



Greece-OECD Project:
Technical Support on Anti-Corruption

Baseline Report on Greece's National Anti-Corruption Action Plan: Revision and M&E Processes



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About the Greece-OECD Project

The Greek government is prioritising the fight against corruption and bribery and, with the assistance of the European institutions, is committed to taking immediate action. Under the responsibility of the General Secretariat Against Corruption, Greece's National Anti-Corruption Action Plan (NACAP) identifies key areas of reform and provides for a detailed action plan towards strengthening integrity and fighting corruption and bribery. The OECD, together with Greece and the European Commission, has developed support activities for implementing the NACAP. This project is scheduled for completion in 2018 and is co-funded by the European Commission and Greece. For further information, please see [the project webpage](#).



ΓΕΝΙΚΗ ΓΡΑΜΜΑΤΕΙΑ ΓΙΑ ΤΗΝ
ΚΑΤΑΠΟΛΕΜΗΣΗ ΤΗΣ ΔΙΑΦΘΟΡΑΣ

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I. Introduction

1.1 Purpose

The purpose of this Baseline Report is to provide an overview of the process for revising Greece's National Anti-Corruption Plan (NACAP), and the associated monitoring and evaluation (M&E) mechanisms utilised between 2015 and 2017. This report should be read in conjunction with the Manual on Standard Procedures for the National Anti-Corruption Action Plan, which provides step by step guidance on how to improve the process in the future.

1.2 Background

The General Secretariat Against Corruption (GSAC), Ministry of Justice, Transparency and Human Rights; the Structural Reform Support Service (SRSS), European Commission; and, the Organisation for Economic Co-operation and Development (OECD) are key stakeholders in the Greece-OECD Technical Support Project on Anti-Corruption. The project spans 18 months and addresses 10 components.

This Baseline Report pertains to the third component that focuses on strengthening the capacity of the General Secretariat Against Corruption (GSAC). It was prepared on the basis of two workshops held in May and June 2017 as well as a consultation meeting with GSAC and semi-structured interviews with EC and Institutions representatives between November 2016 and July 2017.

In March 2013, Greece adopted its national strategy against corruption called "Transparency – A National Anti-Corruption Action Plan", prepared by the Ministry of Justice. This initial strategy broadly included the actions identified in the Anti-Corruption Road Map for Technical Assistance in the Field of Anti-Corruption, agreed in October 2012 between the European Commission Task Force and the Greek authorities. In the preamble, the role of the Task Force for Greece (now the Structural Reform Support Service, SRSS) is mentioned, showing its membership for the first action plan.

The National Anti-Corruption Plan is linked to Greece's obligations derived from the relevant MoU. As per Law 4336 (Government Gazette 94/08.14.2015) "Pension provisions; Ratification of the Draft Financial Assistance Convention by the European Stability Mechanism and arrangements for the implementation of the Funding Agreement", and specifically under C.5.3 *Fighting corruption*, it is provided that:

As a prerequisite the authorities will update and publish a revised strategic plan for the fight against corruption and implement it according to schedule, and that complete activation of this strategy requires the immediate securing of relevant resources [...].

Further to this, GSAC's Action Plan Unit (established as per Law 4320/2015) became an Office inside GSAC, dedicated to the implementation of the Transparency national strategy and the development of coordinated action programs for the fight against corruption and within the framework of the national strategy (as provided by Law 4446/2016, art. 54, par. 3). A new draft law is expected in 2018, which will indicate in detail the competences and duties of each GSAC official.

According to Law 4320/2015, GSAC falls under the authority of a new Minister of State. Under Article 12 of the law, this entity drafted a national anti-corruption strategy and ensures its coherence and effectiveness, with an emphasis on coordination between control, audit and anti-corruption bodies and within various ministries and agencies, including the Financial Police Division (FPD), the Financial and Economic Crime Unit (SDOE), the Ministries' Internal Control Units, and the Inspectorate Body for Health and Welfare Services Inspection Body (SEYYP). Based on Law 4320/2015, two major control and anti-corruption bodies, the Inspectors-Controllers Body for Public Administration (SEEDD) and the Inspectors Body for Public Works (SEDE), were moved to be under the jurisdiction of GSAC.

Box 1. GSAC's competences

GSAC is responsible for taking the necessary steps and actions to ensure the coherence and effectiveness of the national strategy, with particular emphasis on coordination of audit bodies and the efficiency of their operations and provide relevant instructions and recommendations.

More specifically, according to Law 4320/2015 (as amended by v.4446/2016) the General Secretariat against Corruption:

- Shall take the necessary initiatives and steps to ensure coherence and effectiveness of the national strategy, with a special focus on the coordination of inspection bodies and the effectiveness of their actions and provide instructions and recommendations.
- Is appointed as the competent authority for the coordination of the fight against fraud (AFCOS) in accordance with paragraph 4 of Article 3 of Regulation (EU, EURATOM) No 883/2013 of the European Parliament and of the Council of 11 September 2013 (OJ L248).
- Cooperates with international organisations and the institutions and bodies of the European Union or other countries for the preparation and implementation, –of strategic plans, exchange of best practices and technical assistance for combating corruption and fraud.
- Removes conflicts and resolves matters of overlapping responsibilities between departments or agencies involved in the fight against corruption, by proposing appropriate solutions for the effective resolution of those matters.

- Receives complaints on cases of corruption in the public and the private sector, and cases of irregularities, and suspected fraud in EU structural funds.
- Proposes, develops and plans programmes and actions to be funded through EU funds and other, transnational programmes GSAC or the bodies supervised by it. (Article 53 of law 4446/2016).
- Exercises operational control of the Financial Police, the Financial Crime Unit (SDOE), Internal Audit Services of the Ministries, and the Inspectorate of Health and Welfare Services (SEYYP).

II. Procedures for Revising the National Anti-Corruption Action Plan

As mainly a strategy document, “Transparency” was operationalised in January 2014 in the form of a National Anti-corruption Plan with specific objectives and actions in an Excel spreadsheet. While the original strategy document has not been revised, the National Anti-Corruption Action Plan in Excel is in principle revised annually, and has in fact been revised in 2015 and 2017. Revisions are negotiated between the Greek authorities, SRSS and the Institutions, through an exchange of emails and verbal discussions. This could be described as informal and ad hoc process.

1.2 Revision process 2015

Following a new MOU in 2015, the first revision process that year was based on an initial identification of actions that GSAC found, vague and ambiguous and thus difficult to implement as well as areas containing errors or gaps. For example, there were instances of authorities involved who need to be added, and errors in deadlines that needed to be corrected. The revisions were negotiated back and forth over a two month period.

Although it was considered that stakeholder inputs in the revision process would be beneficial, this step was not taken due to time considerations. Due to the fact that the action plan was not consulted, GSAC confirms the agreement of all stakeholders including the Prime Minister, Cabinet, Parliament, political parties and others, on an annual basis, through the presentation of an annual report. This report provides GSAC’s review of progress on the plan’s implementation.. In particular, there is a specific objective in the current Action Plan, which defines that the relevant report is submitted to the Prime Minister and to the competent Ministers regarding the implementation review of “Transparency.”

1.3 Revision process 2017

The 2017 revision process was based on an “internal non-paper” prepared by GSAC’s Action Plan Office. In January 2017, the Action Plan Office submitted to the GSAC Secretary General, amendments and improvements to the Action Plan, which were then agreed as a Service. After informing the Alternate Minister of Justice, the proposed revisions were submitted to SRSS and the Institutions. The process was not broadly consulted with stakeholders, as the changes were minimal.

The first draft of the 2017 revision included: (1) the extension of the ending dates of the actions in order to be aligned with the timetable of the provided technical assistance by the OECD including the provision of time needed for their implementation, (2) the replacement of the "Minister of State" by the "Alternate Minister of Justice, Transparency and Human Rights ", (3) the correction of the ending dates of Objective no. 3, (4) The integration of the MoU commitment that requires the assessment of the implementation of the Code of Conduct of members of Parliament and (5) the proposal of certain actions that were already concluded, as "continuous".

GSAC, in close cooperation with the Structural Reform Support Service (SRSS) in Greece, is developing a second draft of the 2017 revision in late 2017 and early 2018, to update the Action Plan, taking into consideration the new needs in the field of anticorruption.

III. Monitoring & Evaluation

This section discusses the monitoring and evaluation of the implementation of the National Anti-Corruption Action Plan. Its purpose is to support decision makers in the identification of areas requiring improvement. A suggested approach with guidelines for monitoring and evaluation is provided in the Manual on Standard Procedures for the National Anti-Corruption Action Plan, produced in September 2017 as part of the Greece-OECD technical assistance project.

3.1 Monitoring

The 2013 Transparency Anti-Corruption Action Plan refers briefly to "Monitoring and Control" as well as "Evaluation and Self Evaluation", however the action plan and its 2015 revision do not include specific guidelines for doing so. In the absence of such guidance, GSAC considers the Monitoring and Evaluation section of the UN Guide for Anti-Corruption Policies (UNODC 2003) as a guide for the monitoring and evaluation of the Greek national plan. The UN Guide has a 1.5 page summary of different types of monitoring and evaluation (M&E) systems, including a mention of ad hoc monitoring which is similar to GSAC's. No specific procedure or mechanisms are given.

Since GSAC was established, it has organised and participated in a number of meetings, in order to coordinate and promote the implementation of the action plan. On an ongoing basis, it collects information from the services it coordinates and other relevant authorities, sends comments, and verifies information. In most cases these activities are followed by a number of letters or email exchanges that establish evidence of the implementation of the plan's actions.

There is not an established focal point at each of the services GSAC coordinates or collaborates with, for communicating with GSAC or reporting on the Action Plan progress. The responsible GSAC staff person depends on the action area. GSAC has four liaison officers that are considered as relevant focal points in the following action areas:

1. Office for action, coordination and operational planning of the Financial and Economic Crime Unit (SDOE)
2. Office for action, coordination and operational planning of the Economic Police Directorate.
3. Office for action, coordination and operational planning of the internal audit units of the Ministries.

4. Office for action, coordination and operational planning of the Body of Inspectors of Health Services and Welfare (SEYYP).

On a quarterly basis, GSAC provides the Institutions with the Greek authorities' assessment of the implementation of each action in the National Anti-Corruption Plan. It does this by updating the "Authorities' assessment" and "Authorities' comments" columns for each action on the spreadsheet. This update is sent to the representative of the Institutions who is responsible for monitoring the plan. This is followed by a back and forth communication between the Institutions and GSAC, with consultation of the relevant Greek authorities for clarifications and further information or evidence. There is no specific time frame for authorities to reply to GSAC's information requests or queries.

As an example, the assessment of Q4 of 2016 was concluded at the end of March 2017, with close to half of the 112 actions considered to be done. The classification system for the assessment of the status of each action is shown in Table 1 below.

Table 1. **Assessment of Actions**

Status	Description
N/A	Not yet overdue and no work started
Started	Not yet overdue and work started
Under assessment	Action is overdue, Institutions need to reply to authorities' proposal
Pending	Action is overdue and authorities need to make proposal to institutions or reply to comments
Done	Agreement that action has been done and observed
Done and replaced	Replaced by another action due to change in policy

3.2 Evaluation

It was envisioned in "Transparency" that the implementation of the action plan would be evaluated at the end of each calendar year. Furthermore, it was proposed that an independent evaluation be carried out "to determine the progress in all strategic objectives and identify all areas that require special attention" (112). However, it was not agreed as a commitment to carry out an independent evaluation. Rather, the evaluation process is based on law no. 4336/2015 (Gov. Gaz. 94/08.14.2015).

The box below summarises different types of evaluation according to the stages of action plan implementation, and their uses.

Box 2. Evaluation in Relation to Policy Implementation Stages

While monitoring is carried out regularly, evaluations are carried out periodically at particular stages of policy implementation. Depending on the implementation stage there may be different evaluations carried out, including a baseline survey, mid-term evaluation, summative evaluation, or ex-post evaluation.

1. Baseline survey: A baseline survey is a formative evaluation that is carried out before implementation of an action plan begins, to establish the starting point and inform future evaluations. The same tools and methodologies used for a baseline survey may be repeated in mid-term or final evaluations, and may include the collection and analysis of both qualitative and quantitative data according to set indicators.

2. Mid-term evaluation: A mid-term evaluation or review is carried out midway through an initiative, in order to measure to what extent the goals and objectives are being met. This is used to inform management and control decisions, to either build confidence in the direction taken, or consider a change of implementation strategies.

3. End-term evaluation: The end-term evaluation is carried out when the action plan is completed, to establish outputs and immediate outcomes of the actions. The results of the evaluation are compared to the results at baseline, using the pre-established indicators. This is used to inform stakeholders on the project success and to document success stories and lessons learnt.

4. Ex-post evaluation: This evaluation is also carried out after the action plan is completed, but it is more rigorous and done by external evaluators for the purposes of independent assessment. This type of evaluation often takes place a longer time after the end of the actions, because it aims to capture impacts that can often only be measured after some time has passed.

The progress of the Action Plan's implementation was discussed among Greek authorities, SRSS and the Institutions on a quarterly basis, and this informed the drafting of a revised Action Plan in 2015. The strategy part of the Transparency document was not revised however the Action Plan was revised and restructured upon the existed strategy.

A formal evaluation of the Action Plan's implementation has not been carried out, and would require specific and measurable indicators, as discussed below.

3.3 Indicators

The current National Anti-Corruption Action Plan does not have indicators to provide measures to inform whether an objective - or a specific action under each objective - is fulfilled or not. Ideal indicators are specific, measurable, and realistic. An ideal indicator measures only one variable unambiguously at a reasonable effort. Such indicators are not found in the original Transparency or the subsequent revision and should be considered in the next revision. On the one hand, it could be difficult to reach agreement on these indicators, but on the other hand, their inclusion would virtually eliminate the need for Greek

authorities to negotiate the progress reported in quarterly updates to the Institutions.

As shown in Box 3 below, the “Efficiency Evaluation Indicators” in “Transparency” are not specific and measurable.

Box 3. “Efficiency Evaluation Indicators” for TRANSPARENCY Objectives

Strategic Objective 1: Efficient political leadership in the fight against corruption

- Consistent political pledges and actions
- Adoption of Codes of Conduct by the Parliament and the Government
- Adoption of Codes of Conduct by all Local Authorities
- Voting of anti-corruption statutes
- Action taken by the Parliament based on the reports of the National Coordinator
- Voting of law for the funding of politicians and parties

Strategic Objective 2: Increased public demand for accountability and rejection of corruption

- Alertness of society for political anti-corruption actions
- Implementation of PPSSAC plans in all sectors of increased corruption
- Joint actions with all anti-corruption non-governmental bodies
- Comprehensive annual reports

Strategic Objective 3: Efficient enforcement of anti-corruption measures

- Voting of legislation
- Operation of internal structures for controlling transparency in General Government bodies
- Full compliance of Greece with international obligations within the period of “TRANSPARENCY”
- Development of joint legal initiatives for mutual support with at least six other countries
- Time required for reducing corruption cases by 50%

Strategic Objective 4: Increased compliance with sound management regulations and increased accountability of public and private bodies

- Reporting of anti-corruption cases in bodies, services and Local Authorities
- Individual / sectoral anti-corruption actions

- Identification of high risk areas for corruption
- Annual reports on integrity / accountability issues
- Assessment of integrity of public bodies (National Integrity Survey)
- Implementation of the public sector reform

Strategic Objective 5: Reinforced implementation of the “TRANSPARENCY” anti-corruption plan

- Systems for collecting information, installed and in operation
- Strategic decisions relating to the coordination of the fight against corruption
- Anti-corruption research programme, in operation
- Detailed reports and work plans submitted for annual joint review
- Activated mechanisms for the control and assessment of “TRANSPARENCY”
- Joint policy on education and plan for the joint use of resources, in operation
- Information and communications systems in operation
- Resources allocation planning

Further, the indicators above do not correspond directly to the actions contained in “Transparency”, or in the subsequent Action Plans. As seen in Table 2 below, there is for example, an objective to strengthen capacity and skills of state internal audit units.¹ The actions listed to achieve this objective are a description of the actions that more capable and skilled units or department might take, but they are not actions that will directly lead to greater capacity and skills. As a result, and in the absence of specific, measurable and realistic indicators to report against, the achievement of the objective is open to wide interpretation, as seen in the Authorities Comments column.

1. The Excel document in English refers to “control units”; however, it is audit units.

Table 2. Excerpt from NACAP with 2016 Q4 Assessment

Objectives	Actions	Responsible authority	Start	End	Authorities assessment of action	Authorities comments
Strengthening of capacity and skills of state internal control units or departments in Anti-Corruption.	<p>Internal control units will regularly report cases of suspected corruption and submit proposals for developing Anti-Corruption activities to the General Secretariat against corruption and to the Minister of State.</p> <p>Regular consultation among the Minister of State, the General Secretariat against corruption and internal control units is achieved through the competent Liaison Officer. Minister of State, General Secretariat against corruption</p>	Minister of State, General Secretariat against corruption	1.10.2015	Continuous	Done for 2016	<p>GSAC has a) carried out meetings with senior executives of Internal Audit and Internal Affairs Units, b) been informed in writing by them, c) included a relevant chapter in the annual report of the Deputy Minister of Justice in June 2016. Based on the above, GSAC will proceed to the necessary steps for the strengthening of the abovementioned services. This action is being implemented through the Liaison Officers which operate under the auspices of the General Secretariat against corruption.</p> <p>A working Group has been established to the GSAC working on the mapping of the Greek internal audit system and its development. Its work will be concluded at the end of 2016. More specifically, GSAC received 18 reports of suspected corruption and 16 with proposals for 2016. The above reports have been taken into consideration and their conclusions have been incorporated in our annual report.</p> <p>Moreover GSAC developed guidelines for the effective function of Internal Audit Units of all the Ministries.</p> <p>In parallel, for the implementation of the National Strategic Plan to combat and prevent Corruption, a contract for the provision of technical assistance was signed with the OECD, in August 2016. The project, which is in progress, proposes a set of 10 outcomes. One of them matches this objective of the National Strategic Plan, regarding the modernisation of internal and external audit mechanisms in Public Administration.</p>

3.4 Information Management Systems

It was envisioned in the “Transparency” plan that an agreement between the relevant bodies such as the Hellenic Statistical Authority would establish a specialised programme for the management and use of collected information and data.

For monitoring NACAP progress, GSAC collects information through letters, emails and meetings, and consolidates that information and manages it on an Excel spreadsheet that contains the National Anti-Corruption Plan actions and corresponding progress and status of each action (see excerpt above, in Table 2).

GSAC also collects quantitative and qualitative data regarding corruption (cases, controls, actions etc.) from a number of bodies. These data are sent to the Bank of Greece which collects the necessary statistical information that allow it to fulfill its duties and abide by its obligations in respect to the provision of data to the European Central Bank under article 5 of the Statute of the European System of Central Banks.

GSAC’s annual report covers the corruption data collection by GSAC, which is also uploaded to its website. The bodies with which GSAC has collaborated and collected data are given in the following table:

Table 3. **Bodies from which GSAC collects data regarding corruption**

SUPREME COURT’S PUBLIC PROSECUTION OFFICE
GENERAL COMMISSION OF THE STATE
THE PROSECUTOR’S OFFICE AGAINST CORRUPTION (ATHENS)
THE PROSECUTOR’S OFFICE AGAINST CORRUPTION (THESSALONIKI)
COURT OF FIRST INSTANCE OF ATHENS
COURT OF FIRST INSTANCE OF THESSALONIKI
COURT OF FIRST INSTANCE OF PIRAEUS
HELLENIC FINANCIAL INTELLIGENCE UNIT (FIU)
THE GREEK OMBUDSMAN
INDEPENDENT AUTHORITY FOR PUBLIC REVENUE INTERNAL AFFAIRS DIRECTORATE
CUSTOMS SERVICE
GENERAL INSPECTOR OF PUBLIC ADMINISTRATION
HELLENIC POLICE INTERNAL AFFAIRS DIRECTORATE
HELLENIC POLICE, FINANCIAL POLICE DIVISION
CYBER CRIME DIVISION OF THE HELLENIC POLICE
THE INSPECTORS-CONTROLLERS BODY FOR PUBLIC ADMINISTRATION –I.C.B.P.A. SEEDD
SPECIAL SECRETARIAT OF THE FINANCIAL AND ECONOMIC CRIME UNIT (SDOE)
MINISTRY OF FINANCE/INTERNAL AUDIT UNIT
HEALTH AND WELFARE SERVICES INSPECTION BODY
SERVICE FOR THE CONTROL OF HEALTH EXPENDITURE OF SOCIAL SECURITY FUNDS, NATIONAL ORGANIZATION OF HEALTH CARE SERVICES (YPEDYFKA EOPYY)
INSPECTORS – CONTROLLERS BODY FOR PUBLIC WORKS (SEDE)
INTERNAL AFFAIRS SERVICE OF THE HELLENIC MINISTRY OF SHIPPING AND ISLAND POLICY

IV. Conclusions

During the 2015 to 2017 period under consideration in this report, the process of revising the National Anti-Corruption Plan was carried out in close cooperation with the Structural Reform Support Service (SRSS) in Greece. The Action Plan was not based on specific, measurable and realistic indicators which would allow for effective monitoring and evaluation of its implementation.

In order for GSAC to be able to systematically review and update Greece's National Anti-Corruption Action Plan annually, and to create, review and update indicators for quarterly monitoring, it is suggested that the plan's actions be grouped, coordinated and drafted in ways that use those actions as a framework for ministry and agencies reporting and thus for measurement, reporting, review and updating of the Action Plan. The Action Plan's activities and initiatives should also be directly linked to its objectives in every instance. A suggested approach for how to do this with step by step guidelines is provided in the Manual on Standard Procedures for the National Anti-Corruption Action Plan, as part of the Greece-OECD technical assistance project.

Glossary

Evaluation	The systematic and objective assessment of an on-going or completed initiative, its design, implementation and results. The aim is to determine the relevance and fulfilment of objectives, efficiency, effectiveness, impact and sustainability.
Monitoring	A continuing function that uses systematic collection of data on specified indicators to provide management and the main stakeholders of an ongoing initiative with indications of the extent of progress and achievement of objectives and progress in the use of allocated funds.
Review	An assessment of the performance of an intervention, periodically or on an ad hoc basis. Reviews are usually less comprehensive and/or in-depth than evaluations. They tend to emphasize operational aspects.

References

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