Ethics Committee

In 2021, the Committee examined three applications for authorisation to pursue a professional activity related to the activity of the public body to which the applicants had been appointed that could result in a situation of conflict of interests. Among these cases there was one that resulted in the imposition of the post-employment term restriction; more specifically the Ethics Committee decided that the applicant shall refrain from concluding any contract between the company that he intended to set up and the public bodies having been until recently under his supervision.

In cases of non-compliance with the provisions of law 4622/2019 on ineligibilities, incompatibilities and rules for the avoidance of conflicts of interest, no violation has been identified so far and, therefore, the Ethics Committee did not address any proposal to the Governor of the Authority to impose sanctions.

1.3. Internal Audit in the NTA

According to Law 4795/2021, the NTA is, together with the Ministry of Finance and the Court of Auditors, responsible for the coordination, monitoring and evaluation of the operation of the Internal Audit Units in the public sector.

In addition, according to its founding Law (Article 83 of law 4622/2019) the Authority is responsible for the following:

- the development of the institutional, organisational and operational framework for the National Internal Control System and the internal audit and risk management functions, in cooperation with the competent ministries for public administration and financial management,
- the design and development of internal audit standards, methodologies and tools,
- the coordination and support of the operation and audit actions of the Internal Audit Units.

In this context, the Directorate for Internal Audit and Investigations of the Authority is a critical building block of the Internal Control System which runs through the entire range of the Authority's functions and systems.

In order to develop an efficient and effective internal audit function, able to provide independent, objective, affirmative, and consulting services designed to add value and improve the Authority's functions, the following actions were implemented in 2021:

1. Rules of procedure of the Directorate for Internal Audit and Investigations
2. Provision of affirmative action
3. Provision of consultation work
4. Draft programme of the audit missions of the NTA's Directorate for Internal Audit and Investigations for the year 2022

1.4. Key Data on Human Resources & Budget Allocation

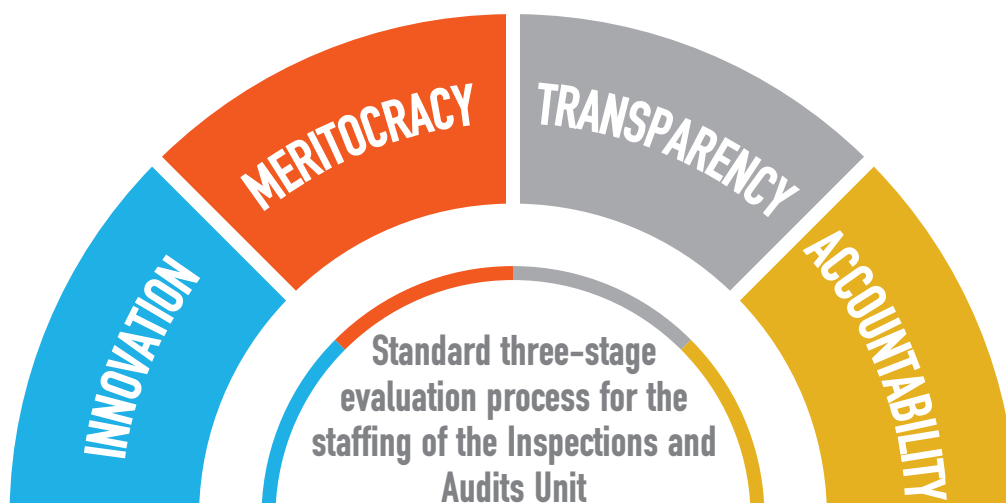
Human Resources



5 recruitment announcements

Completion of the digital organisation chart

Total number of posts provided by law 518 (Vacant posts 134 - Occupied posts 384)



The evaluation process aiming at filling fifty-five (55) posts of Inspectors-Auditors by secondment, was implemented for the first time in the NTA and comprised the following stages:

- Assessment of candidates' skills and qualifications - At the first stage applications were assessed and unqualified candidates were rejected.
- Practical test - Those invited to participate in the second stage were evaluated according to their ability to develop a text on an issue related to the assessment-management of a complaint submitted to the NTA and their Microsoft Office skills (e.g. Word, Excel, Power Point).
- Structured interview - At the final stage the candidates were invited to a structured in person or remote interview.

The competition was conducted electronically via a platform developed in-house both for the submission of applications and for the practical test of the 2nd evaluation stage.

Working Groups - Committees

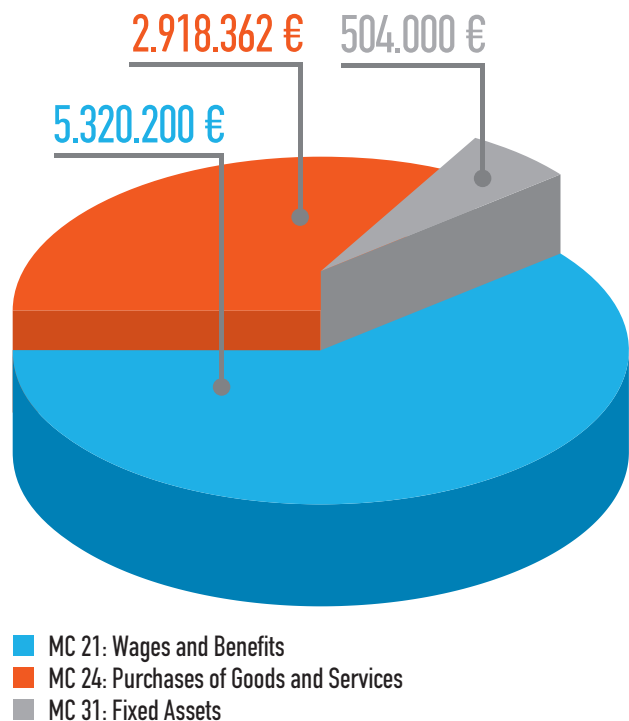
In 2021, officials from all the NTA's departments participated in 46 working groups and committees. The work of the working groups was the production of the Authority's regulations, codes and policies, while the committees aimed at the conduct of tenders, the examination of objections and appeals, the receipt of goods and services, the monitoring of projects and the selection of staff. A number of officials also participated in the working groups of other institutions in order to share know-how for effectively tackling and managing phenomena of corruption and lack of transparency.

COMMITTEES - WORKING GROUPS

DESCRIPTION	NUMBER	MEMBERS
WORKING GROUPS		
NTA WORKING GROUPS	11	44
PARTICIPATION IN THE WORKING GROUPS OF OTHER INSTITUTIONS	9	19
DESIGNATION OF PROJECT MANAGERS	9	42
PROCUREMENT COMMITTEES		
CONDUCT OF TENDERS AND EVALUATION OF OFFERS	6	17
EXAMINATION OF OBJECTIONS AND APPEALS	1	3
RECEIPT OF GOODS & SERVICES AND PROJECT MONITORING	14	47
STAFF SELECTION COMMITTEES		
STAFFING BY SECONDMENT	5	13

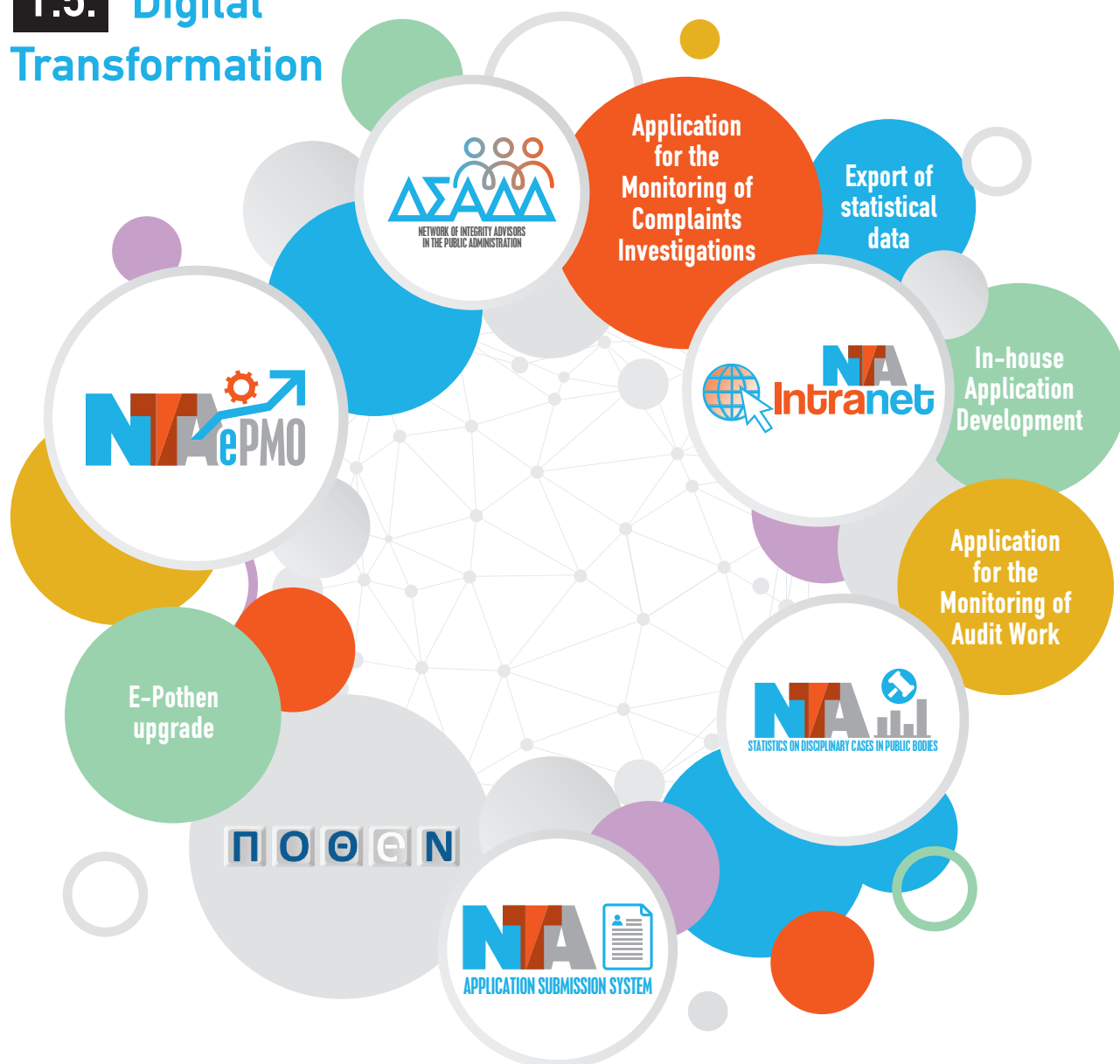
Source: data generated and maintained by the NTA

2021 Budget Allocation



Source: data generated and maintained by the NTA

1.5. Digital Transformation



1.6. Personal Data Protection

In the context of compliance with the requirements of the General Data Protection Regulation (EU) 2016/679 (GDPR) and Law 4624/2019 introducing measures for implementing the Regulation and transposing Directive (EU) 2016/680 into national law, the following actions were taken:

1. Recording of existing workflows, keeping of a record of personal data processing activities (RPA) and preparation of a Gap Analysis to determine the level of compliance of the NTA with the requirements of the legislation in force with regard to personal data protection.
2. Drafting of an action plan and coordination of the work for the implementation of all the necessary organisational and technical measures for compliance by the NTA, in accordance with the conclusions of the above study. Indicatively, the following are mentioned:
 - Drafting and posting on the NTA's Intranet of policies and procedures for the protection of personal data
 - Designation of an Information System and Network Security Officer

- Carrying out web-based information activities on GDPR for the NTA's personnel
 - Implementation of the appropriate organisational and technical measures for the secure processing of (simple and special category) personal data
 - Contract verification for matters falling within the GDPR and relating to suppliers' compliance with the Regulation, the inclusion of special conditions and the incorporation of a special data processing annex for suppliers acting as data processors
 - Participation of the Office of the Personal Data Protection Officer in the development of new e-services and online IT applications
 - Performance of controls to ensure the verification of compliance with the GDPR
3. Preparation of a Data Protection Impact Assessment for personal data processing activities related to:
 - the exercise of disciplinary powers
 - the development of the information system for the monitoring of disciplinary procedures "e-Peitharxika"
 4. Provision of an advisory opinion on questions raised regarding personal data.

1.7. Security Policies

Through the optimisation of information systems and networks, the NTA is constantly improving its operational capacity and is adapting to the demanding conditions of operation.

As in 2020, the Authority remained committed in 2021 to maintaining a high level of information and e-services security. Following a holistic approach to security of digital systems and personal data protection, it adopts new policies and security procedures. In this context, during the reporting year the following security policies were developed:

- Information Classification Policy
- Supplier Management Policy
- USB BitLocker Procedure
- Procedure on the Provision of Digital Equipment to the Staff of the NTA
- Data Subjects Rights Satisfaction Procedure
- Personal Data Breach Management Procedure

1.8. Co-funded Technical Assistance Projects



Launch of 3 sub-projects included in the Operational Programme "Public Sector Reform"

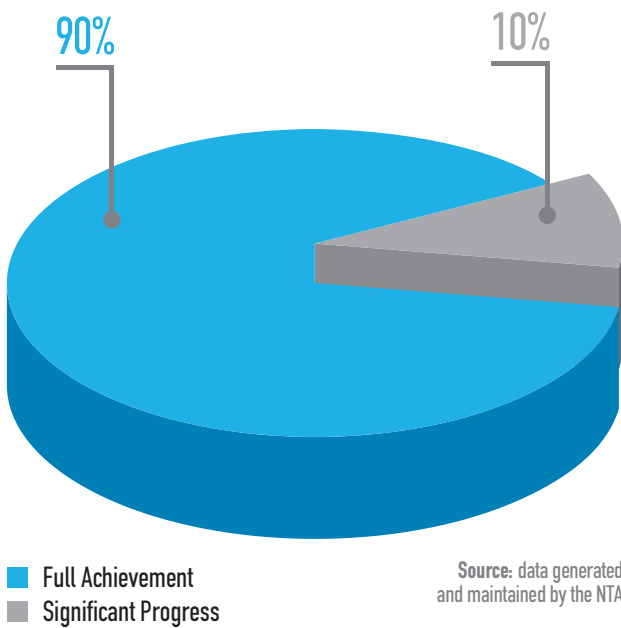


Iceland
Liechtenstein
Norway grants

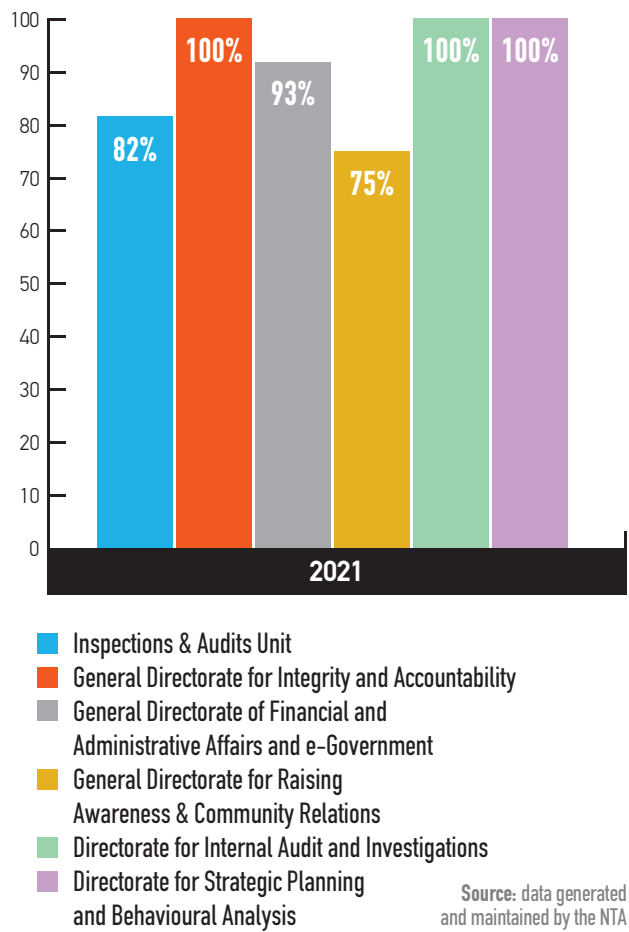
Inclusion in the Programme "Good Governance, Accountable Institutions, Transparency" under EEA Grants (2.000.000 €)

1.9. Operational Goal-Setting

NTA GOAL-SETTING PROGRESS



OVERALL ACHIEVEMENT PERCENTAGE OF OPERATIONAL GOAL-SETTING



2

REPORT OF MAIN ACTIVITIES

2.1. Audit Highlights



5.128

Complaints



2.743

Audit & Investigation Orders



2.479

Completed Reports



Complainants are informed of the outcome of their complaint via the email address enimerosipoliton@aead.gr

607	investigations of complaints
362	completed investigations
378	audit orders (other than those for the protection of public health)
250	systemic audit orders in health service structures & public services
1.440	audit orders related to COVID-19 & anti-smoking legislation
393	audit reports (other than those related to COVID-19 & anti-smoking legislation)
1.878.488 €	charging fines to accounting officers
91	audit reports with indications of disciplinary and/or criminal liability

Asset Declaration Audits

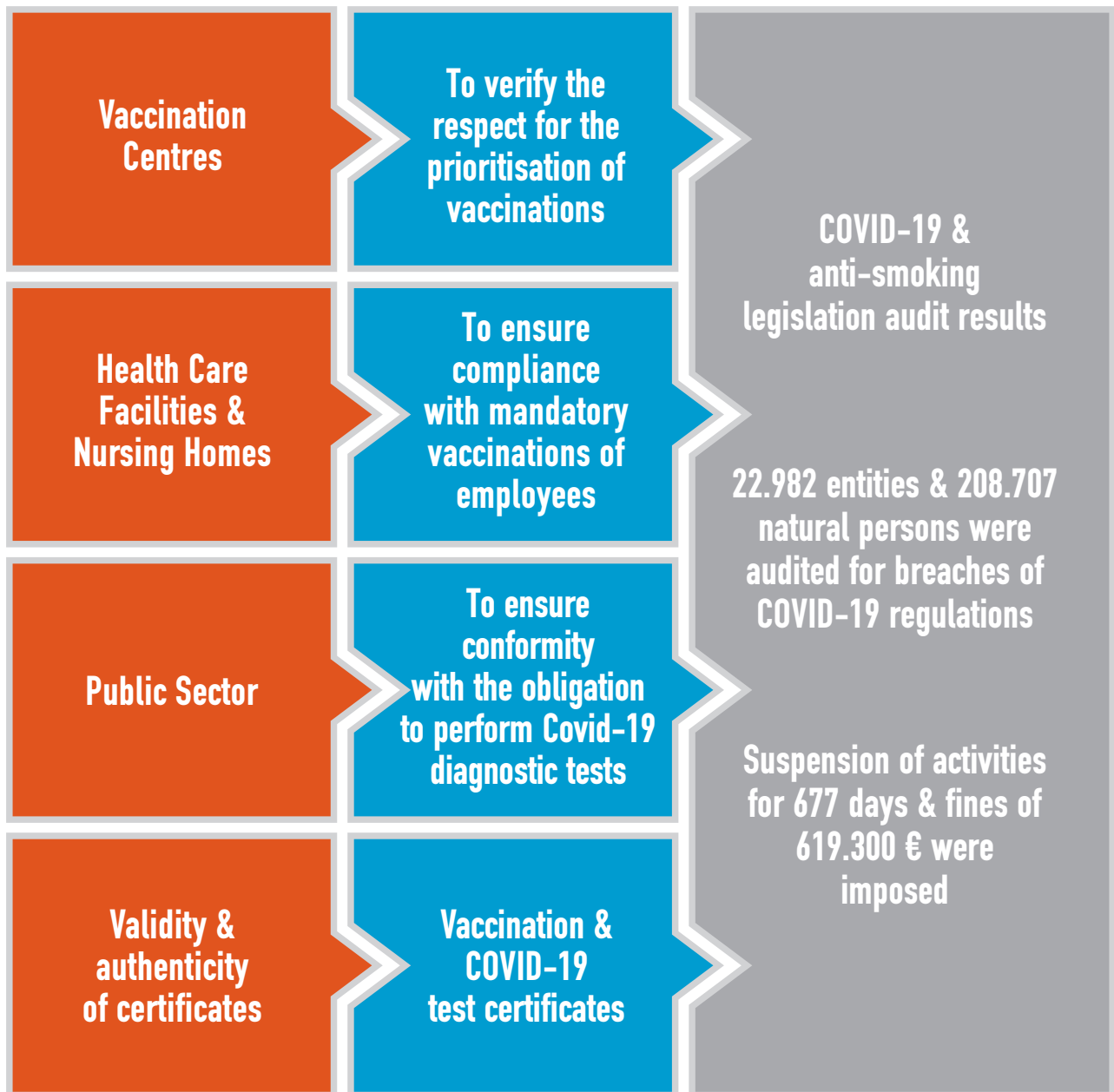
13.745 asset declarations of natural persons falling within the responsibility of the NTA were audited with regard to their completeness

Prioritisation on the basis of the application of risk analysis criteria and comprehensive audit on 101 declarations of assets and financial interests

Inclusion of audits in the Annual Asset Declaration Audits Programme

Increases in existing assets amounting to a total of 522.366 € were found in 4 cases

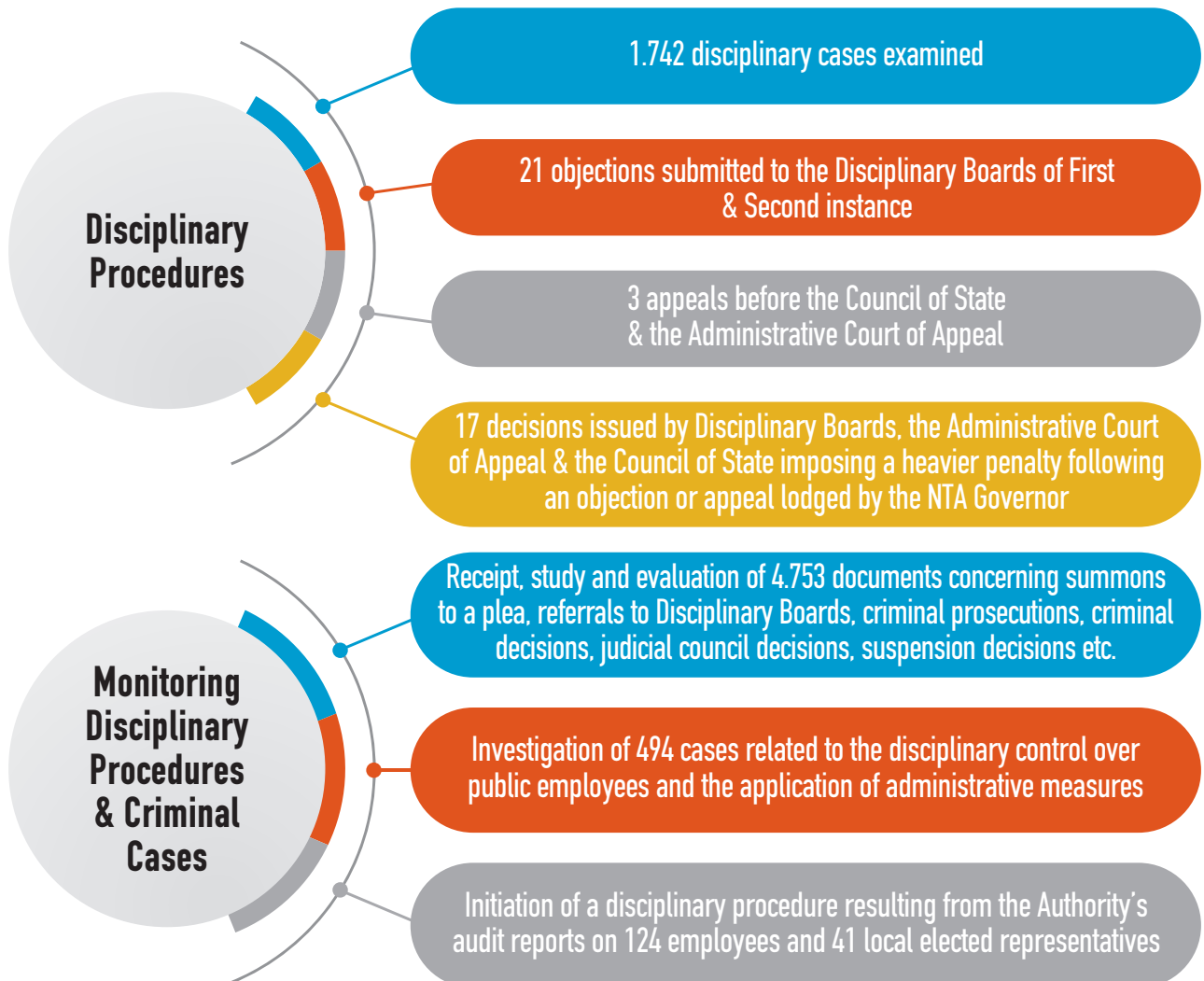
Systemic Audits



Implementation of Proposals - Recommendations

87,14% of proposals - recommendations resulting from audit reports were implemented by the audited entities

90,87% of the audited entities informed the Authority of their implementation progress



Preliminary Investigations

A total of 37 orders from judicial authorities concerning both 2021 and previous years were executed.

Modernisation of tools and standards

Adoption of an Audit Regulation

Update of the Risk Analysis Criteria Manual for asset declaration audit sampling

Update of the Asset Declaration Audit Procedures Handbook

2.2. National Coordinating Body for Audit and Accountability (ESOEL)

The key elements of the institution's work in 2021 were the following:

1. Providing guidance for the faster completion of audit reports relating to cases for which audit orders were issued by mixed audit teams in the framework of the operation of the Coordinating Body for Inspection and Audit, the universal successor of which is the ESOEL.
2. Distribution of information among ESOEL members on their responsibilities and actions.

In this context, following the presentations held in 2020, the below-mentioned bodies-members of ESOEL presented their responsibilities as well as proposals for developing synergies among the members of the Body:

- Financial Audit Committee of the Ministry of Finance
- Internal Audit Directorate of the Independent Authority for Public Revenue (IAPR)
- Financial Inspection Directorate of the Hellenic National Defence General Staff
- Department of Internal Affairs of the Ministry of Defence
- Inspectorate General of the Ministry of Foreign Affairs
- General Secretariat for Natural Environment and Water (General Directorate for Inspection Bodies of the Ministry of Environment and Energy)
- Cybercrime Prosecution Directorate of the Hellenic Police Headquarters

In addition, targeted presentations on actions within the remit of the Institution's bodies-members were held with respect to the following topics:

- Online risks and cybercrime in the COVID-19 era. How to manage the pandemic (Cybercrime Prosecution Directorate of the Hellenic Police Headquarters)
- Developments in the disciplinary procedure in the public sector (Civil Servants' Code, Disciplinary Law) (NTA)

- Risk Based Audit Plan (NTA)
- Remote auditing during the COVID-19 pandemic (NTA)
- Case studies on remote auditing (Internal Audit Directorate of IAPR, Financial Audit Committee of the Ministry of Finance)

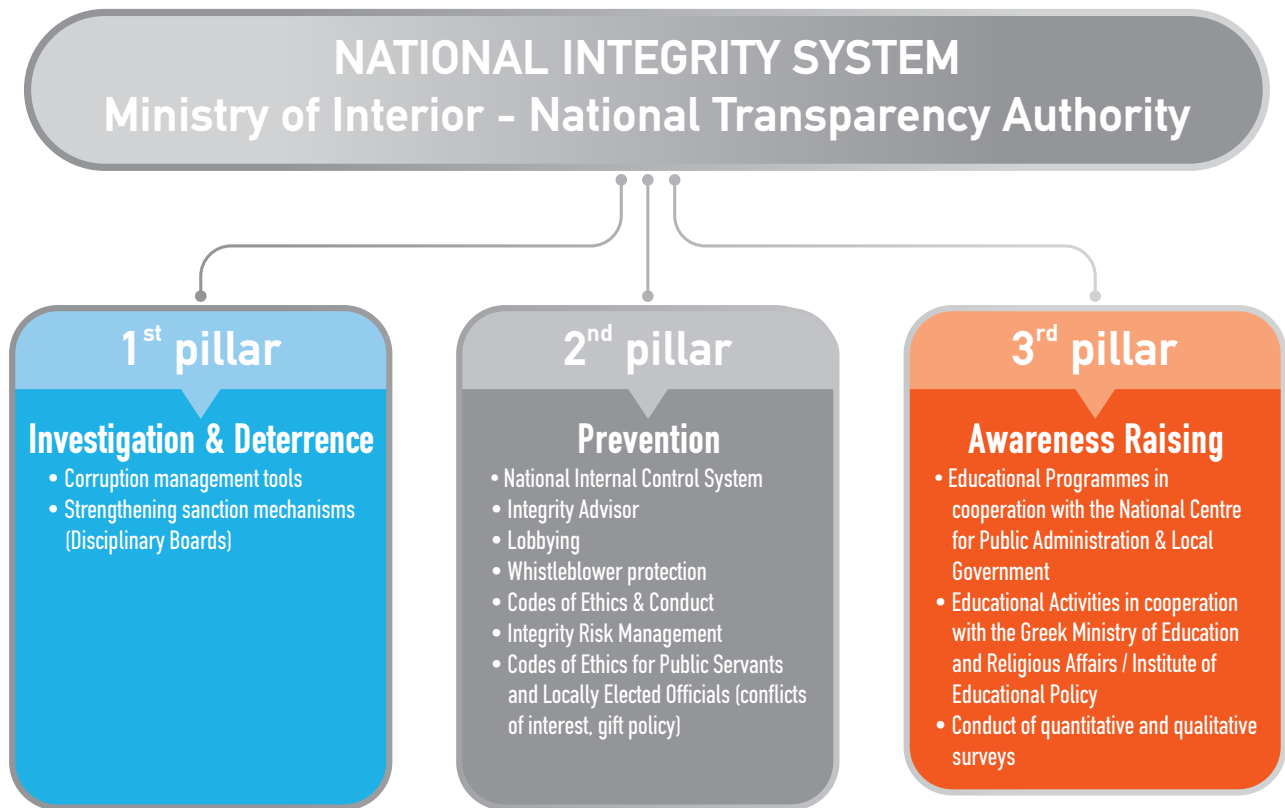
3. Development of common standards and tools with the aim of sharing know-how and enhancing the coordination and effectiveness of the action of the audit bodies participating in the ESOEL. In this light, three guides in the following thematic areas have been completed and published:

- Methods of data analysis in the context of audit missions
- Interview techniques
- Performance Control Guide

4. Design and implementation of training and education actions in subjects relevant to the achievement of the goals of the ESOEL.

In this context, a working group was set up for cooperation between the members of the Body on educational issues. In 2022, the Working Group is expected to implement training and education actions for the staff of the bodies participating in the ESOEL.

2.3. National Integrity System



Pillar of Investigation and Deterrence

Monitoring of Disciplinary Cases - e-Peitharxika

The NTA developed an in-house electronic platform to monitor the progress and outcome of disciplinary cases before disciplinary boards from the day on which a case is brought before the competent Disciplinary Board until the adoption of the final decision.

Pillar of Prevention

Codes of Ethics and Professional Conduct

The Authority provides assistance and know-how to other public sector bodies for the adoption and implementation of

codes of ethics as well as other policies, standards, frameworks and methodologies for strengthening and ensuring integrity and ethics.

In this context, the following codes were prepared:

- the Code of Ethics of the General Secretariat for Citizenship of the Ministry of Interior
- the Code of Ethics of the Hellenic Food Authority (EFET)
- the Code of Ethics for Public Administration Internal Auditors

Integrity Advisor

Law 4795/2021 (Government Gazette, Series I, No 62) established the Integrity Advisor in the public administration in order to strengthen accountability and integrity mechanisms in public sector bodies. The core mission of the Integrity Advisor is to ensure a coherent framework of safeguards and mechanisms that will guide and facilitate employees' choices on ethics and integrity.

The NTA actively participated and developed initiatives for the design, organisation and implementation of the training programme for the certification of the professional competence of Integrity Advisors, in cooperation with the Ministry of Interior and the Training Institute (INEP) of the National Centre for Public Administration and Local Government.

CERTIFICATION OF INTEGRITY ADVISORS

1 st Training Cycle 9.7.2021-22.9.2021	
Number of trainees by type of entity	
MINISTRIES	9
LEGAL ENTITIES OF PUBLIC LAW	8
MUNICIPALITIES	3
INDEPENDENT AUTHORITIES	2
REGIONS	1
OTHER	1
Total (1 st cycle)	24
2 nd Training Cycle 15.11.2021-13.12.2021	
Number of trainees by type of entity	
MINISTRIES	11
REGIONS	3
MUNICIPALITIES	3
LEGAL ENTITIES OF PUBLIC LAW	3
INDEPENDENT AUTHORITIES	2
OTHER	1
Total (2 nd cycle)	23
Overall Total	47
Successful Completion	36
Unsuccessful Completion	11

Source: data generated and maintained by the NTA

Lobbying

For the first time in Greece, Law 4829/2021 (Government Gazette, Series I, No 166) aims to create a legislative framework regulating the communication of state institutions with interest representatives, with the ultimate aim of ensuring integrity, transparency and accountability in the exercise of lobbying activities. In addition, Law 4829/2021 seeks to regulate the gift policy, i.e. to enhance transparency and accountability when offering gifts, benefits, hospitality or other advantages to the President of the Republic, the members of the Government and the Deputy Ministers, by introducing rules on ownership, administration, management, recording, disclosure and use of the objects offered to such persons because of their institutional status.

Whistleblower Protection

The NTA contributed to the work of the Special Drafting Committee set up by the Ministry of Justice with the aim of drawing up a draft law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law. For the first time there is provision for the establishment and operation of internal reporting channels in private and public bodies for the submission of confidential reports safely and without fear of retaliation by employees as well as persons who deal professionally with these bodies, concerning corruption and integrity violations in the context of their professional relationship with the body. At the same time there is provision for the operation of an external reporting channel to which the above persons can report directly, when they consider that appropriate actions will not be taken using the internal channel or that they will be subject to retaliation in their working environment as a result of their reporting. The conclusion of the committee submitted to the Minister of Justice provides, inter alia, for the designation of the NTA as the external reporting channel.

Pillar of Awareness Raising

Celebration of the International Anti-Corruption Day at Schools

On the occasion of the International Anti-Corruption Day (December 9th), teachers and students were invited to familiarise themselves with corruption and integrity issues using the toolkit that has been developed in the framework of the NACAP 2018-2021 in cooperation with UNODC, the Ministry of Education and Religious Affairs and the Training Institute (INEP), and posted on the website of the NTA.

Interventions in the Curricula of the Primary and Secondary Education

In the context of preparing the new curricula for Primary and Secondary Education, the NTA cooperated with the Institute of Educational Policy of the Ministry of Education and Religious Affairs for the integration into the skills workshops of thematic areas promoting values such as dignity, respect, transparency, accountability, equity and equality, in order to familiarise students with these concepts.

Student Competition "Integrity leaders of tomorrow"

In cooperation with the Ministry of Education and Religious Affairs and the Institute of Educational Policy, the 1st National Competition of Student Creativity for Primary and Secondary Education "Integrity Leaders of Tomorrow" was completed during the reporting year with the participation of 217 students from 37 schools from all over the country.

Seminars for teachers to increase students' awareness on integrity issues

The seminars were addressed to teachers of Primary and Secondary Education and were organised by the UNODC in cooperation with the NTA, the Ministry of Education and Religious Affairs and the Institute of Educational Policy in the framework of the implementation of the National Anti-Corruption Action Plan (NACAP 2018-2021).

2.4. Internal Control System

A. Legislative Initiatives

Law 4795/2021 on the Internal Control System of the Public Sector, Integrity Advisor in the Public Administration and other provisions on public administration and local government (Government Gazette, Series I, No 62) was adopted in April 2021. This law was the product of cooperation between the representatives of the Court of Auditors, the Legal Council of the State, the NTA and the Ministries of Finance, Interior and Digital Governance.

Law 4795/2021 establishes an integrated framework for the operation of an Internal Control System in all public sector bodies in accordance with international auditing standards and good practices in order to strengthen the accountability mechanisms necessary for the effective functioning and protection of the public sector against maladministration, low productivity and corruption.

Within the framework of its responsibilities for the development of the institutional and organisational framework of the national Internal Control System, the NTA played an important role in this legislative undertaking, participating in the committee and working group set up for the legal drafting of the law by the claimant Ministry of Interior.

B. Actions to support entities

- Participation of the NTA's officials in the working group set up to submit a proposal for the specification of the establishment criteria and operating conditions of the Internal Audit Units in the first-level local authorities. The working group consisted of members of the Central Union of Municipalities of Greece, the Hellenic Agency for Local Development and Local Government and the Ministry of Interior.
- Coordination and consultancy support for the operation of the Internal Audit Units.
- Establishment of the Register of Internal Audit Units of public sector entities.

- Development of a number of tools, standards, methodologies and guides related to the practical implementation of the internal audit function in public sector entities as part of actions supporting the newly established Internal Audit Units.

Evaluation tool of the Internal Control System for Financial Management

The maturity level of the Internal Control System for Financial Management within ministries was estimated via a questionnaire which was developed as a tool to describe the system's operation. This questionnaire was used to collect information and documentation, and to conduct interviews with the officials responsible for financial management.

The main objective was to understand and assess the degree of development and functioning of the Internal Control System for Financial Management, based on the provisions of Law 4795/2021, in order to identify the opportunities for improvement.

The questionnaire was structured on the five-pillar basis of the COSO IC-IF 2013 model and included twenty-five (25) open-ended and closed-ended questions. It was sent to the official secretaries of the ministries who have institutional responsibility for supervising the smooth and effective administrative and financial functioning of their ministries.

Design, organisation and implementation of the training programme "Certification of Auditing Adequacy of the Internal Auditor of the Public Sector"

CERTIFICATION OF INTERNAL AUDITORS

Internal Auditors Certification Cycles	
1 st cycle:	07.07.2021-20.09.2021
2 nd cycle:	04.10.2021-01.11.2021
3 rd cycle:	08.11.2021-06.12.2021
4 th cycle:	22.11.2021-20.12.2021
Number of trainees by type of entity	
MINISTRIES	43
FIRST AND SECOND LEVEL LOCAL AUTHORITIES	17
INDEPENDENT AUTHORITIES	9
UNIVERSITIES	7
OTHER ENTITIES	26
Overall total	102
Successful Completion	100
Unsuccessful Completion	2

Source: data generated and maintained by the NTA

2.5. Memoranda of Understanding

In the framework of cooperation for the strengthening of procedures and mechanisms to enhance and ensure transparency and legitimacy in the functioning of public bodies as well as the promotion of the principles and values of public integrity and accountability, the NTA signed in 2021 cooperation agreements and protocols on internal audit, training and awareness raising in the field of integrity, administration of disciplinary justice, business ethics and digital transformation, with the following bodies:

1. The Ministry of Education and Religious Affairs
2. The Ministry of Maritime Affairs and Insular Policy
3. The General Secretariat of Information Systems for Public Administration of the Ministry of Digital Governance
4. The Harokopio University
5. The Economic Chamber of Greece
6. The Ionian University
7. The Ministry of Migration and Asylum
8. The Electronic National Social Security Fund (e-EFKA)

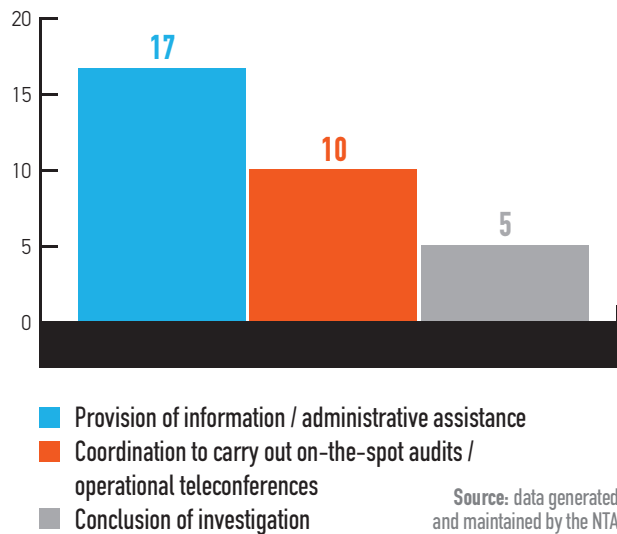
9. The Panteion University
10. The General Secretariat for Natural Environment and Water of the Ministry of Environment and Energy
11. The Region of Attica and the Ministry of Interior
12. The Region of Crete and the Ministry of Interior
13. The National Fund of Greece (Growthfund)

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

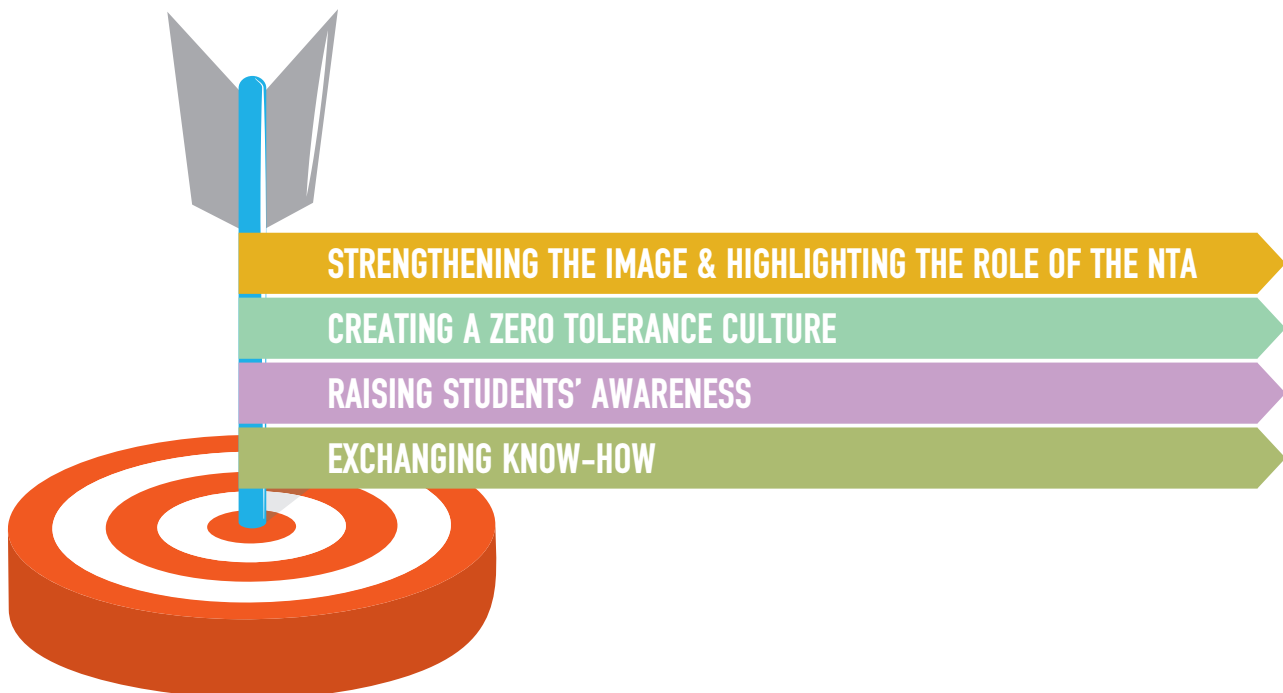
In 2021, 67 officials from 32 bodies/agencies, including the Special Agency for Institutional Support, the Special Managing Authorities for the NSRF Operational Programmes, the Financial Audit Committee, the Certification Authority of the Greek Government, the Independent Authority for Public Revenue, the Economic Police Directorate, the Special Secretariat for Financial and Economic Crime Unit (SDOE), the Special Agency for State Aid and the Payment and Control Agency for Guidance and Guarantee Community Aid (OPEKEPE) participated in the networking platform of NTA/AFCOS.

The electronic platform of NTA/AFCOS is constantly updated with informative and educational material which registered entities can freely consult. The content of the platform is accessible to certified users from entities registered on the AFCOS network and includes, inter alia, news articles, regulations, directives and decisions on the protection of the financial interests of the EU, national laws, good practices, case studies, guides and manuals, risk analysis tools and training seminars.

AFCOS ACTIONS - COORDINATION FOR COOPERATION WITH OLAF



2.7. Raising Awareness



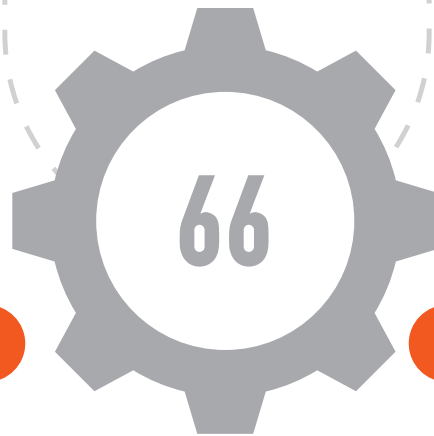


Events



Participants

Public and private
sector bodies



9 workshops, 7 webinars

1st Integrity Forum

4 actions for the educational community

4 actions under the auspices of the NTA

Participation in the Thessaloniki International Fair (TIF)

Social media followers



3.093



305



590



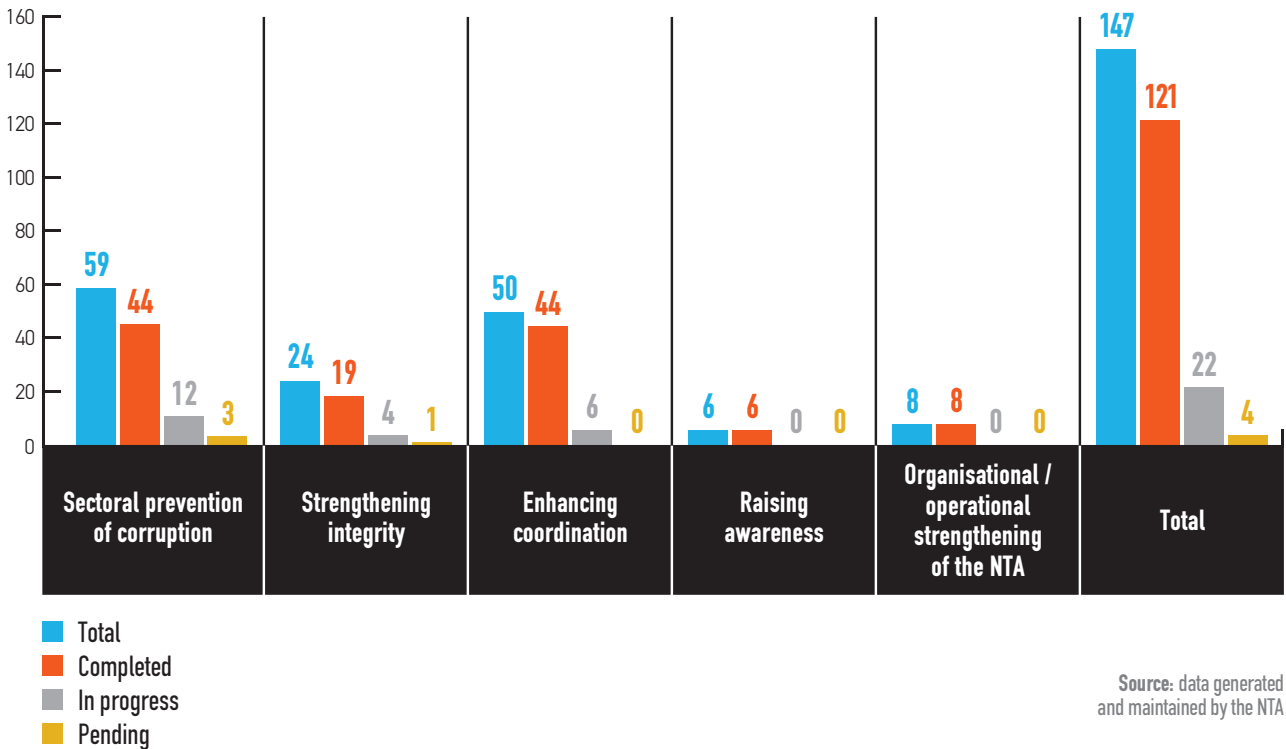
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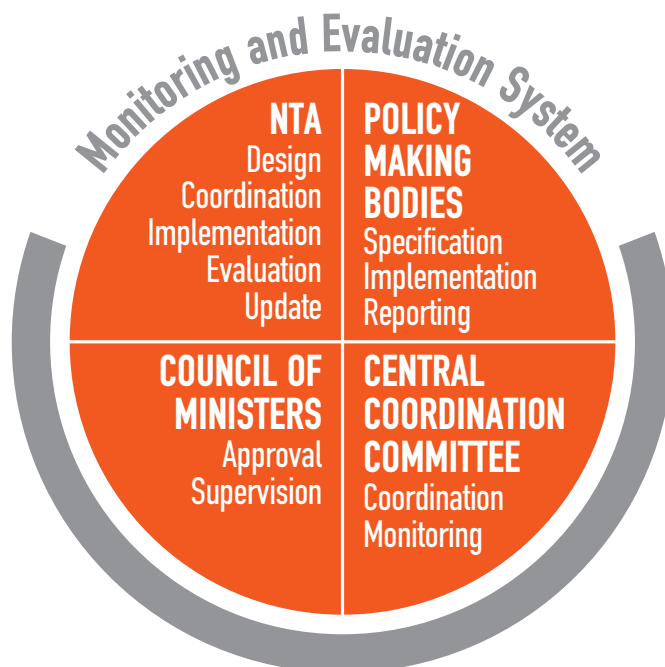
1.200

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

NACAP IMPLEMENTATION PROGRESS (UNTIL 31.12.2021)



Governance Scheme of NACAP 2022-2025



Parts of NACAP 2022-2025



Strategic and Specific Objectives of NACAP 2022-2025

Part A	Part B	Part C
Audits/ Investigations	Prevention Integrity Accountability	Information Publicity Awareness Raising
Upgrading the audit work to combat phenomena of fraud and corruption	Strengthening integrity and accountability to prevent and deter phenomena of fraud and corruption	Systematic information and awareness raising of citizens to enhance their participation in the national effort to combat corruption

Specific Objectives



Specific Objective



2.9. International Presence



NETWORK OF CORRUPTION
PREVENTION AUTHORITIES

Member of SPIO
working party

Member of the
Executive Committee

Member of International
Alliance LEGA



Evaluation of Greece by European and International Organisations

- Greece's phase 4 evaluation by the OECD regarding the implementation of the Convention on Combating Bribery of Foreign Public Officials
- Fifth evaluation round of Greece by the Group of States Against Corruption (GRECO)
- European Commission 's second evaluation of Greece on the Rule of Law for the year 2021

Participation of the NTA in events, actions, committees, working groups and cooperation networks at international and European level

- Ninth session of the Conference of the States Parties to the United Nations Convention against Corruption (CoSP - UNCAC, Sharm El-Sheikh, Egypt, 13 - 17.12.2021)
- United Nations General Assembly Special Session against corruption (UNGASS)
- OECD Global Anti-Corruption & Integrity Forum

Participation in Committees and Working Groups

- Meetings of the Advisory Committee for the Coordination of Fraud Prevention (COCOLAF) and its working groups
- Working Group on Combating Fraud (GAF) of the Council of the European Union
- Workshop of the Spanish AFCOS "Strengthening the National Anti-Fraud Strategy in Spain"
- Educational Project "Cooperation Agreements and Training on Objectives and New Experiences - CATONE"
- Educational Workshops in the context of the UNODC technical assistance - Priority Axis 3 "Strengthening the operation of the Greek Anti-Fraud Coordination Service (AFCOS) according to EU regulations."

Participation in Networks

- Network of Corruption Prevention Authorities of the Council of Europe
- Senior Public Integrity Officials (SPIO) of OECD
- International Association of Anti-Corruption Authorities (IAACA)
- International Anti-Fraud Alliance "Law Enforcement and Government Alliance"

Bilateral Cooperation with Foreign Anti-Corruption Authorities

The cooperation of the NTA with foreign anti-corruption authorities is close and continuous. On 19.04.2021, the Hong Kong Independent Commission against Corruption, which is considered a pioneer in the development of internationally recognised anti-corruption strategies, provided a webinar to twenty NTA officials on preventing corruption in an economically effective manner. In addition, NTA officials met online with officials of the French High Authority for Transparency in Public Life (HATVP) in order to discuss the French legal and institutional framework for regulating lobbying which has been in force since 2016 and provided the basis for the development of the corresponding Greek one.

2021 Corruption Perceptions Index

Greece's position in Transparency International's 2021 Corruption Perceptions Index (CPI) showed a clear improvement. Our country occupied the best position of the last ten years and is ranked 58th among 180 countries. At the same time, it marked its second-best performance for the period 2012-2021, scoring 49 points in 2021, after last year's performance of 50 points.

This indicator reflects the level of perception of corruption in 180 countries, using a 0 - 100 scale, where 0 corresponds to countries with a high corruption perception level and 100 to countries with a low corruption perception level.

It is pointed out that Transparency International's official 2021 report includes Greece among the countries that have recorded the most significant progress in the world, having "... reaped the rewards of anti-corruption reforms".

3

OPERATIONAL PLANNING FOR 2022

The NTA's operational planning for 2022 concerns the entire operational functioning of the Authority. The main projects and actions (already planned for implementation in 2022) include interventions in the following areas:

- Organisational Change Management
- Optimisation of the operational capacity of the audit mechanism
- Digital Transformation
- Personal Data Protection
- Internal Control System
- Staffing of the Authority
- Education and Training
- National Anti-Corruption Action Plan (NACAP)
- International Presence
- Strengthening Integrity & Accountability
- Raising Awareness and Information



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ISSN: 2732-9429 (online)
ISSN: 2732-9410 (print)