

# ANNUAL REPORT 2024



HELLENIC REPUBLIC



NATIONAL TRANSPARENCY AUTHORITY



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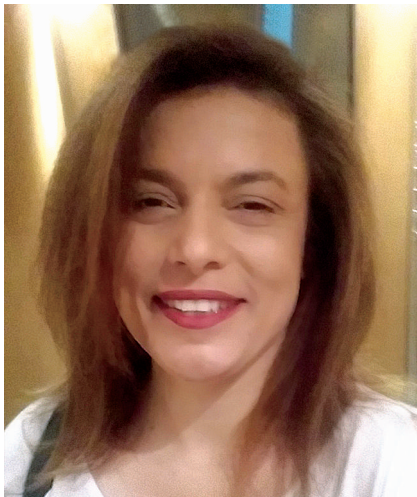
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# ACRONYMS ABBREVIATIONS

AFA	Anti-Corruption Agency of the French Republic
AFCOS	Anti-Fraud Coordination Service
AI	Artificial Intelligence
ANAC	Italian National Anti-Corruption Authority
ANI	National Integrity Agency of Romania
CGU	Comptroller General of the Union
COCOLAF	Advisory Committee for the Coordination of Fraud Prevention
CPI	Corruption Perceptions Index
CPIB	Corrupt Practices Investigation Bureau
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
IAACA	International Association of Anti-Corruption Authorities
IAPR	Independent Authority for Public Revenue
ICAC	Independent Commission Against Corruption of Hong Kong
NACAP	National Anti-Corruption Action Plan
NACC	National Anti-Corruption Commission of Australia
NCPA	Network of Corruption Prevention Authorities
NIS	National Integrity System
NTA	National Transparency Authority
OECD	Organisation for Economic Co-operation and Development
OLAF	European Anti-Fraud Office
OPN	Online Publication Number
PCGG	Presidential Commission on Good Government
PMO	Project Management Office
RRF	Recovery and Resilience Facility
RRFR	Responsible for Receiving and Following-up of Reports
SDOE	Economic Crime Prosecutions Service
SMART	Specific, Measurable, Attainable, Relevant, Time-bound
TIF	Thessaloniki International Fair
TSI	Technical Support Instrument
UN	United Nations
UNODC	United Nations Office on Drugs and Crime



## Governor's Message

NTA Interim Governor

Alexandra Rogkakou

2024 was a year of significant achievements and innovative initiatives. To improve public administration, we intensified our investigative work through a series of ad-hoc and systemic audit missions in high-risk areas. Audits are a critical tool for detecting fraud and corruption as well as a means to improve integrity safeguards and promote transparency and accountability.

In the prevention pillar, NTA put emphasis on internal control, risk management and the institutionalization of a network of Integrity Advisors, to foster integrity across the Greek public sector. Furthermore, we updated the National Anti-Corruption Strategy 2022-2025, to incorporate actions of significant added value for the domestic anti-corruption discourse and forged new co-operation partnerships with external stakeholders from the private sector and the civil society.

NTA's re-election in the Executive Committee of the International Association of Anti-Corruption Authorities (IAACA) and the growth of bilateral and multilateral collaborations underline our robust commitment to promote peer to peer dialogue on a global scale. To this path, NTA organised in cooperation with ICAC Hong-Kong and HKIAAC, the first Anti-Corruption Summer Academy, to exchange know-how with globally accredited experts and strengthen the operational capacity of anti-graft fighters in Greece.

We launched the 3rd Student Competition "Youth talks about corruption and ways to deal with it". Raising awareness among young people is an investment for the future and the foundation for building a culture of zero-tolerance against corruption.

All of the above would not have been accomplished without the dedication and professionalism of the Authority's staff, the trust of citizens and the cooperation of all stakeholders. I warmly thank them and I assure them that we will continue with the same determination in 2025.

Enhancing transparency and curbing corruption is a never-ending challenge that requires unwavering vigilance. In NTA we remain committed to promote transparency, integrity and accountability as prevailing values in the Greek society.



## Chairman's Message

## Chairman of the Management Board

# Paraskevas Nomikos

In 2024, the National Transparency Authority continued its rich and multipronged work, carrying out significant and numerous investigations and audits across a variety of bodies and agencies, with the aim of detecting and combating corruption, fraud and maladministration, as well as improving their effective and orderly functioning. At the same time, the Authority took important steps to further develop and improve prevention, integrity and accountability policies and actions, as well as to establish the internal control system in the Public Administration. In addition, the NTA continued and further developed its public awareness-raising and information activities on integrity, accountability, transparency and anti-corruption.

The Management Board of the NTA, with a firm commitment to serving the Authority's mission, exercised its approval and advisory responsibilities in 2024, approving the operational goal-setting for 2024 and the draft budget for 2025, and delivering its opinion on issues of redistribution of posts between the Authority's organisational units as well as on matters relating to the employment status of personnel.

The past year marked a significant change in the composition of the Board, since, following the completion of the term of office of four of its five members, the Chairman and three members were appointed for a five-year term in October, after approval by the Parliament's Committee on Institutions and Transparency. The Board, in its new composition, in which I have the honour to participate as Chairman, was informed in detail about the work of the NTA, its Strategic Plan, the work of its General Directorates and their Departments, the Directorates of the Inspections and Audits Unit and the Regional Directorates.

As Chairman of the Management Board, I wish to commend and praise the tireless work, for the year 2024, of all the NTA staff, inspectors-auditors and administrative employees, and their dedicated commitment to its strategic objectives. I also wish to warmly thank all the members of the Board and its special associate for their valuable contribution to the effective exercise of the Board's competences, with a view to further strengthening the Authority in the achievement of its high mission.







# Introduction

The Annual Report of the National Transparency Authority for 2024 is the sixth report since the establishment of the Authority and presents all its work in the reporting year, as well as the actions included in its operational planning for 2025. Its preparation is provided for in Article 85(5) of Law 4622/2019 and is a key tool for accountability and control. It is submitted by the Governor of the NTA to the President of Parliament and to the Committee on Institutions and Transparency. It is published by the National Printing House and posted on the Authority's website.

In 2024, the NTA implemented actions and projects in its three main operational pillars (Audit - Prevention - Awareness raising), with the aim of enhancing the effectiveness of audit work, strengthening integrity and accountability safeguards in public administration and raising awareness of corruption among citizens and businesses. At the same time, it coordinated the implementation of the National Anti-Corruption Action Plan and leveraged resources from the Recovery and Resilience Facility (RRF) to modernise its operation, improve existing and develop new digital services.

# 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

●●●●●●●●●●●●●●●●

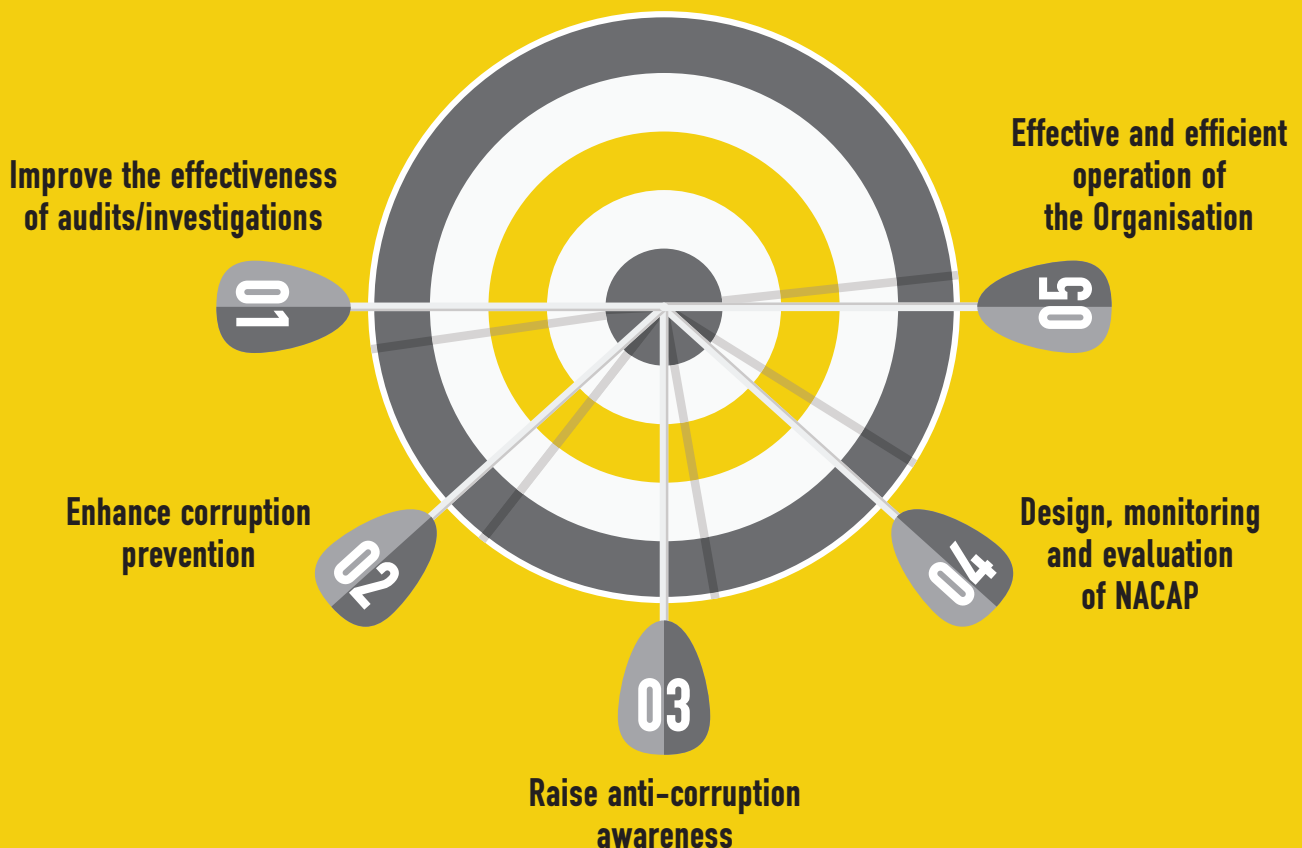
Develop internal audit standards, codes of ethics/conduct, conflict of Interest, sectorial anti-corruption strategies et.al.

### RAISING AWARENESS

●●●●●●●●●●●●●●●●

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

## Strategic Objectives



# 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

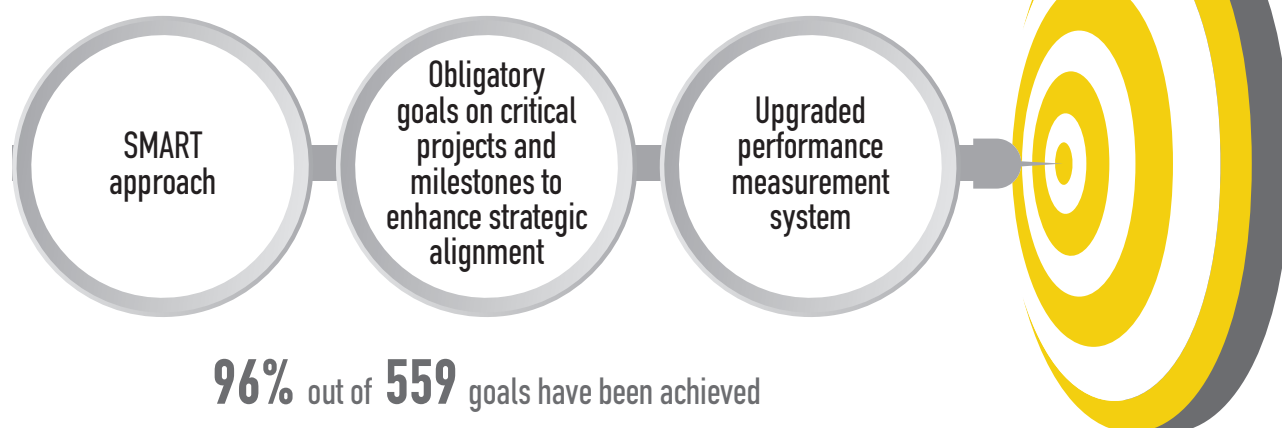


The Strategic Plan 2023–2027 is available at:



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

## Operational Goal-Setting



## New responsibilities

Through recent provisions NTA acquired new competencies in the following areas:

### • Whistleblowing

Article 20 of Law 5095/2024 (Government Gazette 40/A') extended the scope of Law 4990/2022. Accordingly, NTA acting as the external whistleblowers channel acquired the competence to receive, handle and follow up on reports concerning breaches of domestic law relating to bribery and influence peddling offences.

### • Inter-agency cooperation

Presidential Decree 29/2024 (Government Gazette 14/A') established the cooperation of the NTA with the Directorate for Combating Organised Crime (DAOE)

# Human Resources & Staff Development



518 positions (72,4% of the posts are filled by 31.12.2024)

91% highly skilled personnel

Inhouse training

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

## Financial Management

Annual budget: over 9 million euros

Development of cost reduction policies

Budget Allocation	
MC 21 - Wages and Benefits	6.173.406 €
MC 24 - Purchases of Goods and Services	2.872.198 €
MC 31 - Fixed Assets	204.000 €
TOTAL	9.249.604€

Source: NTA

## Digital Transformation

Applications and technical equipment upgrades to facilitate:

- Statistics/Data Collection:



AFCOS complaints  
<https://afcos.aead.gr>



Disciplinary procedures (e-Peitharxika)  
<https://e-peitharxika.aead.gr>

Development of applications, systems and tools



Ethics Committee complaint form  
<https://aead.gr/complaints-deontologia>



Platform for reporting violations of anti-smoking legislation  
<https://1142.aead.gr>



New website for the National Co-ordination Body for Audits (ESOEL)  
<https://esoel.aead.gr>



# Project Portfolio

**Greece 2.0**  
NATIONAL RECOVERY AND RESILIENCE PLAN



**Funded by the  
European Union**  
NextGenerationEU

A

## Recovery and Resilience Facility (RRF)

Project Aim

Development of an Integrated  
Audit Management System  
and AI tool<sup>1</sup>

Improve the effectiveness and efficiency of audit work through the development of a comprehensive IMS including AI applications

Budget: 1.380.120,00 €

Digital Forensics Lab

Comprehensive digital forensics framework to collect and process digital data while maintaining evidence integrity and produce audit solid reports admissible in court

Budget: 479.384,00 €

Information Security Management  
System - ISO 27001

Develop an Integrated ISMS to protect the confidentiality, integrity and availability of information

Budget: 86.260,60 €

Communication & Awareness

Design and implement a targeted communication campaign to raise awareness among citizens and businesses on anti-corruption issues

Budget: 910.494,80 €

Public Sector Internal Control System Platform

Develop digital tool to coordinate and support the Internal Auditors Network and monitor the roll out of the Internal Control System

Budget: 37.200,00 €

<sup>1</sup> The project is implemented in the framework of a Programme Agreement between the NTA and the Information Society S.A.

# Iceland Liechtenstein Norway grants

**B****EEA Grants Financial Mechanism 2014–2021****Project Deliverables**

The project "Strengthening Integrity, Transparency and Anti-Corruption Framework" was completed in cooperation with the OECD.

Report mapping national and international practices for the prevention and management of conflicts of interest

Report with legislative proposals, good practices and tools for the prevention and management of conflicts of interest

16 Webinars on key integrity issues including ethical dilemmas

Survey to measure the implementation and impact of integrity policies on public servants

**C****Technical Support Instrument (TSI) 2024****Project Deliverables**

In cooperation with the OECD, the Hellenic Single Public Procurement Authority and the General Secretariat of Commerce

Integrated risk assessment and risk management framework for public procurement

Standardised Risk Register

Three guidance tools on:  
a) the stages of market and needs analysis and  
b) integrity breaches in public procurement

Draft Code of Conduct for procurement officers

A series of tailored training programmes:  
• Train the trainers in the risk management framework  
• Training on the Draft Code of Conduct

# 2. OPERATIONAL ACTIVITY

## 2.1. Audits & Investigations



### 1.160 Investigation Orders

**763** Audit Orders (not including audit orders for the protection of public health)

**309** Asset declaration audit orders

**447** Anti-Smoking legislation audit orders

**117** Systemic audit orders on health service structures & public services

**927** Concluded Investigations

**727** Audit reports (not including anti-smoking legislation audit reports)

**119** Audit reports with indications of disciplinary and/or criminal liability



## Audit scope

➤	Public procurement
➤	Subsidies, grants, national and Community aid
➤	Welfare benefit allocations
➤	Public and private health issues (hospitalisation conditions, pharmaceutical materials, prescription and conduct of medical examinations – issuance of medical certificates)
➤	Leases of public immovable property, allocation of public spaces, shoreline use
➤	Licensing and operation of facilities (nursery schools, ski centers, petrol stations, sports facilities, private educational establishments, elderly care units)
➤	Transport (driving schools – KTEL Bus Companies, issuance of vehicle registration certificates)
➤	Environmental and animal protection (protection of natural and cultural environment, animal welfare)
➤	Responding to emergencies and natural disasters
➤	NGO Register
➤	Management, accounting and financial audits on local authorities and Legal Entities of Public and Private Law
➤	Asset declaration audits
➤	Application of Labour Law and provisions of the Civil Service Code
➤	Application of disciplinary and criminal law provisions

## Audit reports in critical areas

9	systemic audits on the legality of school trip procedures
7	systemic audits in municipal cinemas
5	systemic audits on municipal record transfer
2	systemic audits on pushbacks
29	audits on building permits and urban planning
15	audits on Mobbing

## ► 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

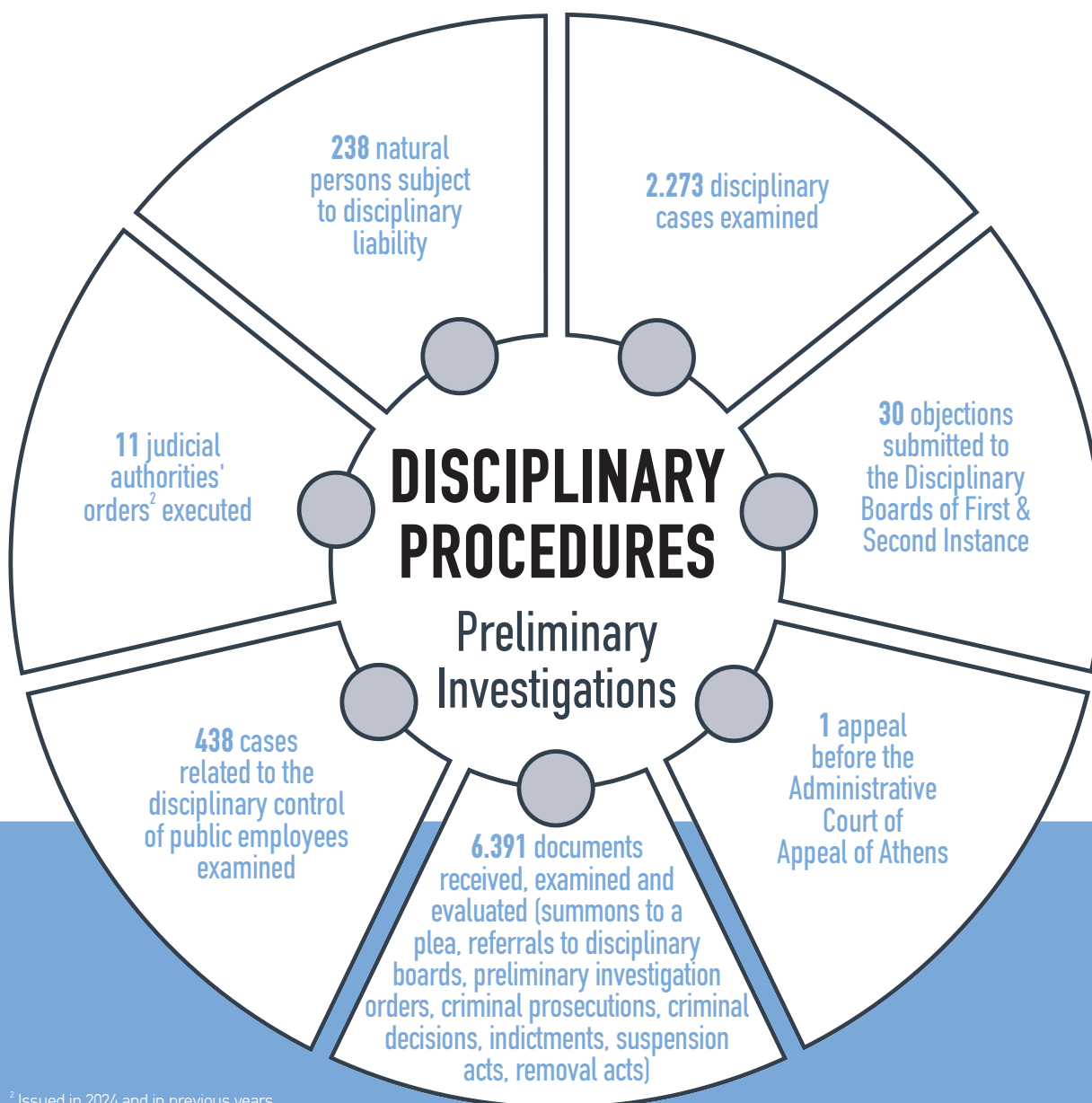
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cases with unjustified increases in assets were found

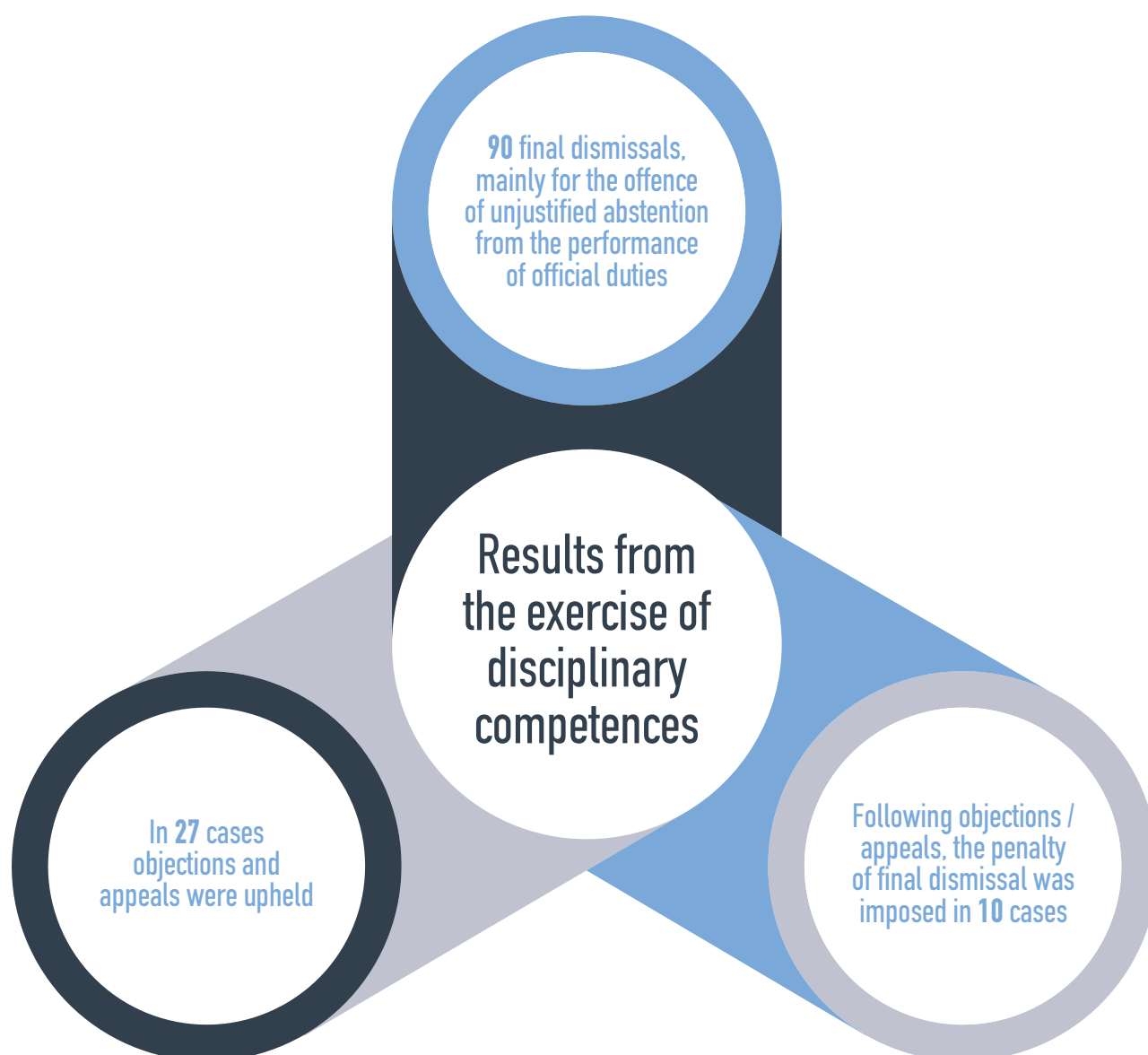
## ► Implementation of Proposals – Recommendations in Audit Reports

74,09%

of proposals – recommendations were implemented by the audited entities



<sup>2</sup> Issued in 2024 and in previous years



## 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. According to the provision of said Law, NTA was designated as the external reporting channel for whistleblowers and as the competent authority for monitoring compliance in the public sector.

Type of entity	Decisions appointing the RRFR
Hospitals - Regional Health Authorities	74
Municipalities	42
Legal Entities of Public and Private Law - Independent Authorities	40
Ministries	7
Decentralised Administrations	4
Regions	3
Universities	2
<b>Total</b>	<b>172</b>

Source: NTA

## NTA Internal Reporting Channel

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

## NTA External Reporting Channel<sup>3</sup>

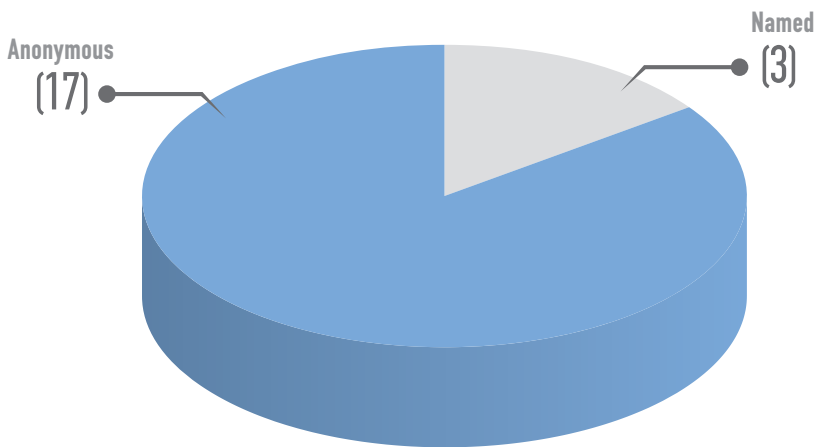
The electronic platform became operational on 11.09.2023 <https://extwhistle.aead.gr>

Out of 82 reports submitted to the NTA, 20 were examined as to whether they fall within the scope of Law 4990/2022 and were categorised as follows:

Whistleblowing Reports	
Investigated	5
Forwarded to other bodies <sup>4</sup>	2
Archived	13
Total	20

Source: NTA

### The majority (85%) of reports were anonymous



## 2.2. Strengthening Integrity and Accountability

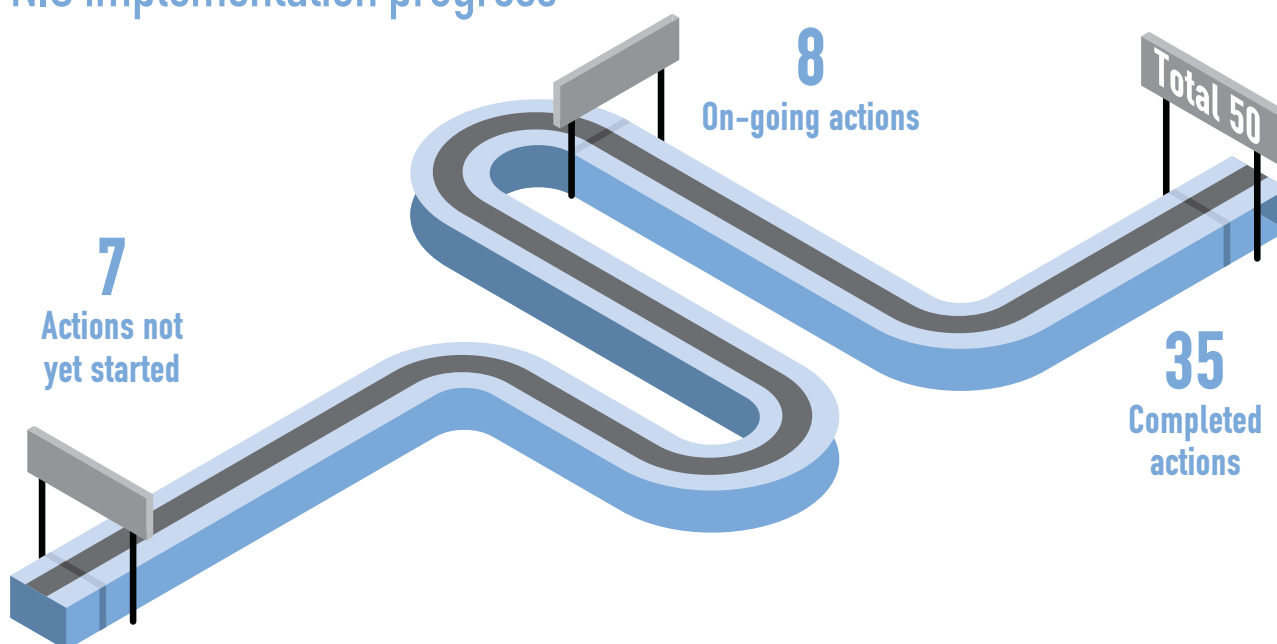
### 2.2.1. National Integrity System (NIS) 2022–2025

- A comprehensive intervention to strengthen integrity safeguards in the Greek Public Administration
- NIS is implemented in cooperation with the Ministry of Interior. Monitoring takes place in the 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.

<sup>3</sup> 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.

<sup>4</sup> To the Hellenic Data Protection Authority and the IAPR Directorate of Internal Affairs (DESYP)

## NIS implementation progress



### 2.2.2. Integrity Advisor

The Integrity Advisor is responsible to ensure the effective protection of employees who observe, suffer the consequences of or wish to report integrity violations, as well as to provide support, information and advice on ethical and integrity issues in their workplace. The Integrity Advisor seeks to strengthen integrity and transparency mechanisms and ensure whistleblowers protection.

- A Call for expressions of interest was published in May to fill the posts of Integrity Advisors in ministries according to Article 23(1) (a) of Law 4795/2021. The selection procedure will be completed in the first half of 2025.
- The NTA issued an opinion on the establishment of Independent Integrity Advisor Offices in the Hellenic Agricultural Organisation - DIMITRA, the Decentralised Administration of Attica and the Municipalities of Athens, Ioannina, Nea Propontida and Hersonissos
- A Practical Guide to Integrity Advisor Procedures was published in December
- 69 Integrity Advisors received professional certification

#### Professional Certification of Integrity Advisors

##### Number of trainees by type of entity

Ministries	23
Legal Entities of Public Law	20
Independent Authorities	12
Municipalities	12
Regions	6
Decentralised Administration	4
<b>Total</b>	<b>77</b>
<b>Certified</b>	<b>69</b>

Source: NTA

### 2.2.3. Codes of Ethics & Professional Conduct

- Code of Ethics for Integrity Advisors
- Code of Ethics for political appointees and special advisers
- Code of Ethics for public procurement professionals

2.2.4. Lobbying

In the context of Law 4829/2021 (Government Gazette 166/A'), the NTA hosts and manages the Transparency Registry, an electronic database on lobbying activities. Annual declarations on lobbying activities exercised from 01.01.2023 to 31.12.2023 were submitted by:

- interest representatives in January 2024
- lobbying recipients in May 2024

The Annual Report 2023 (year of reference 2022) on the operation of the Transparency Registry is posted on the Registry's platform.

2.2.5. Internal Control System  
Legislative & 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 establish robust anti-corruption safeguards.

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

NTA is the competent authority for the development of the institutional and organisational framework of the national internal control system.

In 2024 the NTA:

- Issued a joint decision with the Ministry of Interior (Government Gazette 4634/B') laying down the Standard for the Code of Ethics of Internal Auditors, according to Articles 12 and 79(10) of Law 4795/2021.
- Delivered its opinion on the adoption of a decision regarding the conditions and criteria related to the establishment of Internal Audit Units in bodies supervised by the Ministry of Labour and Social Affairs that fall under the scope of application of Law 4795/2021, Part A.

Activities to support and monitor the work of Public Sector Internal Audit Units

- Update the Internal Audit Units Registry
- Coordination and guidance of the Internal Audit Units
- Provide guidelines and opinions on the application of the Internal Control System

- Draft Standards for Audit Committee Rules of Procedure by category of public entity (Independent Authorities, Regional Health Authorities, Higher Education Institutions)
- Webinars for the members of the Internal Auditors Network (<https://gpian.aead.gr>):
  - Internal Auditors subject to declaration of assets and financial interests (29.11.2024)
  - Code of Ethics of Internal Auditors. Interpretation and application of the new Standard (17.12.2024)
- Develop methodological tools to monitor and assess the operations of Internal Audit Units
- Report on the implementation of the Internal Control System and the operation of the Internal Audit Units, the degree of compliance as well as findings and recommendations.

Professional Certification of Internal Auditors	
Number of trainees by type of entity	
Municipalities & Regions	38
Independent Authorities	19
Ministries	9
Universities	6
Other	36
Total	108
Certified	100

Source: NTA

2.2.6. Risk Management

Law 5013/2023 established a comprehensive risk management framework in the Greek public sector. The law aims at the early identification and rigorous management of integrity risks. Furthermore, it provides for a Risk Register and a Central Repository of Corruption Risks which will serve as a tool to design data-informed anti-corruption policies.

In 2024, the NTA:

- Issued a joint decision with the Ministry of Interior setting the Risk Management Bodies' Annual Report Standard.

- Prepared the Risk Management Policy and Framework Standard aiming at the uniform application of risk management operations in the public sector. The Standard includes mandatory provisions, such as risk categories, assessment and ranking scales, and has been posted on the Authority's website (<https://aead.gr/publications/manuals/protipo-politikis-kai-plaisio-diaxeirisis-kindinou>)
- Drafted guidelines & a Risk Register Standard
- Delivered 2 workshops
- Drafted 2 Reports on combating corruption in public hospitals and in customs administration

Professional Certification of Risk Managers	
Number of trainees by type of entity	
Independent Authorities	19
Ministries	10
Decentralised Administrations	1
Other	15
<b>Total</b>	<b>45</b>
Certified	35

Source: NTA

#### NTA's Risk Management Team is responsible for designing and implementing risk management policy and framework within the NTA

- Activities in 2024:
  - Developed the NTA Risk Management Policy & Framework
  - Prepared the Annual Activity Report
  - Organised a workshop to identify and record the NTA's strategic risks
  - Prepared informational material on risk management
  - Drafted a questionnaire for the creation of an incident log
  - Participated in the Risk Managers Professional Certification Programme of the National Centre for Public Administration & Local Government

### 2.2.7. 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 Prosecutions Service (SDOE).

In 2024, the NTA/AFCOS participated in:

- The Monitoring Committees (MCs) of:
  - 7 sectoral and 9 regional programmes of the NSRF for the 2014-2020 and 2021-2027 programming periods
  - the 2023-2027 Common Agricultural Policy Strategic Plan programmes
  - 3 programmes of the Migration and Home Affairs Funds
  - the programmes of the "European Territorial Cooperation" (Interreg) objective
- 2 plenary meetings of the Advisory Committee for the Coordination of Fraud Prevention (COCOLAF)
- The "Fraud Repression through Education (FRED2)" transnational project

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

The NTA/AFCOS carried out 35 operations for the coordination of national authorities' cooperation and information exchange in 21 OLAF cases before, during or after the external or internal investigation, with the aim of protecting the EU financial interests.

### PIF Report 2024

The NTA/AFCOS, in cooperation with all national stakeholders and agencies, completed and submitted to the European Commission the PIF questionnaire notifying the most important measures (legislative, administrative, organisational or operational) taken by the country in 2023 to protect the EU financial interests, and contributed to their incorporation into the 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
- Hosted on the Authority's Intranet
- Systematically updated with informative and educational material
- 143 registered members (officials from 58 institutions)
- 58 posts within 2024

## 2.3. Raising Awareness

### 14 events 5.879 participants

Conferences, workshops/webinars, capacity building programmes on internal audit, conflict of interest, public procurement, mobbing, foreign bribery, forensics investigation, protection of the EU's Financial Interests and personal data protection.

#### 4<sup>th</sup> Integrity Forum on "Mobbing: Harassment in the Public Sector"

Held on the occasion of the International Anti-Corruption Day (9 December), the Forum focused on the role and responsibilities of the NTA vis-a-vis mobbing complaint management and investigation, as well as the prevention mechanisms, reporting channels and best practices in the public and private sector.



#### National Student Creativity 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 3rd Student Competition, announced in 2024, is "Young people talk about corruption and ways to deal with it"
- High-school students from all over the country are eligible to participate in writing and speech contests



#### Thessaloniki International Fair (TIF)

The NTA participated in the 88<sup>th</sup> TIF in order to inform visitors about its mission and competencies in the fight against corruption.



#### Public Opinion Survey on citizens' and public employees' perceptions on corruption

The Survey was conducted under RRF funding with the aim to:

- collect quantitative and qualitative data on the progress of corruption and public policy making
- evaluate the effectiveness of NTA interventions in prevention and awareness raising
- increase the Authority's visibility among the general population and specific audience groups

#### Participation in the 41<sup>st</sup> Authentic Athens Marathon

Focusing on promoting positive health models, the Authority participated in the 41<sup>st</sup> Authentic Marathon with a 20-member team. With the central message "IN THE RACE for TRANSPARENCY, EVERY STEP COUNTS," its staff sent a strong message of integrity, perseverance, and teamwork, proving that every effort, every small or big step -whether in sports or in the fight against corruption- has value and leaves a positive mark.





## 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.

### 2.4.1. NACAP 2022-2025 update

Completed in 2024 and approved by the Council of Ministers, NACAP 2022-2025 update achieved the following:

- Integration of all NIS actions
- Addition of new high value-adding actions
- Modification of specific elements of existing actions

The updated NACAP 2022-2025 includes 148 actions

### 2.4.2. Implementation Progress

NACAP implementation progress is monitored through an integrated Management and Evaluation System developed in-house which uses a series of Output Indicators to report on the results produced. 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).

During the period 2022-2024, out of the 148 actions:

- 81 have been completed
- 57 are in progress
- 10 have not yet started

#### NACAP 2022-2025 - Implementation progress per Strategic Objective



Source: NTA

### 2.4.3. Interim evaluation

At the end of the first half of 2024, the NTA conducted the NACAP 2022-2025 interim evaluation.

The main conclusions were as follows:

- The strategic priorities of the Plan are assessed as clear, understandable and linked to contemporary challenges and recommendations
- Participants perceive the inclusion in NACAP of actions linked to the strategic priorities of policy making bodies, as reflected in the Annual Action Plans and sectoral strategies, as a particularly positive implementation

component

- The often complex administrative procedures and the understaffing of agencies are recognised as being the most significant delay factors
- The monitoring mechanism is assessed positively, with room for improvement, particularly with regard to the functionality of the electronic reporting platform

The findings will feed into NACAP 2022-2025 external evaluation by an independent evaluator and will be used for the design and preparation of NACAP 2026-2030.

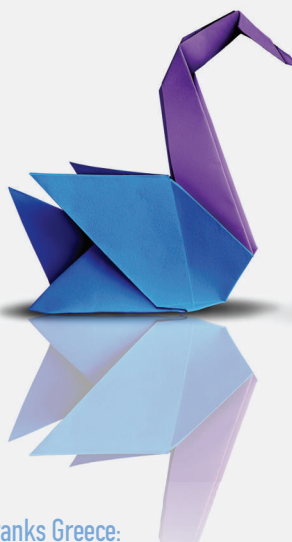
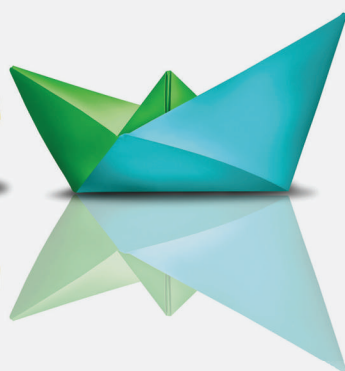
### 2.4.4. Results at European and international level



#### Anti-Corruption and Integrity Outlook 2024



OECD



1. The OECD report "Anti-corruption and Integrity Outlook 2024" ranks Greece:

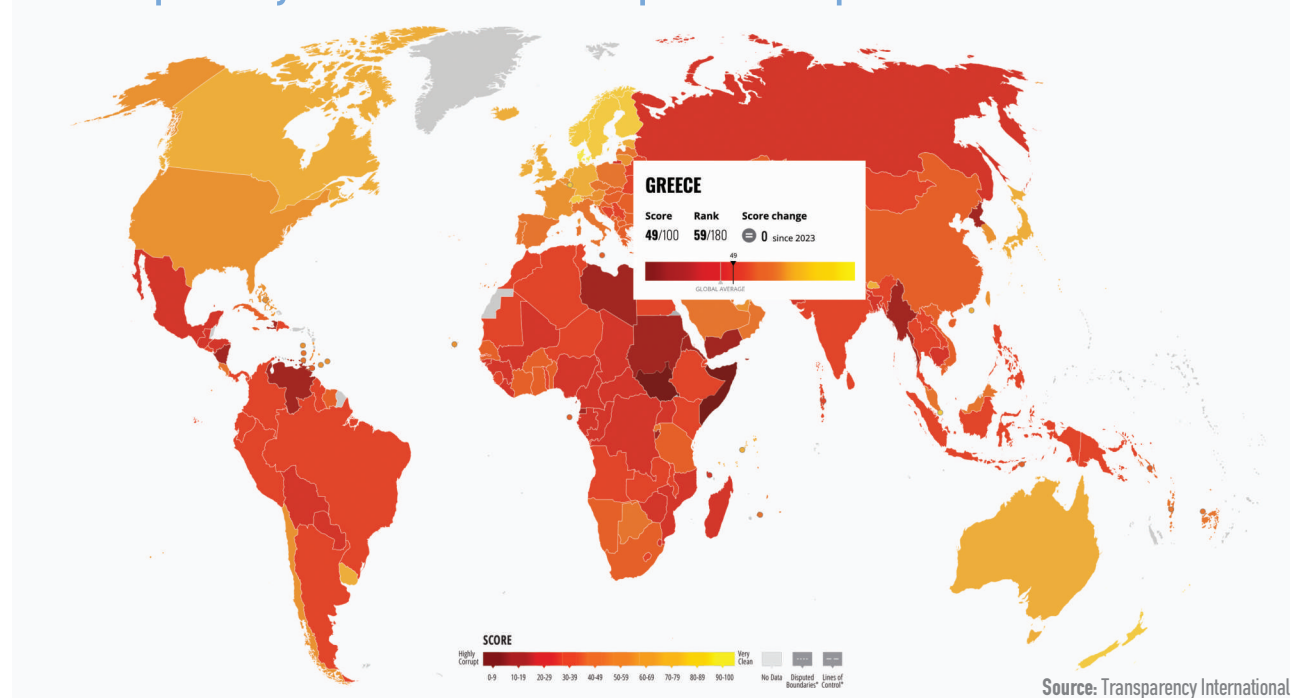
- 2<sup>nd</sup> best in terms of quality of the design and monitoring system of the National Anti-Corruption Strategy
- 5<sup>th</sup> best in terms of the Strategy's implementation degree

Special mention is made of the fact that the National Anti-Corruption Action Plan is approved at the highest political level (Council of Ministers) on the basis of a relevant institutional provision.

2. The OECD Working Group on Bribery acknowledges in its supplementary report that the NACAP includes important actions relating to institutional interventions with added value for the prevention and detection of corruption offences.

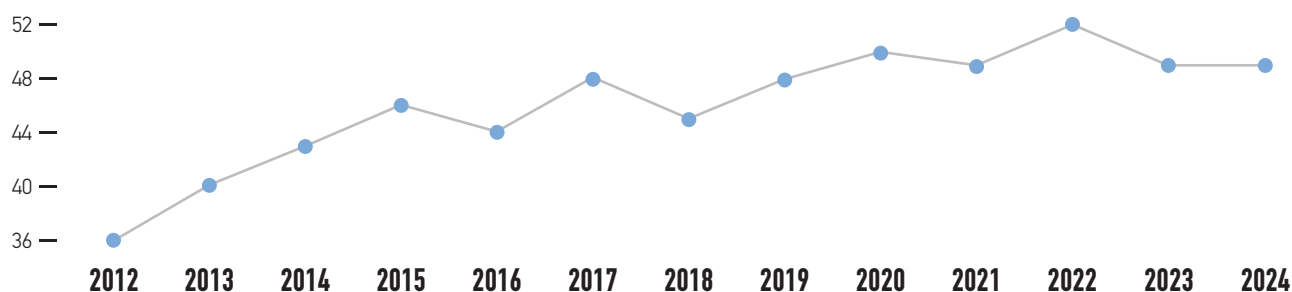
3. The European Commission's annual report on the Rule of Law (RoL) acknowledges smooth implementation and highlights key actions on public integrity included in the 2022-2025 NACAP.

## ► Transparency International Corruption Perceptions Index (CPI)



Greece ranks 59<sup>th</sup> worldwide, according to Transparency International's Corruption Perceptions Index (CPI), and its score is among the top 33% worldwide.

## CORRUPTION PERCEPTIONS INDEX



► TI considers GR a Significant Improver

► GR score is among the top 33% worldwide

## 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:

1. Two Joint Audit Teams were set up to investigate high visibility cases.
2. The audit missions conducted by Joint Audit Teams following public prosecutor's orders were completed
3. ESOEL members participated in the following NTA training programs:
  - Summer Academy on modern techniques for preventing and investigating fraud and corruption, organised in collaboration with the Independent Commission Against Corruption of Hong Kong (ICAC) and the Hong Kong International Academy Against Corruption (HKIAAC) (see subsection 2.9.2.)
  - In-house training seminars on specific topics related to the fight against corruption

## 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 2024 the Committee examined eight (8) post-employment cases involving persons falling into the categories listed in Article 68(1) and 76 of Law 4622/2019, i.e. a former member of the Government, a former Secretary General of a Ministry, a former Vice-President of a legal entity under public law selected by the Government and political appointees.

## 2.7. Internal Audit

### Assurance Services:

- Assessment of key risks related to the operation of the performance management system, and identification and evaluation of risk mitigation measures to enhance the strategic function of the NTA
- Evaluation of major risks associated with the audit of Asset Declarations and Declarations of Financial Interests submitted annually by public employees, including an assessment of the design of the audit process in light of future challenges.
- Completion of monitoring and evaluation of the implementation and effectiveness of internal audit recommendations regarding the management and assessment system for complaints submitted to the NTA.
- Submission of the 2023 Annual Report with Opinion to the Interim Governor, with regard to the effectiveness of governance, risk management and internal control processes of the NTA

### Advisory Services:

- Advisory proposals to the Directorate for Strategic Planning and Behavioural Analysis, focusing on the methodology adopted in managing NTA projects
- Participation in a workshop for identifying strategic risks organised by the NTA's Risk Management Team
- Feedback on a Risk Register related to public procurement, developed jointly by the National Transparency Authority, the Directorate-General for Structural Reform Support (DG REFORM) of the European Commission, and the Organisation for Economic Co-operation and Development (OECD)

## 2.8. 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:

- Handled incidents of personal data breach, in cooperation

with the data breach response team, as well as requests to exercise data subject rights

- Prepared the following:
  - Procedure for Updating the Record of Processing Activities
  - New data protection policy for the antismoking violations complaints platform (1142.aead.gr)
- Updated:
  - Existing data protection policies
  - Teleworking policy
  - Record of personal data processing activities
  - Material on personal data protection posted on the NTA Intranet
- Provided an advisory opinion to the NTA organisational units on the processing of personal data with regard to public procurement, information security, preparation of Data Protection Impact Assessment studies (DPIA) and draft joint ministerial decisions, questionnaire design at polls.aead.gr, development of new electronic applications and information systems aiming at data protection by-design
- Training activities:
  - Workshop on the implementation of technical security measures for personal data in the context of whistleblowing reports handling in the NTA (January 15, 2024)
  - Webinar on: "Audit Procedure and Personal Data Protection (GDPR)", with speakers from the Hellenic Data Protection Authority (HDPa), the Independent Authority for Public Revenue (IAPR), the Cybercrime Division of the Hellenic Police, as well as officials from the NTA Data Protection Office and the Inspections and Audits Unit, which was attended by more than 600 public and private sector officials (April 24, 2024)
  - Webinar on specific GDPR issues, attended by 57 inspectors-auditors, administrative staff and officials from other ESOEL bodies (December 4, 2024)
  - Staff awareness activities on personal data protection
- Participated in the 26<sup>th</sup> Greek ICT Forum (Zappeion Megaron, 06-07.03.2024)  
Presentation topic: "The contribution of the DPO to the protection of personal data in digital environments"

## 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 2024, 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

**Phase 4 WGB Evaluation regarding the implementation of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions - Implementation Report:**



Greece fully implemented 23 out of 49 OECD recommendations.

15 recommendations were partially implemented.

Most significant developments:

- Establishment of legal persons' criminal liability
- Extension of whistleblower protection scope to cover bribery offences
- Amendment of the Code of Criminal Procedure to strengthen the role of the Public Prosecutor for Economic Crime
- Undertaking initiatives to inform and raise awareness among judges, diplomats and tax administration officials

## 2024 Rule of Law Report

### References to Greece's progress with regard to the following:

- NACAP 2022-2025 implementation degree
- Strengthening the legal framework for combating corruption and bribery of foreign public officials
- Implementing the new institutional framework for asset declarations

## 2.9.2. International Partnerships

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

- 8<sup>th</sup> ICAC Symposium on Combating Corruption (Hong Kong, 22 - 24.05.2024)
  - The NTA Interim Governor presented a keynote speech to the plenary session entitled: "Contemporary Challenges in Fighting Corruption," highlighting the pivotal role of new technologies (AI, data analytics) in tackling corruption
  - The NTA attended the 7<sup>th</sup> IAACA Executive Committee (ExCo) Meeting
  - On the margins of the symposium, the NTA delegates held bilateral meetings with representatives of counterparts from Italy (ANAC), Brazil (CGU), the Philippines (PCGG), Australia (NACC) and Singapore (CPIB), as well as with the representative of the United Nations Office on Drugs and Crime (UNODC).
  - A two-day working visit to mainland China was held to exchange know-how and good practices with counterpart authorities.
- Global Anticorruption and Integrity Forum (GACIF) (Paris, 26-27.03.24)
  - A working meeting entitled "Sharing Practices: internal control and internal audit frameworks" with the participation of heads of national audit authorities responsible for coordinating and developing internal audit standards and methodologies
  - Presentation of the OECD "Anti-corruption and Integrity Outlook 2024" report, which assesses the effectiveness of national public integrity frameworks through the development of a comprehensive system of public integrity indicators.
  - Participation in the working group for the development of a methodology for measuring integrity safeguards in the criminal justice system and disciplinary law for civil

servants

- Bilateral meeting with the Permanent Representation of Greece to the OECD to strengthen coordination mechanisms and ensure optimal representation of the country

- Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network) (January 2024)
  - Annual meeting of the European Lobbying Registrars' Network (ELRN) (Vilnius, 25.04.2024)
  - Meeting of the Council of Europe's Network of Corruption Prevention Authorities (NCPA) (09.07.2024)
  - Training programme of the Multinational Peace Support Operations Training Center (Kilkis, 23-27.09.2024)
  - Meeting of the EU Network Against Corruption (Brussels, 3.10.2024)
  - Meeting of the European Network for Public Ethics (ENPE) (Rome, 10-11.10.2024)
  - International Conference on "Prevention - Detection - Investigation - Protection of EU Budget in the digital age" co-organised by the NTA and OLAF (Athens, 05-07.11.2024)
- ## Bilateral Cooperation
- Summer Academy on modern techniques for the prevention and investigation of fraud and corruption organised by NTA - ICAC - HKIAAC (Athens 27.06.24 - 09.07.24)
  - Training programme on specialised topics related to the audit process attended by Nepal's National Anti-Corruption Authority officers (Athens, 15-17.04.2024)
  - Online meeting between NTA inspectors-auditors and the French Authority AFA to exchange best practices in the field of handling whistleblowers reports (22.10.2024)
  - Presentation of recent national interventions in the field of public integrity at the Anti-Corruption Seminar for Belt and Road Initiative Partners organised by the Chinese Ministry of Commerce (Beijing, 11-27.11.2024)
  - Visit by the President of UAE Accountability Authority to the NTA headquarters (Athens, 05.12.2024)



# 3. OPERATIONAL PLANNING FOR 2025

The operational planning for 2025 involves interventions in the following areas:

- **National Integrity System**
- **Internal Control System**
- **Corruption Risk Management**
- **Raising Awareness and Information**
- **National Anti-Corruption Action Plan**
- **Employee Skill Development**
- **Digital Transformation**
- **Personal Data Protection**
- **Implementation of RRF Projects**
- **Operational Goal-Setting**







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