

2023



HELLENIC REPUBLIC

ANNUAL REPORT



NATIONAL TRANSPARENCY AUTHORITY

TABLE OF CONTENTS

	ACRONYMS + ABBREVIATIONS	4
	GOVERNOR'S MESSAGE	6
	CHAIRMAN'S MESSAGE	7
	INTRODUCTION	8
1.	NTA AT A GLANCE	10
2.	OPERATIONAL ACTIVITY	16
2.1.	Audits & Investigations	16
2.2.	Strengthening Integrity and Accountability	20
2.2.1.	National Integrity System (NIS)	20
2.2.2.	Internal Control System	21
2.2.3.	Risk Management	22
2.2.4.	Whistleblowers Protection	22
2.2.5.	Protecting the EU's Financial Interests (AFCOS)	22
2.3.	Raising Awareness	23
2.4.	National Anti-Corruption Action Plan (NACAP)	25
2.5.	National Coordinating Body for Audit and Accountability (ESOEL)	26
2.6.	Ethics Committee	27
2.7.	Internal Audit	27
2.8.	Personal Data Protection	27
2.9.	International Presence	28
2.9.1.	International Evaluations	28
2.9.2.	International Partnerships	28
3.	OPERATIONAL PLANNING FOR 2024	31

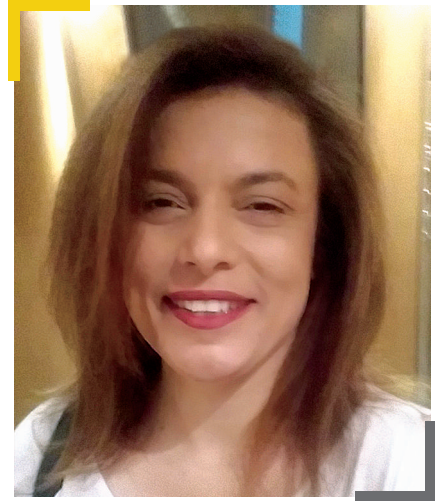
ACRONYMS + ABBREVIATIONS

AFA	Anti-Corruption Agency of the French Republic
AFCDS	Anti-Fraud Coordination Service
AI	Artificial Intelligence
ANI	National Integrity Agency of Romania
CIEEL	Centre of International and European Economic Law
COCOLAF	Comité de Coordination de Lutte Antifraude
COSO	Committee of Sponsoring Organizations of the Treadway Commission
CoSP10	10 th Conference of States Parties to the UN Convention against Corruption
CPI	Corruption Perceptions Index
CSO	Civil Society Organisation
DG HOME	Directorate-General Migration and Home Affairs
DG REFORM	Directorate-General for Structural Reform Support
DPIA	Data Protection Impact Assessment
EEA	European Economic Area
ELRN	European Lobbying Registrars' Network
ENPE	European Network for Public Ethics
ESOEL	National Coordinating Body for Audit and Accountability
EU	European Union
FRED	Fraud Repression through Education
GRECO	Group of States Against Corruption
HDPa	Hellenic Data Protection Authority
HLI	Hellenic Labour Inspectorate
HSPPA	Hellenic Single Public Procurement Authority
IAACA	International Association of Anti-Corruption Authorities
IAPR	Independent Authority for Public Revenue
ICAC	Independent Commission Against Corruption of Hong Kong
IEP	Institute of Educational Policy
NACAP	National Anti-Corruption Action Plan
NACC	National Anti-Corruption Commission of Australia
NCPA	Network of Corruption Prevention Authorities





NIS	National Integrity System
NSRF	National Strategic Reference Framework
NTA	National Transparency Authority
OECD	Organisation for Economic Co-operation and Development
OIRA	Online interactive Risk Assessment
OLAF	Office Européen de Lutte Antifraude
OPEKA	Organisation of Welfare Benefits and Social Solidarity
OPN	Online Publication Number
PACE	Public Administration Cooperation Exchange
PMO	Project Management Office
RPA	Record of Processing Activities
RRF	Recovery and Resilience Facility
RRFR	Responsible for Receiving and Following-up of Reports
SDOE	Economic Crime Prosecution Service
SMART	Specific, Measurable, Attainable, Relevant, Time-bound
SPIO	Senior Public Integrity Officials
TIF	Thessaloniki International Fair
TSI	Technical Support Instrument
UAE SAI	United Arab Emirates Supreme Audit Institute
UN	United Nations
UNODC	United Nations Office on Drugs and Crime
VoIP	Voice over IP



Governor's Message

NTA Interim Governor

Alexandra Rogkakou

Since its establishment in 2019, the National Transparency Authority (NTA) systematically designs and implements a comprehensive anti-corruption policy in Greece. The Authority follows a three-pronged approach to tackle corruption focusing on Detection - Prevention and Awareness-raising.

In 2023, NTA carried out more than 2.500 investigations and audits throughout Greece and developed a series of tools and methodologies for risk management and internal audit to strengthen integrity safeguards across the Public Administration. In August 2023, we launched a modern whistleblowing platform to facilitate anonymous reporting on breaches of EU Law and further expanded our operational scope to receive complaints on incidents of workplace violence and harassment (mobbing) in public bodies.

At the international level, emphasis was given to bilateral and multilateral cooperation and know-how exchange initiatives with foreign counterparts. At the same time, NTA organized awareness-raising activities for the educational community as well as a series of information and training events to highlight the value of public accountability in strengthening citizens' trust in public institutions.

With transparency and openness, we present, for yet another year, data and information on our work accomplished throughout 2023 thanks to the professionalism, consistency and conscientiousness of our staff. Our commitment is to continue our efforts with the same vigor in 2024, always with a view to the well-being and interest of the Greek society.



Chairman's Message

Acting Chairman of the Management Board

Nikolaos Douladiris

In 2023, the National Transparency Authority, after a long period during which the pandemic and the monitoring of compliance with the relevant obligations occupied a large part of its activity, was able to reshape its objectives unaffected by the urgent needs of current events and to focus on the core of its work, confirming its primary role in preventing and combating corruption and in consolidating the principle of integrity throughout the country's public sector.

Among the most important achievements of NTA for the year 2023, which the Management Board monitored and supported with improvement proposals, was the operation of the Transparency Registry maintained by the Authority for the registration of interest representatives under Law 4829/2021, the implementation of the new system for goal-setting and evaluating public administration under Law 4940/2022, the provision of support to Public Sector Internal Audit Units, as well as the development of the Integrity Advisor institution.

As acting President of the Management Board, I would like to stress and commend the continued commitment of all NTA staff to the realisation of its vision to stand by every citizen and every public official and to take effective action to uphold legality, combat maladministration and ensure that all public bodies implement the measures necessary to achieve these goals. I would also like to thank both the outgoing President Menelaos Tsouplakis and the other members, as well as the associates of the Management Board for their contribution to its efficient operation and the constructive monitoring of the work of the Authority.



Introduction

The Annual Report of the National Transparency Authority for 2023 is the fifth report since the establishment and operation of the Authority and presents all the activities carried out during the reporting year, as well as the actions included in its operational planning for 2024.

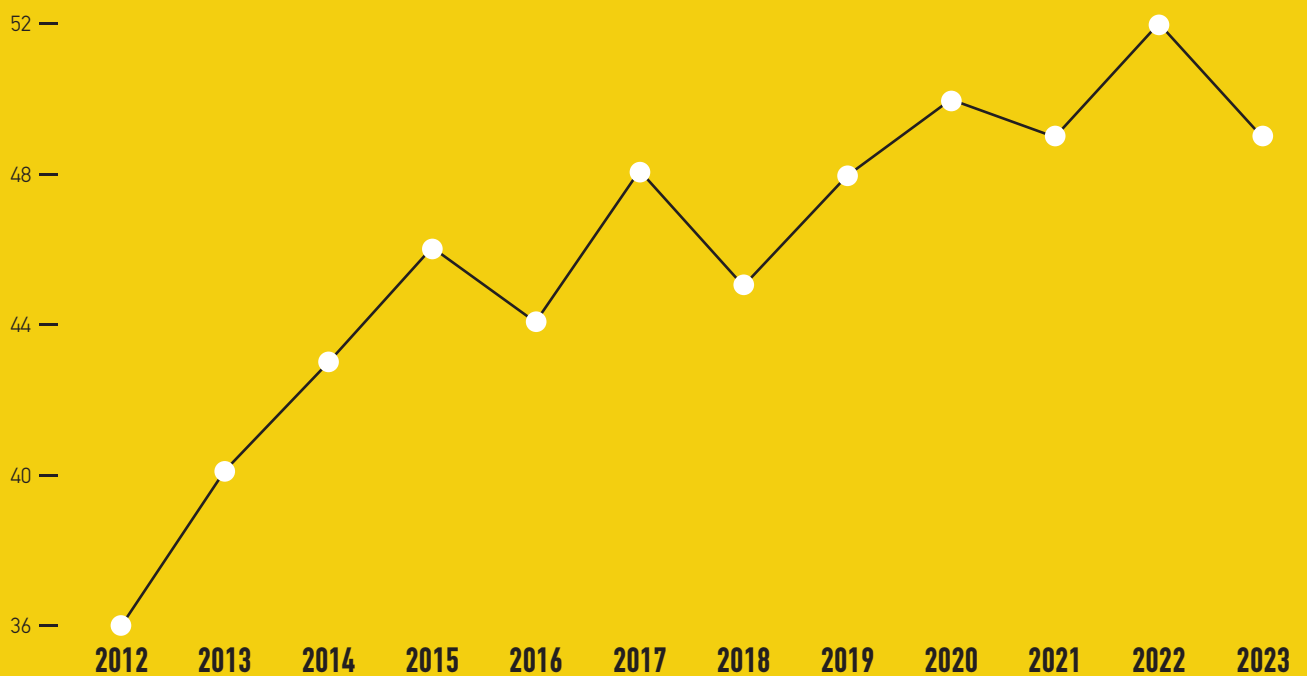
The report is provided for in Article 85(5) of Law 4622/2019 and is a key tool for accountability and control of the Authority's action. It is submitted by the Governor of NTA, upon approval by the Management Board, to the Speaker of Parliament and to the competent Committee on Institutions and Transparency,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

The first section of the report provides an overview of the Authority's profile, including its institutional framework and strategic objectives, its strategic plan for the period 2023-2027 and operational goal-setting plan for 2023, HR and budget data, NTA's digital transformation strategy and its project portfolio.

The second section presents the core activities of NTA in its three main operational pillars (audits and investigations – integrity and accountability – awareness and communication) as well as the progress in the implementation of the National Anti-Corruption Action Plan and the international presence of the Authority. In addition, it describes the activities of the National Coordinating Body for Audit and Accountability, the Ethics Committee, the Internal Audit Directorate and the Personal Data Protection Office.

The third section presents the planning of the main projects and actions for the year 2024 across the entire range of NTA's activities.

CORRUPTION PERCEPTIONS INDEX



Score changes 2012-2023

- ▶ TI considers GR a Significant Improver
- ▶ GR score is among the top 30% worldwide

1 NTA AT A GLANCE

The National Transparency Authority (NTA) was established by Law 4622/2019
[Government Gazette 133/A']

- Independent Authority without legal personality
- Enjoys operational independence, administrative and financial autonomy
- Subject only to parliamentary control
- Exercises its competences across the public sector including:
 - bodies and services of the General Government
 - local authorities
 - legal entities governed by public law
 - state legal entities under private law and public enterprises
 - private bodies which enter into any type of contract with the public sector
- NTA's territorial jurisdiction extends throughout Greece

Operational Pillars

DETECTION

Perform audits and investigations

PREVENTION

Develop internal audit standards, codes of ethics/conduct, conflict of Interest, sectorial anti-corruption strategies et.al.

RAISING AWARENESS

Promote trust to public institutions, educate the youth, engage citizens and civil society organisations

Strategic Objectives



- 1 Improve the effectiveness of audits/investigations
- 2 Enhance corruption prevention
- 3 Raise anti-corruption awareness
- 4 Design, monitoring and evaluation of NACAP
- 5 Effective and efficient operation of the Organisation



Strategic Plan 2023–2027

- Important planning tool that sets medium term strategic and operational priorities
- Product of broad consultation with the Organisation's management and staff
- Published in March 2023

The Strategic Plan 2023–2027 is available at:

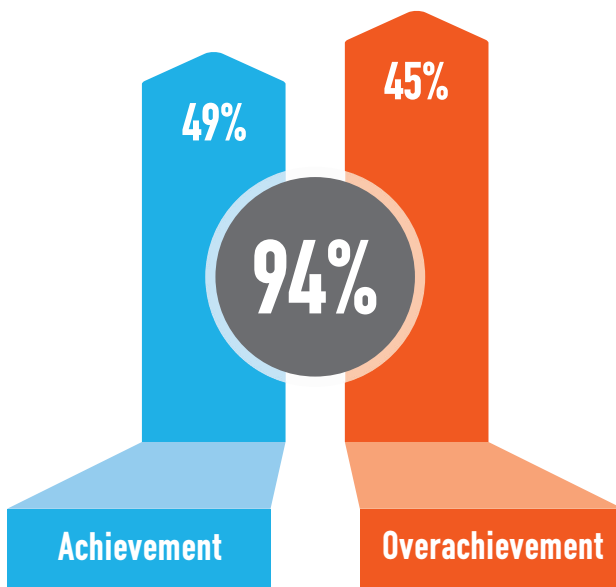
 <https://aead.gr/publications/essays/stratigiki-sxedio-ead-2023-2027>

Operational Goal-Setting

For the fourth consecutive year, NTA developed its annual operational goal-setting plan in alignment with the Strategic Objectives and Operational Axes of the Strategic Plan 2023-2027. Goal-setting followed the SMART approach, new objectives were added, key performance indicators were set. The implementation progress of the Plan is monitored on a six-month basis.

Out of 471 goals:

Achievement rate of NTA goals



Source: Data generated and maintained by the NTA

New responsibilities

Recent provisions have given NTA new responsibilities in the following areas:

- **Risk management**

Articles 21¹ and 22² of Law 5013/2023
(Government Gazette 12/A¹)

- **Asset declaration**

Articles 24³, 25⁴ and 27⁵ of Law 5026/2023
(Government Gazette 45/A¹)

- **Mobbing**

Article 5⁶ of ministerial decision ΔΙΔΑΔ/Φ.64/946/οικ.858 /2023
(Government Gazette 343/B¹) and Article 1⁷ of ministerial decision ΔΙΔΑΔ/Φ.64/996/οικ.6766/2023 (Government Gazette 2561/B¹) adopted pursuant to the empowering provision of paragraph 4 of Article 22 of Law 4808/2021 (Government Gazette 101/A¹)

- **State response to natural disasters**

Cabinet Act 12/2023
(Government Gazette 138/A¹)⁸

- **Public Health Audits**

Article 118⁹ of Law 5034/2023
(Government Gazette 69/A¹)

Human Resources & Staff Development



518 positions (74% of the posts are filled by 31.12.2023)

91% highly skilled personnel

62% female

Inhouse training

► Implementation of a multi-disciplinary training programme with 357 participants from the NTA and the broader public sector

¹ NTA shall set out the standards for the risk management policy and framework and provide guidance on their drafting and implementation.

² NTA is responsible to design the specific Risk Management Professional Certification Programme of the National Centre for Public Administration & Local Government.

³ Following a decision of the Audit Committee, NTA undertakes the preparation, administration and management of the necessary contracts for the development, improvement and maintenance of the electronic applications of the IT systems for the submission of declarations and monitors the progress of project acceptance and implementation.

⁴ The NTA Governor shall be appointed as a full member of the Audit Committee, which shall act as a special body.

⁵ NTA retains its power of audit over specific categories of persons liable to submit declarations of assets and financial interests, as a special audit body.

⁶ NTA is designated as the competent body to receive complaints about incidents of workplace violence and harassment (mobbing), provided that the employee has previously lodged a complaint before his/her employing institution or a supervising body of the employing institution or the Greek Ombudsman.

⁷ NTA investigates any disciplinary responsibilities of the institution before which the complaint was lodged and which wrongfully delayed the examination of the complaint, with the exception of cases where the complaint was lodged before the Greek Ombudsman.

⁸ The NTA Governor is a member of the Governmental Committee for State Aid.

⁹ The NTA Inspectors-Auditors are designated, among others, as responsible for the application of healthcare provisions, in accordance with the provisions governing their organisation and operation.

Financial Management

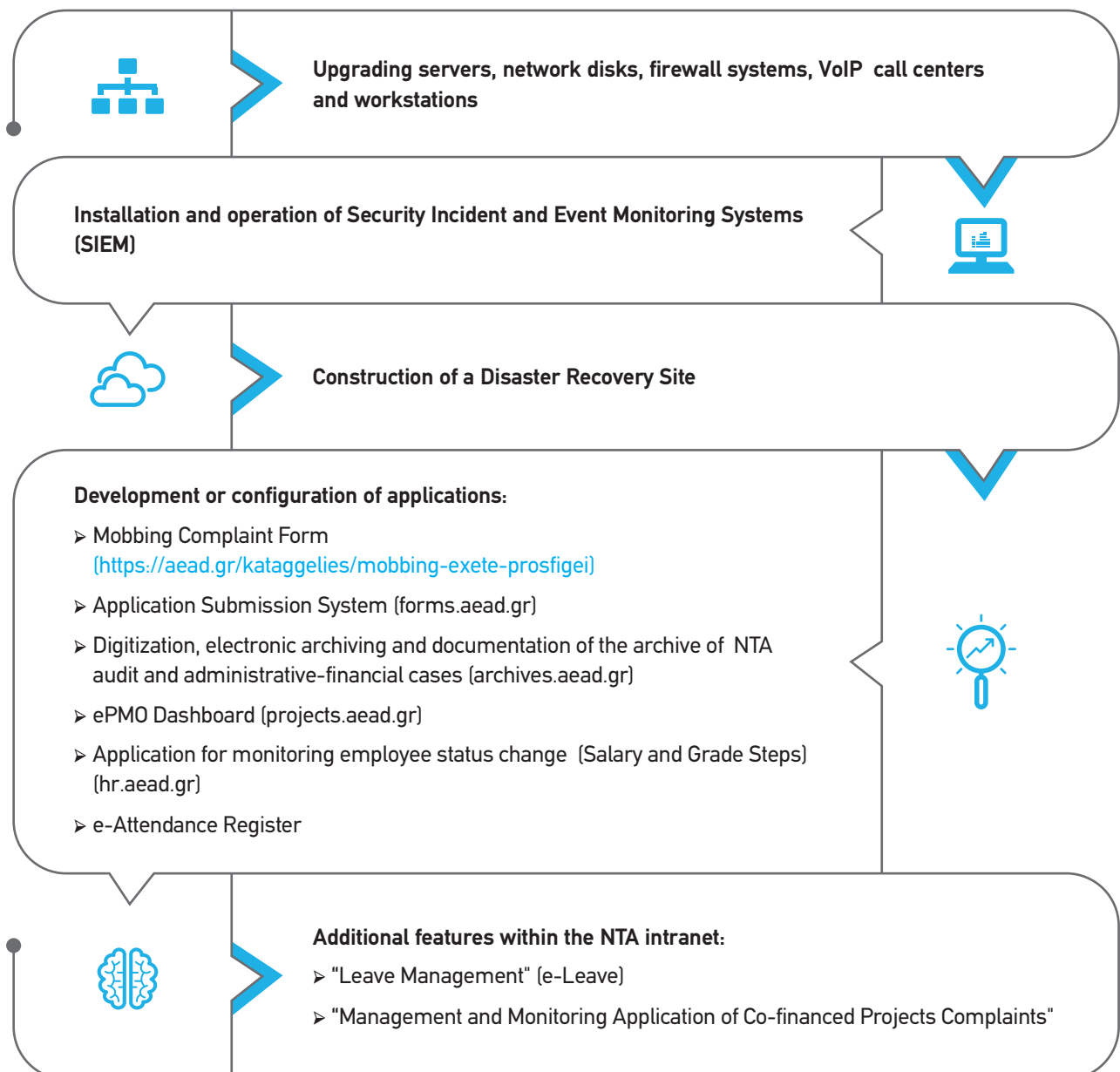
Annual budget: approx. 9 million euros
Development of cost reduction policies

Compliance rate of NTA internal control system for financial management is 96%.

Budget Allocation	
MC 21 - Wages and Benefits	5.474.181 €
MC 24 - Purchases of Goods and Services	2.860.099 €
MC 27 - Other Expenditure	500 €
MC 31 - Fixed Assets	395.000 €
TOTAL	8.729.780€

Source: Data generated and maintained by the NTA

Digital Transformation



Project Portfolio

a. On-going projects

Development of a Whistleblowing External Reporting Channel

The aim of the project is to develop an online platform designed to encourage employees in the private or public sector to anonymously, securely and confidentially report breaches of EU law.

Greece 2.0
NATIONAL RECOVERY AND RESILIENCE PLAN



**Funded by the
European Union**
NextGenerationEU

**Iceland
Liechtenstein
Norway grants**



Strengthening Integrity, Transparency and Anti-Corruption Framework

The project aims at enhancing the operational capacity of public institutions towards more effective prevention and management of integrity breaches. In particular:

- Mapping national and international practices relating to the identification, disclosure, prevention and management of conflict of interest situations
- Legislation reform proposals, international good practices and tools concerning conflict of interest management
- Development of a web-based training tool to enhance public officials' skills and critical thinking and to design and conduct a survey on the implementation and impact of integrity policies

Enhancing transparency and integrity in public procurement system through an integrated risk management system

The project seeks to advance the integrity, efficiency, and transparency of public procurement in Greece through an integrated risk management system. The initiative encompasses the following key components:

- A risk management framework for public procurement and practical tools for its successful implementation, including a risk register (based on Law 5013/2023), training materials and a workshop
- A risk-based audit methodology in public procurement supported by training materials and workshop(s)
- A code of conduct/ethics to enhance integrity amongst public procurement practitioners



NSRF
2014-2020

Providing consulting services and technical assistance on Strategic Planning and NACAP external evaluation

The project concerns the reshaping of:

- a) the framework, methodologies and tools for the Authority's strategic and operational planning and
- b) the framework for the management of the critical stages of NACAP life cycle



Communication & Awareness Consultant

The scope of the project is the preparation of the NTA Strategic Communication Plan, the formulation of a Communication

Action Plan and the implementation of communication, awareness and promotion actions.

b. New Projects



Funded by the
European Union
NextGenerationEU

- Upgrading the e-Pothen platform and data base for asset declaration
- Development of an Integrated Audit Management System
- Development of a Digital Forensics Lab

2 OPERATIONAL ACTIVITY

2.1. Audits & Investigations



1.362	Investigation Orders
500	Audit Orders (not including audit orders for the protection of public health)
457	COVID-19 & anti-smoking legislation audit orders
21	Systemic audit orders on health service structures & public services
8	Mobbing audit orders
276	Asset declaration audit orders
1.111	Concluded Investigations
704	Audit reports (not including COVID-19 & anti-smoking legislation audit reports)
134	Audit reports with indications of disciplinary and/or criminal liability

Audit scope

120

Audits conducted according to the Annual Audit Plan on:

- Health Institutions and Centres
- Elderly and Child Care Units
- Offices for the Protection of the Rights of Healthcare Recipients
- NGOs
- Camps
- Bodies of Central Administration and Legal Entities of Private Law
- School units
- Bus Companies (KTEL)
- The foreshore¹⁰

28

Audits on Food Service Establishments

22

Audits on licensed children's camps to ascertain the proper functioning, quality and adequacy of the facilities, equipment and services offered therein

16

Audits concerning qualification authenticity verification

15

Audits related to the performance of private work

8

Audits on Elderly Care Units to ascertain the quality and adequacy of the services provided and the living conditions of care receivers as well as the licensing procedures of the units

8

Audits on hospitals of the Greek National Health System, in order to ascertain compliance or non-compliance with the legislation on the protection of the rights of healthcare recipients

8

Audits on NGOs included in the NGO Register of the Ministry of Migration & Asylum

¹⁰ Foreshore audits highlighted issues regarding the protection and utilization of the foreshore-beach that were brought to the attention of the competent ministry, in view of the legislative initiative undertaken for foreshore management and control

In addition to the above, NTA carried out audits and investigations on:

- Public procurement of goods, services and works
- Application of Labour Law and provisions of the Civil Service Code
- Welfare and insurance issues
- Subsidies, grants, national and Community aid
- Residence permits - refoulements
- Leases of public immovable property, allocation of public spaces
- Transport (driving schools - KTEL Bus Companies, vehicle registration permit)
- Built environment and spatial planning (urban planning violations, zoning, land expropriation)
- Environmental issues (protection and management of forests, special conservation habitats, archaeological sites - bioclimatic upgrading of areas - wastewater management)
- Licensing of facilities (wind farms, thermal springs, cycle tracks, sports facilities, private educational establishments, playgrounds)
- Public and private health issues (financial management of hospitals, hospital conditions, management of hospital and pharmaceutical materials, use of stem cells, prescribing and performing medical examinations - issuing medical certificates)
- Operation of educational institutions
- Responding to emergencies and natural disasters
- Management, accounting and financial audits on local authorities, Legal Entities of Public and Private Law
- Asset declaration audits
- Application of disciplinary and criminal law provisions

Asset Declaration Audits

13.820 liable persons from entities falling under the competence of NTA were audited as to their compliance with the obligation to submit a declaration of assets and financial interests.

Unjustified increases in assets amounting to a total of **856.612,71** euros were found in **8** cases.



Results from the exercise of disciplinary competences

- **74** final dismissals, mainly for the offence of unjustified abstention from the performance of official duties
- In **30** cases (**69.7%**) objections and appeals were upheld or a heavier penalty was imposed
- Following objections/ appeals, the penalty of final dismissal was imposed in **3** cases
- **13** objections were rejected. The majority of them concerned cases in which the persons prosecuted were irrevocably acquitted by the criminal courts.

Implementation of Proposals - Recommendations in Audit Reports

85,55% of proposals - recommendations were implemented by the audited entities

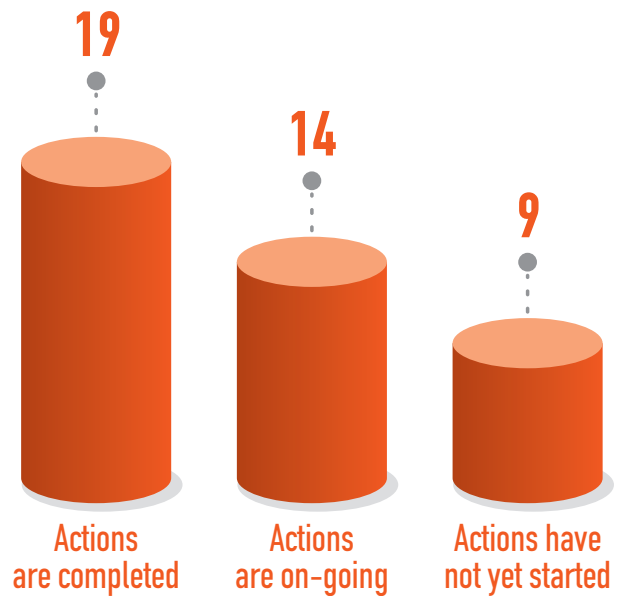
2.2. Strengthening Integrity and Accountability

2.2.1. National Integrity System (NIS)

- An intervention of strategic importance that includes a coherent framework of actions concerning the Public Administration
- Part of the broader framework of the National Anti-Corruption Action Plan (NACAP)
- Main objectives:
 - Prevent corruption in the public administration
 - Strengthen transparency, integrity and accountability
 - Inform and raise awareness among citizens.

NIS is implemented in cooperation with the Ministry of Interior.

As of the end of 2023, out of the 42 actions of NIS 2022-2025:



Integrity Advisor

The Integrity Advisor was established in the Public Administration by Law 4795/2021 to ensure a coherent framework of safeguards and mechanisms that will guide and support public employees in matters of ethics, violation of integrity, maladministration and corruption.

In 2023 the secondary legislation was adopted regulating procedural issues such as the selection of Integrity Advisors, the exercise of his/her responsibilities and the operation and management of the Integrity Advisors registry.

Professional Certification of Integrity Advisors							
Training cycles/ Type of entity	Ministry	Legal Entity of Public Law	Independent Authority	Municipality	Region	Other	Total
1 st cycle (23.1.2023 - 24.2.2023)	6	6	2	3	0	1	18
2 nd cycle (1.3.2023 - 3.4.2023)	0	1	6	4	2	2	15
3 rd cycle (19.06.2023 - 14.07.2023)	0	3	6	4	0	5	18
4 th cycle (16.10.2023 - 10.11.2023)	3	7	2	5	1	0	18
5 th cycle (13.11.2023 - 08.12.2023)	1	6	4	2	0	0	13
Total	10	23	20	18	3	8	82
Certified							67

Source: Data generated and maintained by the NTA

Lobbying

Law 4829/2021 (Government Gazette 166/A¹) regulates the communication of state institutions with interest representatives to ensure integrity and transparency when exercising influence activities. The law provides for the creation of a Transparency Registry, an electronic database recording data and information about lobbying activities. The Registry is managed and maintained by NTA and is available at <https://lobbying.aead.gr>. Natural and legal persons wishing to exercise lobbying activities vis-à-vis third parties have already registered.

2.2.2. Internal Control System

Legislative and other regulatory initiatives

Law 4795/2021 established a solid internal control framework in the public sector in line with international standards to strengthen accountability mechanisms and protect the public sector against maladministration, low productivity and corruption.

The legal framework on internal control was supplemented by the provisions of Law 5013/2023 (Government Gazette 12/A¹) on risk management.

NTA, as the competent authority for the development of the institutional and organisational framework of the national internal control system:

- participated in the preparation and consultation on draft regulatory acts pursuant to Law 4795/2021
- supported the establishment of an Internal Audit Unit in the Ministry of Climate Crisis and Civil Protection
- prepared circulars and instructions on internal audit issues

Internal Audit Units

Internal Audit Units have been established in ministries, independent authorities, universities, decentralised administrations, regional health authorities, regions and municipalities.

NTA provided continuous support through the:

- maintenance and update of the Internal Audit Units Registry
- coordination of the Internal Audit Units

- provision of guidelines and opinions on both institutional and practical issues
- development of standardised documents, tools, templates, standards, methodologies and guides
- preparation of guidelines on Internal Audit Unit Operating Regulations and on the follow up to internal audit recommendations
- implementation of a training programme on internal audit

Tailored internal audit standards and tools were uploaded on the Public Sector Internal Auditors Network¹¹

<https://gpian.aead.gr>

Internal Control System Maturity Assessment Tool

NTA developed a performance ranking scale of the Internal Control System in public sector entities. The tool is based on the COSO Internal Control-Integrated Framework 2013, adapted to meet the needs of the Greek PA.

Based on the findings and proposals recorded (follow up procedure) in the framework of the project "Maturity Assessment of the Internal Financial Management Control System" (2021), the changes and developments in the individual areas of the Internal Financial Management Control System in ministries were identified and assessed.

Professional Certification of Internal Auditors	
Number of trainees by type of entity	
Municipalities & Regions	48
Independent Authorities	25
Ministries	12
Universities	8
Decentralised Administrations	3
Other	37
Total	133
Certified	116

Source: Data generated and maintained by the NTA

¹¹ An active platform for communication and exchange of views among public sector internal auditors with 500 members

2.2.3. Risk Management

The institutional framework for an integrated risk management in the public sector was established by law 5013/2023. The law aims at early identification and management of integrity risks which public entities are exposed to. In addition, it provides for the operation of a Risk Register and a Central Repository of Corruption Risks in the public administration which will serve as a tool to design anti-corruption policies in high-risk areas of corruption.

2.2.4. Whistleblowers Protection

European Directive 2019/1937 was transposed into national law by Law 4990/2022 establishing a comprehensive framework for the protection of persons who, in the context of their professional activities, report breaches of EU law.

In cooperation with the competent ministries, three regulatory acts were adopted concerning:

- The specification of the procedure for the submission, receipt and follow-up of reports to public and private sector bodies (Government Gazette 6944/B¹²)
- The identification and specification of the qualifications, responsibilities, obligations and the procedure for filling the position of the officer Responsible for Receiving and Following up on Reports (RRFR) in public sector bodies (Government Gazette 2561/B¹³)
- The development of the procedure for the transmission of the report to the competent public bodies and the deadline for informing the Authority on the progress of the report (Government Gazette 5044/B¹⁴)

By a circular¹² of the Ministry of Interior, NTA was designated as the competent authority for the monitoring of the compliance of public bodies with the obligation to establish an internal reporting channel.

72 decisions appointing the RRFR have been issued by public sector bodies

Type of entity	Decisions appointing the RRFR
Municipalities	26
Legal Entities of Public and Private Law - Independent Authorities	22
Hospitals - Regional Health Authorities	15
Ministries	5
Decentralised Administrations	2
Universities	2
Total	72

Source: Data generated and maintained by the NTA

NTA Internal Reporting Channel

The NTA internal reporting channel operates on the following link: <https://intwhistle.aead.gr>

The RRFR of the Authority has been appointed by decision¹³ of the NTA Interim Governor.

NTA External Reporting Channel¹⁴

The electronic platform became operational on 11.09.2023 <https://extwhistle.aead.gr>

2.2.5. Protecting the EU's Financial Interests (AFCOS)

NTA is designated by Law 4622/2019 as the Greek Anti-Fraud Coordination Service (AFCOS), in cooperation with the Economic Crime Prosecution Service (SDOE).

In 2023, NTA/AFCOS participated in:

- The Monitoring Committees (MCs) of nine (9) sectoral and thirteen (13) regional programmes of the NSRF for the 2014-2020 and 2021-2027 programming periods
- The MC of the Rural Development Programme (RDP) 2014-2022 and the Strategic Plan of the Common Agricultural Policy 2023-2027

¹² Online Publication Number (OPN): 910K46MTA6-57Q

¹³ Decision No 34811/11.08.2023 (OPN: 6Y6146M10Φ-A3Δ)

¹⁴ The National Transparency Authority, as external reporting channel, in accordance with Article 11 of Law 4990/2022, is the competent authority for receiving, managing and following up on reports submitted directly to it concerning breaches falling within the scope of the law.

- The three (3) programmes of the Migration and Home Affairs Funds and the programmes of the "European Territorial Cooperation" (Interreg) objective
- Two plenary meetings of the Advisory Committee for the Coordination of Fraud Prevention (COCOLAF)
- Twinning Project between Greece and Montenegro: "Improving the capacities of the AFCOS System bodies in the field of irregularities management"
- Transnational project: "Fraud Repression through Education (FRED2)"

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

NTA/AFCOS carried out:

- 25 operations for the coordination of national authorities in supporting 15 OLAF cases through information exchange and the conduct of external or internal investigations.
- Technical meeting with OLAF officials (November 2023) for the further strengthening of cooperation at both coordination and operational level, with the participation of a European Delegated Prosecutor in Greece and members of the Economic Crime Prosecution Service (SDOE).

PIF Report 2023

NTA/AFCOS, in cooperation with all national stakeholders and agencies:

- Submitted to the European Commission a completed questionnaire on the most important measures (legislative, administrative, organisational or operational) taken by the country in the areas of revenue and expenditure of the EU budget in the year 2022.
- Monitored their proper incorporation into the PIF Report, in cooperation with the competent Commission officials.
- Collected and presented to the European Commission the views and opinions of the relevant national services on the recommendations included in last year's PIF Report.

National Anti-Fraud Network - NTA/AFCOS networking platform (<https://AFCOS.aead.gr>)

- An important tool to strengthen communication with the bodies active in the fight against fraud and the protection of EU financial interests
- Continuously updated with informative and educational material
- 110 registered members (members from 36 institutions)
- 133 posts within 2023

2.3. Raising Awareness

34 events - 5.985 participants

- **31 workshops / webinars** on internal audit, risk management, conflict of interest, foreign bribery, strategic planning, women's entrepreneurship and the contribution of audits in social well-being.
- **3rd Integrity Forum**
On the occasion of the International Anti-Corruption Day (9 December), NTA held for the third consecutive year the annual Integrity Forum under the theme: "National Transparency Authority: Speaking with Actions". During the Forum, more than 500 employees from the public and private sector were informed of NTA audit findings, the important synergies developed in the framework of ESOEL and the role of the Authority in asset declaration audits.
- **Thessaloniki International Fair (TIF)**
NTA participated in the 87th TIF to inform the public about its work, mission and activities. In the context of the exhibition, the Authority held a workshop on Whistleblowing and Transparency, during which more than 200 public and private sector employees were informed about:
 - ▶ the international practice of whistleblowing

- its contribution to the fight against corruption
- the role of NTA in the application of Law 4990/2022
- the operation of the whistleblowing platform

- **Student Competition "Integrity Leaders of Tomorrow"**

- aims to raise awareness among the school community of the values of transparency and integrity
- takes place every two years
- The theme of the 2023 Student Competition, was "No to violence, yes to friendship. Block bullying"
- 1.975 students participated with 1.184 artworks from 176 schools throughout the country
- The winning artworks were awarded in a special ceremony co-organised by the NTA and the Hellenic Parliament
- The best 120 artworks were exhibited at the library of the Parliament

Public Opinion Surveys

Two (2) public opinion surveys were conducted on:

- citizens' perceptions on corruption
- NTA's role, mission, and activities

The conclusions served as a useful tool to assess the effectiveness of communication and awareness-raising activities and created a solid database for collecting comparative data.

Radio and digital information campaign - Key message: "National Transparency Authority - Essential to society"

NTA launched a public awareness campaign to:

- promote the mission of the Authority towards changing the mindset and patterns that erode citizens' trust in the state and institutions
- present the innovative tools, methods and standards used by the Authority to further improve control and accountability mechanisms
- highlight the importance of transparency and integrity for the development of the country and society in general

Participation in the 40th Authentic Athens Marathon

For the third consecutive year, the Authority participated with a 20-member team in the five-kilometer (5km) race of the 40th Athens Marathon (November 12). Under the central message "Fighting Corruption - Endurance Race", the team gave its dynamic "presence" to the top sporting event, aiming to highlight the continuous and collective struggle required to combat corruption.

¹⁵ NTA - NACAP_Handbook of good practices in the fight against corruption-DR0723008ENN_1.pdf (aead.gr)

2.4. | National Anti-Corruption Action Plan (NACAP)

The National Anti-Corruption Action Plan (NACAP) is the national strategy to combat and prevent fraud and corruption and promote public integrity. At the same time, it serves as a dynamic tool for coordinating the action of public policy actors, the private sector and civil society in the effort to design, implement, monitor and evaluate horizontal and sectoral anti-corruption actions.

The main objectives of NACAP 2022-2025 are:

- Strengthening citizens' trust in institutions
- Improving Greece's international and European index rankings
- Contributing to the improvement in the investment climate

NACAP 2022-2025 is structured in 3 Parts (Investigation / Control, Prevention, Raising Awareness) each one of which is associated with a Strategic Objective:

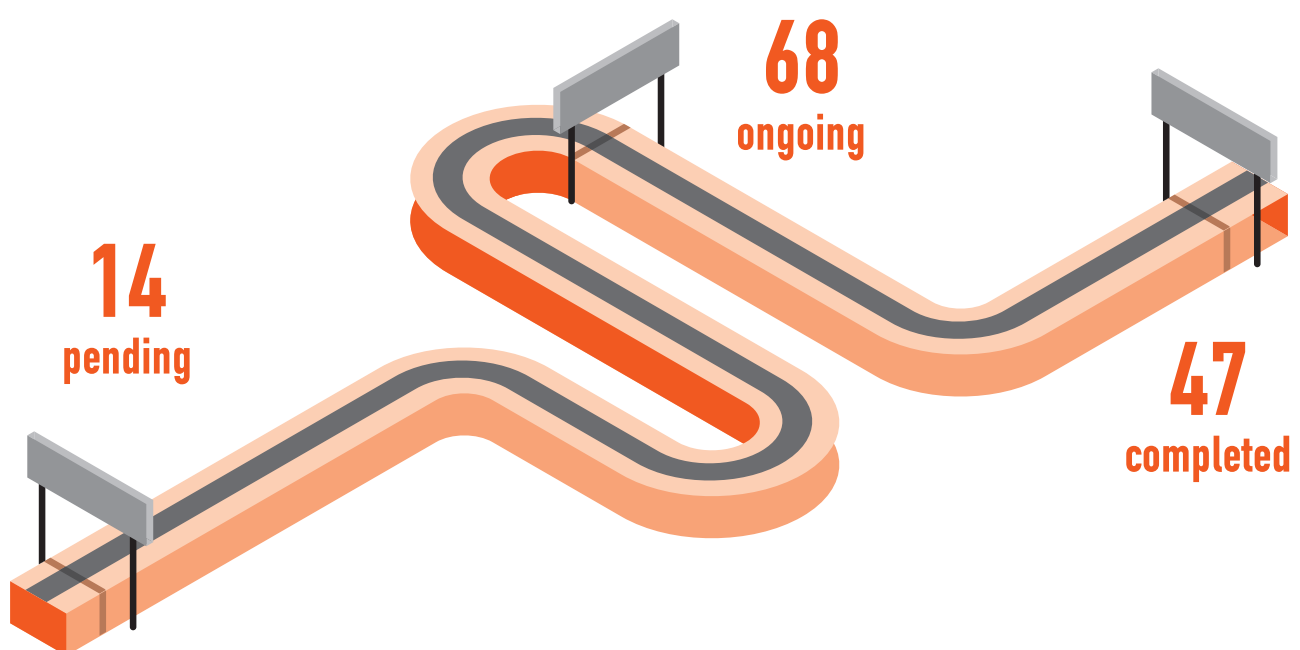
- Enhancing the Audits/ Investigations framework for the combat of fraud and corruption
- Strengthening Integrity, Accountability and Transparency
- Engaging Citizens in the fight against corruption

The Strategic Objectives are further broken down into nine (9) Specific Objectives, within which one hundred and twenty-nine (129) Actions are included.

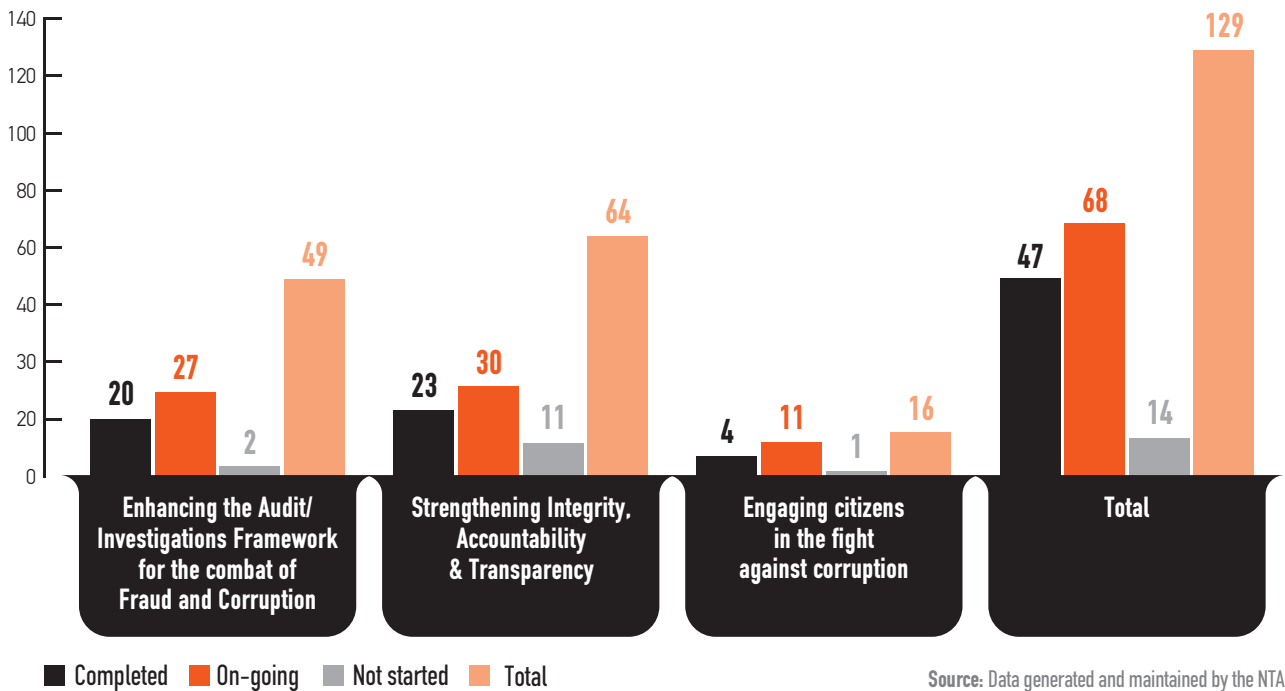
NACAP 2022-2025 Implementation Progress

NACAP implementation progress is monitored through an integrated Management and Evaluation System developed in-house. This mechanism is a European good practice included in the Handbook of good practices in the fight against corruption, a report prepared by the European Commission's Directorate-General Migration and Home Affairs (DG HOME)¹⁵.

According to [NACAP 2022-2025 Implementation Progress Report S2 2023](#), as of the end of 2023 out of the 129 actions:



NACAP 2022-2025 - Implementation progress per Strategic Objective



OECD Public Integrity Indicators - Strategic Framework

Greece ranks

2nd

best (among OECD member countries) in terms of quality of the design and monitoring system of the National Anti-Corruption Strategy

5th

best in terms of the degree of implementation of the Strategy

6th

best in terms of the Strategy's quality

2.5.

National Coordinating Body for Audit and Accountability (ESOEL)

Collective body composed of 17 law enforcement and AC entities at the national level (aprox. 1.615 auditors and investigators)

Main task: promote co-ordination

- Foster synergies/avoid overlaps
- Design joint actions/operations
- Promote inter-agency cooperation
- Disseminate good practices

NTA presides ESOEL

Activities:

- Joint audit missions following public prosecutor's orders
- Exchange of good practices through targeted presentations in the context of ESOEL's regular meetings
- Participation in the 3rd NTA Integrity Forum to communicate the activities of the Body

2.6. | Ethics Committee

The Ethics Committee is set up in the National Transparency Authority by decision of the NTA Governor, as provided for in article 74 of Law 4622/2019, for the purpose of examining any issue concerning ethics and avoidance of conflict of interest of members of the government, deputy ministers, general and special secretaries, public sector administration bodies and political appointees.

In 2023 the Committee examined three post-employment cases involving two senior public officials and one political appointee. The related decisions are available at <https://aead.gr/nta/epitropi-deontologias>

2.7. | Internal Audit

The Internal Audit Directorate performs a crucial function in securing NTA's operations.

- Assurance Engagement
 - Audit of 12 main financial management processes, with more than 190 check points evaluated, based on the NTA's Standard for Internal Financial Control System Processes (2021).
 - Evaluation of 19 thematic modules for their design adequacy, with 239 controls evaluated, using the Cybersecurity Handbook (2021) and the Cybersecurity Self-Assessment Tool for Organisations (2022) of the National Cybersecurity Authority of the Ministry of Digital Governance.
 - Assessment of 7 sectors by examining 32 controls regarding the operator's level of occupational health and safety compliance, using the European Agency for Safety and Health at Work (EU-OSHA) web-based application "OiRA - Online interactive Risk Assessment".

- Examination of all NTA's public procurement contracts.
- Advisory services
 - Submission of proposals for the implementation of projects
 - Participation in training programmes
 - Provision of informative services
- Submission of the 2022 Annual Internal Audit Report with Opinion¹⁶ to the NTA Interim Governor

2.8. | Personal Data Protection

Following the European and national developments in the field of personal data protection and with a view to the compliance of the Authority with the requirements of the General Data Protection Regulation (GDPR), the NTA DPO:

- Updated:
 - General Data Protection Policy
 - Personal Data Breach Management Procedure
 - Record of Processing Activities (RPA)
- Standardised the procedure for the Application of Technical Measures for the Personal Data Protection in the Context of Law 4990/2022"
- Handled one incident of personal data breach
- Delivered two webinars on the application of GDPR provisions to 86 NTA Inspectors-Auditors and administrative staff
- Implemented an induction training programme for newly recruited NTA staff
- Provided an advisory opinion to the NTA organisational units on the processing of personal data
- Participated in the design and development of new electronic applications and information systems aiming at data protection by design
- Monitored the progress of the Data Protection Impact Assessment studies (DPIA) for teleworking in NTA and the Whistleblowers External Reporting Channel
- Carried out staff awareness activities on Personal Data Protection

¹⁶ In application of article 13 of Law 4795/2021 (Government Gazette 62/A)

2.9. | International Presence

NTA remains committed to international cooperation seeking to:

- forge bilateral and multilateral anti-corruption schemes in the field of public integrity
- identify opportunities to further strengthen the operational capacity of Greek audit bodies.

In 2023, the Authority took significant action at the international level participating in international evaluations and representing our country in international conferences and meetings.

2.9.1. | International Evaluations

Progress report on the implementation of recommendations in the context of:

- **Greece's phase 4 WGB Evaluation regarding the implementation of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions:**
 - NTA coordinated the process of collecting documentation and sent a progress report (3/2023 and 11/2023) in cooperation with competent bodies
 - Designed and implemented, in collaboration with the Diplomatic Academy of the Ministry of Foreign Affairs and the Tax & Customs Academy of IAPR, targeted training activities for the Diplomatic Corps and IAPR auditors on the subject of combating the offence of bribery of foreign public officials
- **The fifth evaluation round of Greece by the Group of States Against Corruption (GRECO) for the prevention of corruption in central government bodies:**
 - NTA contributed to the implementation of the recommendations by preparing a Draft Code of Ethics for Political Appointees & Special Advisers and by issuing secondary legislation for the roll out of Integrity Advisors
 - NTA prepared an analytical report on the implementation progress of the recommendations (Part A)

2023 Rule of Law Report

References to Greece's progress:

- Significant improvement in the Transparency

International's CPI 2022 during the last decade

- Seamless implementation of NACAP 2022-2025
- Development of a comprehensive framework for gift policy and lobbying regulation
- Publication of a code of conduct for elected local government officials and a code of ethics and professional conduct for public sector employees
- Progress on the audit of asset declarations with regard to their accuracy
- Implementation of a technical assistance programme to strengthen transparency and integrity through the development of an integrated risk management framework
- Adoption of Law 4990/2022 on whistleblowers protection

2.9.2. | International Partnerships

Participation in Multilateral Networks, Committees, Programmes and Working Groups of International Organisations:

- 10th Conference of States Parties (CoSP10) to the UN Convention against Corruption (Atlanta, 11 - 15.12.2023)



The NTA Interim Governor, Ms. Alexandra Rogkakou, presented the initiatives taken and progress achieved in the field of preventing and fighting corruption since the establishment of the Authority, highlighting the most important institutional reforms such as the National Anti-Corruption Action Plan, the Internal Control framework and the framework for risk management, lobbying and whistleblower protection.



NTA participated in two (2) special events organised by UNODC entitled "Globe International Cooperation Day" and "International Perspectives on Whistleblower Protection" with the participation of representatives of the EU, the US Securities and Exchange Commission and CSOs.

- Meeting of the Council of Europe's Network of Corruption Prevention Authorities (NCPA) (14.11.2023)
- Civil service mobility - STUDY VISIT IN ATHENS, conducted in the framework of the TSI 2023 French PACE Project on "Exchange M6: Ethics and anti-corruption" (Athens 06 - 09.11.2023)
- Meeting of the European Network for Public Ethics (ENPE) (Ljubljana, 4 - 5.10.2023)
- First meeting of the EU network against corruption (Brussels, 20.09.2023),
- 14th Session of the Implementation Review Group of the UN Convention against Corruption (Vienna, 12 - 16.06.2023)
- Conference of the European Lobbying Registrars' Network (ELRN) (Edinburgh, 30 - 31.03.2023)
- International Association of Anti-Corruption Authorities (IAACA):
 - Online training programme (22 - 23.02.2023)
 - 4th meeting of the Executive Committee (Hong Kong, 26.04.2023)
- OECD Working Party of Senior Public Integrity Officials (SPIO)

Bilateral Cooperation

- On the margins of CoSP10 (Atlanta, 11-15.12.2023):
 - Meeting with the Consul of Greece in Atlanta and the CoSP 10 President and US Department of State's Coordinator on Global Anti-Corruption to discuss the structure and functioning of the US anti-corruption agencies and present the relevant policies that have been developed by NTA.
 - Bilateral meetings with counterpart authorities: ICAC of Hong Kong, the French AFA, the Australian Authority (NACC), the Romanian Authority (ANI) and the UAE Supreme Audit Institute for cooperation in the field of whistleblowing reporting, avoidance of conflict of

interest, awareness raising and use of behavioural insights for the prevention of corruption.

- Working session between the NTA Interim Governor and the Deputy Prime Minister of the Government of North Macedonia in charge of Good Governance Policies, Ms Slavica Grekowska on integrity risk management and the prevention of conflicts of interest (Athens, 03.11.2023).
- Exchange of know-how on the avoidance of conflict of interest and the regulation of lobbying activities with the National Integrity Authority of Romania (ANI) and the Romanian Ministry of Justice (Bucharest, 31.01.2023).
- Completion of an 8-month Twinning project aimed at strengthening the AFCOS Office of Montenegro in the field of the fight against fraud. NTA experts evaluated the Montenegro National Anti-Fraud Strategy for the period 2019-2022 making a set of proposals to improve the development and monitoring system of this policy framework.

3 OPERATIONAL PLANNING FOR 2024

**The operational planning for 2024
involves interventions in the
following areas:**

- Audit framework update
- National Integrity System
- Internal Control System
- Corruption Risk Management
- Raising Awareness and Information
- National Anti-Corruption Action Plan
- International Presence
- Human Resources Management
- Employee Skill Development
- Digital Transformation
- Personal Data Protection
- Co-funded/ Technical Assistance Projects
- Operational Goal-Setting



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