

NATIONAL ANTI-CORRUPTION ACTION PLAN

PART 1: SECTORIAL PREVENTION OF CORRUPTION

| Nr. | General Strategy Objectives | Nr. | Specific Action-Plan Objectives | Nr | Action/Measure | Starting Date | Ending Date | Progress | Connection to Technical Assistance/financial tools/action plans | Action nr |
|-----|---|-----|--|-------|---|---------------|--------------------------------------|----------------------------|---|-----------|
| 1 | Public finances | 1.1 | Introduce international accounting standards for the public sector (budgetary processes) | 1.1.1 | Presidential decree for the introduction of an accounting framework which will apply to the entities of the General Government and will be based on International accounting standards. | 1/6/2018 | 31/12/2018 | completed | | 1 |
| | | 1.2 | Exploring and advising will be done on the best way to enhance the currently operational registry of bank accounts. | 1.2.1 | The registry of bank accounts will be extended to incorporate loans. | 1/6/2018 | 30/9/2018 | completed | | 2 |
| | | 1.3 | Strengthening of mechanisms for asset recovery and asset management. | 1.3.1 | The existing legal framework on asset recovery, will be improved by taking into account international standards (OECD, CoE, UN, UNTOC, international best practices), by preparation and adoption of strengthening the asset recovery (freezing, seizure and confiscation etc). | 1/6/2018 | 31/12/2019 | completed | | 3 |
| | | | | 1.3.2 | Enhancement of the legislative framework for the management of frozen, seized and confiscated assets. | 1/6/2019 | 31/12/2020 | on-going (already started) | EEA Grants | 4 |
| | | | | 1.3.3 | Institutional Reform of the Asset Recovery Office (ARO). | 1/6/2018 | 31/12/2019 | on-going (already started) | EEA Grants | 5 |
| | | | | 1.3.4 | Establishment of the Asset Management Office (AMO). | 1/6/2019 | 31/12/2020 | completed | | 6 |
| | | | | 1.3.5 | Design and development for an asset recovery and management e-platform. | 1/6/2019 | 31/12/2020 | on-going (already started) | EEA Grants | 7 |
| | | 1.4 | Establishment of a central registry of beneficial ownership information of legal persons | 1.4.1 | Legislative initiative establishing a central registry of beneficial ownership information of legal persons to ensure public authorities access to adequate, accurate and current information. | 1/6/2018 | 31/3/2019 | completed | | 8 |
| 2 | Specific Sectorial Strategy: Public Procurement | 2.1 | Implementation of the Anti-Corruption Strategy | 2.1.1 | Monitoring the Implementation of the Strategy | 1/1/2019 | 31/12/2021 | completed | | 9 |
| 3 | Specific Sectorial Strategy: In Tax administration & customs | 3.1 | Adoption of Anti-Corruption Strategy | 3.1.1 | Publication of the Strategic Plan on the official website of Ministry of Finance and IAPR | 1/1/2019 | 31/1/2019 | completed | | 10 |
| | | 3.2 | Implementation of the strategy. | 3.2.1 | Monitoring the implementation of the strategy in cooperation with the Ministry of Finance and the relevant Authorities | 1/4/2019 | 31/12/2021 | completed | | 11 |
| | | | | 3.2.2 | The authorities will produce information and data allowing the monitoring of the anti-smuggling strategy. | 1/4/2019 | 31/12/2020 | completed | | 12 |
| 4 | Specific Sectorial Strategy: In Health | 4.1 | Adoption of Anti-Corruption Strategy | 4.1.1 | Publication of the Strategic Plan on the official website of the Ministry of Health | 1/1/2019 | 31/1/2019 | on-going (already started) | | 13 |
| | | 4.2 | Implementation of the strategy. | 4.2.1 | Monitoring the implementation of the strategy in cooperation with Ministry of Health and relevant bodies | 1/4/2019 | 31/12/2021 | on-going (already started) | | 14 |
| 5 | Specific Sectorial Strategy: In Defence | 5.1 | Adoption of Anti-Corruption Strategy | 5.1.1 | Publication of the Strategic Plan on the official website of the Ministry of National Defence | 1/1/2019 | 31/1/2019 | completed | | 15 |
| | | 5.2 | Implementation of the strategy. | 5.2.1 | Monitoring the implementation of the strategy in cooperation with Ministry Defence and Relevant Bodies | 1/4/2019 | 31/12/2021 | on-going (already started) | | 16 |
| 6 | Special anticorruption measures for sports / Strengthen transparency and integrity of sport society and public trust. | 6.1 | Developing a sound system with standardized processes and tools to effectively address corruption risks in the sport sector. | 6.1.1 | Mapping of the institutional gaps and procedures. | 1/1/2019 | 31/3/2019 | on-going (already started) | Article 11 (SRSP) | 17 |
| | | | | 6.1.2 | Assessment of the current legal and regulatory framework. | 1/1/2019 | 31/3/2019 | on-going (already started) | Article 11 (SRSP) | 18 |
| | | | | 6.1.3 | Development of the Anticorruption Strategy in the sport sector. | 1/4/2019 | 30/12/2019 | on-going (already started) | Article 11 (SRSP) | 19 |
| | | | | 6.1.4 | Implementation of the strategy. | 1/12/2019 | 31/12/2020 | on-going (already started) | Article 11 (SRSP) | 20 |
| | | 6.2 | Increased integrity awareness. | 6.2.1 | Awareness raising campaign against corruption in the sport sector. | 1/12/2019 | 31/12/2020 | on-going (already started) | Article 11 (SRSP) | 21 |
| | | | | 6.2.2 | Educational and training activities to promote integrity in the sport sector. | 1/12/2019 | 31/12/2020 | on-going (already started) | Article 11 (SRSP) | 22 |
| 7 | Special anticorruption measures for Environment | 7.1 | Developing a sound system with standardized processes and tools to effectively address corruption risks in the Environmental sector. | 7.1.1 | Mapping of the institutional gaps and procedures. | 1/1/2019 | 31/3/2019 | on-going (already started) | Article 11 (SRSP) | 23 |
| | | | | 7.1.2 | Assessment of the current legal and regulatory framework. | 1/1/2019 | 31/3/2019 | on-going (already started) | Article 11 (SRSP) | 24 |
| | | | | 7.1.3 | Development of the Anticorruption Strategy in the Environmental sector. | 1/4/2019 | 30/12/2019 | on-going (already started) | Article 11 (SRSP) | 25 |
| | | | | 7.1.4 | Implementation of the strategy. | 1/12/2019 | 31/12/2020 | on-going (already started) | Article 11 (SRSP) | 26 |
| | | 7.2 | Increased integrity awareness. | 7.2.1 | Awareness raising campaign against corruption in the Environmental sector. | 1/12/2019 | 31/12/2020 | on-going (already started) | Article 11 (SRSP) | 27 |
| | | | | 7.2.2 | Educational and training activities to promote integrity in the Environmental sector. | 1/12/2019 | 31/12/2020 | on-going (already started) | Article 11 (SRSP) | 28 |
| 8 | Increase Transparency in the private sector to ensure | 8.1 | Develop an Anti- Corruption Public Private Partnerships (ACPPP). | 8.1.1 | A detailed work plan will be developed. | 1/6/2018 | 30/9/2018 | completed | | 29 |
| | | | | 8.1.2 | Annual assessment on implementation of the work plan. | 1/12/2019 | 31/12/2020 Continuous Every December | on-going (already started) | | 30 |
| | | | | 8.1.3 | Awareness raising initiatives to engage the private sector (e.g. companies, accountants, auditors, etc) and media in anti-corruption actions. | 1/6/2018 | 31/6/2019 Continuous every June | completed | | 31 |

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| 8 | the private sector, to ensure a safe environment for building sustainable and inclusive growth | 8.2 | Strengthening of the institutional framework concerning the liability of legal persons on acts of corruption. | 8.2.1 | Regulatory initiatives for the framework of the liability of legal persons. | 30/9/2018 | 30/6/2020 | completed | | 32 |
| | | 8.3 | Rationalization and simplification of procedures for public and private investment programs | 8.3.1 | Establishment of a special inter-ministerial working group to review key processes and programs to identify common but more specific threats to their integrity | 1/1/2019 | 30/9/2019 | on-going (already started) | | 33 |
| | | | | 8.3.2 | Interconnection of the information bases of the State Aid Information System and the Monitoring Information System (M.I.S) to maximize the use of all data and improve communication between institutions | 1/1/2019 | 31/12/2019 | completed | | 34 |
| | | 8.4 | Mapping and analysis of the constraints related to corruption and illegal practices that undermine growth, competition, investments, productivity and trust | 8.4.1 | Survey for the impact of corruption for the state and the private economy . | 1/9/2018 | 31/12/2020 | on-going (already started) | SRSP 2 | 35 |
| 8.4.2 | Mapping and analysis of the constraints related to corruption and illegal practices that undermine growth, competition, investments, productivity and trust and proposals for reform. | | | 1/9/2018 | 31/6/2021 | on-going (already started) | SRSP 2 | 36 | | |
| 9 | Enhancing Transparency in Political Sector | 9.1 | Monitoring "declaration of assets" | 9.1.1 | Draft a Unified Audit Manual for all competent authorities on asset declaration | 1/3/2020 | 31/12/2020 | completed | | 37 |
| | | | | 9.1.2 | Training of the auditors in the audit methodology. | 31/1/2020 | 31/12/2020 | completed | | 38 |
| | | | | 9.1.3 | The audit Authorities will be given access to the databases of the Independent Authority of Public Revenue (IAPR), and of other bodies, for the effective conduct of audits. The access to information will be given to ongoing formal investigations under the proper procedure. | 30/9/2018 | 31/12/2019 | completed | | 39 |
| | | | | 9.1.4 | Follow up of the audits and collection of statistical data from audit bodies and judicial authorities. | 31/1/2019 | 31/12/2019 Continuous every December | completed | | 40 |
| | | 9.2 | Proposals for revision of the Constitution | 9.2.1 | Proposals for the abolition of the Parliament's ability to revoke the prosecution of the members of the government by its decision | 1/6/2018 | 31/12/2019 | completed | | 41 |
| | | | | 9.2.2 | Proposals for the abolition of the special statute of limitation for the prosecution of members and former members of the government | 1/6/2018 | 31/12/2019 | completed | | 42 |
| | | 9.3 | An effective framework for transparency, supervision and sanctioning of political party financing. | 9.3.1 | Legislation on the funding of political parties will be presented and adopted by the Parliament following international standards (Council of Europe). | 1/6/2018 | 31/7/2018 | completed | | 43 |
| | | 9.4 | Transparency and integrity in lobbying | 9.4.1 | Mapping in lobbying practices | 1/6/2019 | 30/12/2019 | on-going (already started) | EEA Grants | 44 |
| | | | | 9.4.2 | Formulation of policy proposals and recommendations. | 1/1/2020 | 31/12/2020 | on-going (already started) | EEA Grants | 45 |
| | | | | 9.4.3 | Development of the institutional framework concerning Lobbying. | 1/1/2021 | 31/12/2021 | on-going (already started) | EEA Grants | 46 |
| | | 9.5 | Conflict of interest | 9.5.1 | Mapping of existing legal framework. | 1/6/2019 | 30/12/2019 | on-going (already started) | EEA Grants | 47 |
| | | | | 9.5.2 | Enhancement of the institutional framework concerning Conflict of interest | 1/1/2020 | 31/12/2020 | on-going (already started) | EEA Grants | 48 |
| | | | | 9.5.3 | Examining the possibility for the creation of a monitoring mechanism. | 1/6/2020 | 31/12/2020 | on-going (already started) | EEA Grants | 49 |
| | | | | 9.5.4 | Actions for raising public awareness. | 1/6/2020 | 31/12/2021 | on-going (already started) | EEA Grants | 50 |
| | | 9.6 | Monitoring of the Code of conduct of the members of Parliament and the Code of conduct of the members of the Government | 9.6.1 | Assessment of the implementation of the Code of Conduct of the Members of the Parliament. | 1/6/2018 | 30/6/2018 | completed | | 51 |
| | | | | 9.6.2 | Revision of the Code of Conduct if needed based on the assessment. | 1/1/2018 | 30/6/2018 | completed | | 52 |
| | | | | 9.6.3 | Assessment of the Code of Conduct for members of the Government and revision if needed based on this assessment. | 1/11/2018 | 31/12/2018 | on-going (already started) | | 53 |
| | | 10 | Specific Sectorial Strategy:Local Government | 10.1 | Adoption of Anti-Corruption Strategy | 10.1.1 | Publication of the Strategic Plan on the official website of Ministry of Interior | 1/1/2019 | 30/1/2019 | on-going (already started) |
| 10.2 | Implementation of the strategy | | | 10.2.1 | Monitoring the implementation of the strategy in cooperation with Ministry of Interior and relevant authorities | 1/6/2019 | 31/12/2020 | pending (not yet started) | | 55 |
| | | | | 10.2.2 | The NTA in cooperation with the Ministry of Interior will assess the implementation of the strategy and submit proposals for necessary legal and other regulatory or administrative changes to enhance implementation. | 1/1/2020 | 31/12/2020 | pending (not yet started) | | 56 |
| 10.3 | Strengthening the audits of Local Government related to corruption and establishing Internal Audit Units in Regional and Municipal Authorities | | | 10.3.1 | Establishment of Internal Audit Units in Local Government | 1/6/2019 | 31/12/2019 | completed | | 57 |
| | | | | 10.3.2 | Capacity building of Internal Audit Units (e.g. development of manuals, training programs) | 1/1/2020 | 31/12/2020 | completed | AFETI | 58 |
| | | | | 10.3.3 | Local authorities will submit annual reports on audits related to corruption issues | 1/7/2018 | 31/12/2020 | pending (not yet started) | | 59 |
| PART 2: PUBLIC INTEGRITY ACROSS ADMINISTRATION AND JUDICIARY SYSTEM | | | | | | | | | | |
| | | 11.1 | Enhancement of Integrity in the Public Sector through the establishment of a National Public Integrity System (see also 9 "Increase Transparency in Political Sector") | 11.1.1 | Creation and Adoption of a National public integrity System. | 1/6/2019 | 30/6/2020 | on-going (already started) | EEA Grants | 60 |
| | | | | 11.1.2 | Assessment for the improvement of the National public integrity system. | 30/6/2021 | 30/9/2021 Continuous every September | pending (not yet started) | | 61 |
| | | | | 11.1.3 | Training of public officials in issues concerning the reinforcement of integrity policies and action plans. | 1/9/2020 | 31/12/2021 continuous every December | on-going (already started) | EEA Grants | 62 |
| | | | | 11.1.4 | Development of policies and specific tools for Conflict of Interest and Lobbying. | 1/6/2019 | 31/12/2019 | on-going (already started) | EEA Grants | 63 |
| | | | | 11.1.5 | Establish a monitoring and reporting mechanism to evaluate the progress of the implementation of the developed integrity policies and tools, across public institutions. | 1/6/2019 | 31/12/2020 | on-going (already started) | EEA Grants | 64 |

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| 11 | Advancing the integrity in the public sector and increasing the public trust. | 11.2 | Effective protection mechanisms of whistleblower protection will be established and implemented. | 11.1.6 | The Code of Conduct and Ethics for all public officials will be updated, including elected officials in Municipalities and prefectures. | 1/6/2019 | 31/12/2019 | on-going (already started) | EEA Grants | 65 | | |
| | | | | 11.1.7 | Establishment of a national annual award for exemplary services for the promotion of integrity in the public sector | 1/6/2019 | 30/6/2020 Continuous every June | on-going (already started) | EEA Grants | 66 | | |
| | | | | 11.2.1 | The General Secretariat against Corruption (ΓΕ.Γ.ΚΑ.Δ.-GSAC) will make recommendations or proposals for amendments of legislation of the whistleblower protection. | 1/6/2018 | 31/12/18 | completed | | 67 | | |
| | | 11.3 | Improvement of internal control system (internal safety valves) and enhancement of internal audit in central government and decentralised administration | 11.2.2 | Legislative initiative for the establishment of an effective mechanism for whistleblower protection | 1/1/2019 | 30/6/2019 | on-going (already started) | | 68 | | |
| | | | | 11.2.3 | Assesment of the legislative framework. | 1/7/2020 | 31/12/2020 | on-going (already started) | | 69 | | |
| | | | | 11.3.1 | Enhancing of internal control system (internal safety valves) | 1/9/2018 | 28/2/2020 | completed | AFETI | 70 | | |
| | | 12 | Enhancing the integrity and efficiency of the judiciary system | 12.1 | Enhancing efficiency of the judiciary system. | 11.3.2 | Strengthening the efficiency of the operation of Internal Audit Units (e.g. adopting manuals, developing training programs) | 1/9/2018 | 28/2/2020 | completed | AFETI | 71 |
| | | | | | | 11.3.3 | Internal Audit Units will report regularly (annually) on the audits carried out (number and type) and in particular those triggered by alleged or detected fraud and corruption incidents. | 1/12/2018 | 31/12/2018 Continuous every December | completed | | 72 |
| | | | | | | 12.1.1 | Provision for further guarantees against delays in judicial decisions | 31/12/2018 | 31/12/2019 | on-going (already started) | | 73 |
| 12.1.2 | Publication of statistics and annual periodic reports on workload management | | | | | 30/9/2019 | 31/12/2019 continuous every December | on-going (already started) | | 74 | | |
| 12.2 | Setting standards of professional conduct, integrity and accountability for judges and prosecutors. | | | 12.1.3 | Mapping and analysis of the administrative legal framework of administrative sanctions on corruption offences (bribery, foreign bribery and money laundering ar. 159, 159A, 235, 236, 237 PC and law 3691/2008), in order to examine the necessity to increase or redefine them. | 1/9/2018 | 1/2/2019 | completed | | 75 | | |
| | | | | 12.1.4 | Propose administrative incentives for accepting administrative sanctions in order to reduce pressure on judicial system, taking into account EU practices. | 1/4/2019 | 1/6/2019 | completed | | 76 | | |
| | | | | 12.2.1 | Mapping of the current procedures of the evaluation, selection, appointment, promotion and performance of the judges and prosecutors | 1/9/2018 | 28/2/2019 | on-going (already started) | SRSP 2 | 77 | | |
| | | | | 12.2.2 | Mapping of the current disciplinary procedures for judges and prosecutors and legislative initiatives for the improvement of the Judicial System according to International Standards | 1/9/2018 | 31/12/2018 | on-going (already started) | SRSP 2 | 78 | | |
| | | | | 12.2.3 | Proposals regarding the amendment of the Code of Courts' organization on the method of selecting, appointing and evaluating judges and prosecutors | 1/3/2019 | 30/6/2019 | on-going (already started) | SRSP 2 | 79 | | |
| | | 12.2.4 | Publication of statistics and annual periodic reports on disciplinary cases of judges and prosecutors | 30/9/2019 | 31/12/2019 continuous, every December | on-going (already started) | | 80 | | | | |
| | | 12.2.5 | Revision of the Code of conduct for judges / prosecutors. | 1/4/2020 | 31/12/2020 | on-going (already started) | SRSP 2 | 81 | | | | |
| 12.2.6 | Training for integrity issues, professional conduct and international best practices and standards for judges / prosecutors within the National School of Judges. | 1/1/2020 | 31/12/2020 | completed | | 82 | | | | | | |
| 12.2.7 | Assesment of the Code of conduct for judges and prosecutors. | 1/1/2021 | 31/12/2021 | pending (not yet started) | | 83 | | | | | | |
| PART 3:STRENGTHENING COOPERATION, COORDINATION AND COLLABORATION ACROSS THE PUBLIC SECTOR | | | | | | | | | | | | |
| | | 13.1 | Improving the model of cooperation between justice and tax administration in the fight against high level tax evasion | 13.1.1 | The financial crime investigation Directorate established by law 4512/2018 (Gov. Gaz. A' 5/17-01-2018), under the supervision and guidance of the Financial Prosecutor, with mission of dealing with the said high level tax fraud and the execution of prosecutors' orders in this field, will be provided with dedicated resources and sufficient number of auditors and other qualified personnel. | 1/6/2018 | 31/12/2018 | completed | | 84 | | |
| | | | | 13.1.2 | Assessment of the effectiveness of the functioning of the existing coordination procedure of art. 388, Law 4512/2018 for tax crimes, in order to widen the coordination, so as to include separately, besides tax crimes, corruption, money laundering and other financial crimes. | 1/1/2019 | 31/3/2019 | completed | | 85 | | |
| | | 13.2 | | 13.2.1 | Legislative initiative based on this assessment for the enhancement of the coordination between the financial and corruption prosecutors, the tax administration, the financial crime investigation Directorate and the other competent investigation services, combating tax, corruption and financial crimes. The legislative initiative will include a specific commitment for the relevant public reporting of actions | 1/4/2019 | 30/9/2019 | on-going (already started) | | 86 | | |
| | | | | 13.2.2 | i) An internal draft proposal for the creation of a monitoring procedure of a selection of important financial crimes, including notably corruption and money laundering cases with the objective to build a credible track-record of prosecuting and sanctioning such crimes, following usual data protection and penal procedure rules, will be produced. | 1/6/2018 | 30/6/2018 | completed | | 87 | | |
| | | | | | ii) Creation of a monitoring procedure of a selection of important financial crimes, including notably corruption and money laundering cases with the objective to build a credible track-record of prosecuting and sanctioning such crimes, following usual data protection and penal procedure rules | 1/7/2018 | 30/9/2018 | completed | | 88 | | |
| | | | | 13.2.3 | Necessary amendments of Law 4022/2011 will be made in order to strengthen and improve the work of the Public Prosecutor Against Corruption Crimes (PPACC). | 1/1/2019 | 30/6/2019 | completed | | 89 | | |
| | | | | 13.2.4 | Necessary amendments of the Penal Code and Code of Penal Procedure (CPP) will be made regarding: a) accession to art. 187 of corruption offenses b) the use of special investigative techniques (SITs) in corruption investigations | 1/1/2019 | 30/6/2019 | completed | | 90 | | |

Improvement of the inter-institutional cooperation

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| 13.2 | Strengthening the institutional framework of inspection, investigation and prosecution in national level, regarding combating corruption and financial crimes. | 13.2.5 | Establishment and full operationalization of the new Co-ordination Body for Anti-corruption (ESOEL) | 1/1/2020 | 1/9/2020 | completed | | 91 | | |
| | | 13.2.6 | NTA will draft an annual report for 2020 and submit it to the PM, line Ministries and the Parliament. The report will include among others reference on to the following: 1) major developments in the field of anti-corruption in Greece with special reference to initiatives taken to improve co-ordination 2) the progress of NACAP | 31/12/2020 | 31/3/2021 Continuous Every March | completed | | 92 | | |
| | | 13.2.7 | Regular analysis of the work of the Inspection and Audit bodies, according to the provision of art. 1 par. 2 (point γ) L. 3074/2002 as amended. | 1/3/2019 | 31/3/2019 Continuous Every March | completed | | 93 | | |
| | | 13.2.8 | General Inspector of Public Administration (GIPA) will strengthen operational coordination of the administrative audit and inspection mechanisms of corruption in order to reduce the total time demanded for inspection by preventing multiple and parallel inspections as much as possible, by standardizing inspections, by arranging combined inspections, if efficient. | 1/12/2018 | 31/12/2018 Continuous Every December | completed | | 94 | | |
| | | 13.2.9 | Draft NTA's Annual Audit Action Plan | 1/1/2020 | 31/12/2020 Continuous Every December | on-going (already started) | | 95 | | |
| | | 13.2.10 | Development of the strategic planning of inspections and audits of the public sector, by introducing strategic planning, risk analysis methods, sampling of the inspection and audits, and certain inspection techniques - except those planned by the relevant services of the Ministry of Finance and the Independent Authority of Public Revenue (IAPR). | 1/6/2018 | 31/12/2018 | completed | | 96 | | |
| | | 13.2.11 | Training for anticorruption issues for newcomers, key middle-management groups and individuals in General Government bodies will be arranged. | 1/12/2018 | 31/12/2018 Continuous Every December | completed | | 97 | | |
| | | 13.2.12 | Training on specific issues concerning anti-corruption and targeted inspections and audits in certain fields, including investigative techniques for corruption and economic crimes. The training will be addressed to the staff of General Inspector of Public Administration (GIPA), the Office of the Commissioner General of the State, inspection bodies, Special Secretariat for Financial and Economic Crime Unit (SDOE), Financial Police, Financial Prosecutors and Financial Intelligence Unit, as well as Judges and Prosecutor against Corruption. | 1/12/2018 | 31/12/2018 Continuous Every December | completed | Article 11 (SRSP) (Finnish Institute of Public Management-HAUS Training) | 98 | | |
| | | 13.2.13 | Greek embassies abroad should follow up printed and electronic press and send relevant information for corruption cases (eg.foreign bribery) to Public Prosecutor's against Corruption Crimes office | 1/12/2018 | 31/12/2018 Continuous Every December | on-going (already started) | | 99 | | |
| | | 13.3 | Institutional Activities and Implementation of the National Anti-Corruption Action Plan | 13.3.1 | Issue the Organizational Charter of NTA | 1/2/2020 | 1/9/2020 | completed | | 100 |
| | | | | 13.3.2 | Audit and Inspection Bodies, financial and corruption prosecutors, Financial Intelligence Unit (FIU) will submit a report annually including priorities, statistical Data and relevant proposals to the Alternate Minister of Justice and General Secretariat Against Corruption linked to corruption issues. | 1/4/2018 | 30/4/2018 Continuous every April | completed | | 101 |
| | | | | 13.3.3 | An Anti-corruption action plan will be published and implemented every 3 years | 1/6/2021 | 31/12/2021 Continuous every 3 years | on-going (already started) | | 102 |
| | | | | 13.3.4 | A yearly update of specific actions of the NACAP will be performed to align with binding decisions of courts, Independent Authorities and relevant provisions of other Action Plans, as well as to integrate recommendations addressed by international institutions and organizations. | 1/6/2018 | 31-12-18 Continuous every December | on-going (already started) | | 103 |
| 13.3.5 | Issue of a Circular for the handling of complaints. | | | 1/6/2018 | 31/12/2018 | completed | | 104 | | |
| 13.3.6 | Draft a comprehensive Complaints Management Manual | | | 1/3/2020 | 1/9/2020 | completed | | 105 | | |
| 13.3.7 | GSAC will publish all of the OECD technical assistance deliverables upon the conclusion of the project. | | | 1/7/2018 | 31/12/2018 | completed | | 106 | | |
| 13.4 | Institutional interventions to strengthen the co-ordination role of the AFCOS service | 13.4.1 | Establishment and operation of an Internal Network of National Agencies for the implementation and monitoring of anti-fraud policies. | 1/6/2018 | 31/12/2020 | on-going (already started) | SRSP 2 | 107 | | |
| | | 13.4.2 | Strengthening the role of Greek AFCOS in the Management and Control System of the Programming Period 2021-2027 | 1/6/2020 | 31/12/2020 | on-going (already started) | SRSP 2 | 108 | | |
| | | 13.4.3 | Issue of a Circular for the handling of complaints regarding co-funded programs. | 1/6/2018 | 31/12/2018 | completed | SRSP 2 | 109 | | |
| 13.5 | Developing fraud prevention policies | 13.5.1 | Mapping of national and EU-funded programs and the development of anti-fraud guidelines. | 1/9/2018 | 30/9/2019 | completed | SRSP 2 | 110 | | |
| | | 13.5.2 | Incorporating anti-fraud measures for the Rural Development Fund and the new funds. | 1/9/2018 | 30/9/2019 | on-going (already started) | SRSP 2 | 111 | | |
| | | 13.5.3 | Developing of a Integrity Plan concerning the new NSRF financial instruments. | 1/9/2018 | 30/9/2019 | on-going (already started) | SRSP 2 | 112 | | |
| | | 13.5.4 | Measures to fight fraud in structural funds will be undertaken and will be reported. | 1/6/2018 | 28-2-19 Continuous every year | on-going (already started) | SRSP 2 | 113 | | |
| 13.6 | Developing Anti-Fraud Communication Strategy and Training Plan regarding co-funded programs. | 13.6.1 | Developing an Anti-Fraud Communication Strategy | 1/9/2018 | 28/2/2019 | on-going (already started) | SRSP 2 | 114 | | |
| | | 13.6.2 | Drawing up a training plan about anti-fraud issues for involving stakeholders. | 1/9/2018 | 30/9/2019 | on-going (already started) | SRSP 2 | 115 | | |
| | | 13.7.1 | Report/Mapping of existing procedures for collecting and reporting statistical data in relation to the requirements set by international organizations (GRECO, UNCAC, OECD, FATF and OLAF) for the national competent authorities in Greece. | 1/9/2018 | 31/12/2018 | on-going (already started) | SRSP 2 | 116 | | |

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| 13.7 | Standardized collection and reporting of data on corruption and fraud cases from the competent Authorities. | 13.7.2 | A standardised and integrated system/methodology/plan of implementation for producing, compiling and reporting the full set of statistical data (based on the national and international requirements). | 1/9/2018 | 30/3/2019 | on-going (already started) | SRSP 2 | 117 |
| | | 13.7.3 | Concrete plan for collection and presentation of needed data for (regular domestic and international) reporting and statistics, based on the Anti-Corruption Action Plan (annual reporting etc.) and existing requirements for statistics for Corruption, Fraud and Economic crime, as defined by International Organisations (GRECO, UNCAC, OECD FATF and OLAF). | 1/9/2018 | 30/6/2019 | on-going (already started) | SRSP 2 | 118 |
| 13.8 | Adherence to international standards of anti-corruption (EU, OECD, CoE, UN) | 13.8.1 | NTA will monitor compliance and coordinate competent authorities to fulfil and implement the binding to the recommendations of International Organisations | 1/10/2019 | 31/12/2021 | on-going (already started) | | 119 |
| 13.9 | Establishment of the European Delegate Public Prosecutor's Office. | 13.9.1 | Legislative initiatives for the compliance of the national legislation to the Council's Regulation (EU) 2017/1939 and Directive (EU) 2017/1371 for the European Public Prosecutor's Office (EPPO) | 6/7/2019 | 31/10/2020 | on-going (already started) | | 120 |
| 13.10 | Improvement of the effectiveness of Mutual Legal Assistance (MLA) arrangements. | 13.10.1 | Exploring the possibility of restructure and streamline the MLA chapter of the Code of Penal Procedure in order to provide legal certainty and procedural clarity with regard to the transmission and execution of non-treaty MLA requests. | 31/12/2018 | 30/6/2020 | completed | | 121 |
| | | 13.10.2 | Modernize and update the MLA database of the Central Authority with functions that allow the generation of valuable statistics. | 31/12/2018 | 30/6/2020 | on-going (already started) | | 122 |
| | | 13.10.3 | Provision from the Court of Appeals Prosecutor on a yearly basis of compiled anonymised data on MLA requests, available for data mining and data analysis, directly sent and received among judicial and prosecutorial authorities. | 31/12/2018 | 30/6/2020 | on-going (already started) | | 123 |
| | | 13.10.4 | Issuing and publishing simple and comprehensive MLA guidelines to Practitioners on Seeking MLA in Corruption Cases. | 31/12/2018 | 30/6/2020 | on-going (already started) | | 124 |
| 13.11 | Active collaboration between the Anti Money Laundering Strategy Committee (supported by its working group the Anti Money Laundering Co-ordination Committee) and the General Secretariat against corruption for the implementation of the National Risk Assessment on Money Laundering and its Action Plan. | 13.11.1 | Drawing up typologies regarding the link between corruption and money laundering will be made, including making use of FATF reports on laundering the Proceeds of Corruption and Red Flag indicators. | 1/6/2018 | 30/12/2019 | on-going (already started) | | 125 |
| | | 13.11.2 | Improvement of the exchange of information between: the Financial Intelligence Unit, the Independent Authority for Public Revenue (IAPR) and the Financial Police Division (ΔOE). | 1/6/2018 | 30/12/2018 | completed | | 126 |
| | | 13.11.3 | Financial Intelligence Unit will receive reports from financial institutions, for suspicious transactions related to money laundering linked to corruption | 1/6/2018 | 31-12-18 Continuous every December | completed | | 127 |
| | | 13.11.4 | IAPR and the Financial Intelligence Unit (FIU) will publish monthly statistics on FIU cases transmitted to the IAPR and of their outcome. | 30/4/2018 | Continuous every 3 months | completed | | 128 |
| | | 13.11.5 | The Ministry of Justice will provide on a quarterly basis, data on: (i) indictments based on cases disseminated by the FIU to the IAPR, (ii) final convictions and amounts of confiscated proceeds based on these cases. | 1/6/2018 | Continuous every 4 months | completed | | 129 |
| 13.12 | Explore on the possibility of expanding access to databases to authorities involved in the anti-corruption network. | 13.12.1 | Access to all databases and information systems of IAPR will be given to the Anti-Corruption Prosecutor (Athens, and Thessaloniki), to the Investigative Judges of Law 4022/2011 and to the law enforcement bodies such as Financial Police Division of the Hellenic Police (FPD). The access to information will be given to ongoing formal investigations under the proper procedure. | 1/6/2018 | 31/12/2018 | completed | | 130 |
| | | 13.12.2 | Access to ERGANI database of the Ministry of Labour, Social Security and Welfare and access to "National Land Registry" of the Ministry of Environment and Energy will be given to Financial Police Division of the Hellenic Police (FPD) and Special Secretariat for Financial and Economic Crime Unit (SDOE). The access to information will be given to ongoing formal investigations under the proper procedure. | 1/6/2018 | 31/12/2018 | on-going (already started) | | 131 |
| | | 13.12.3 | Access to the Registry System of Bank and Payment Accounts will be given to the Anti-Corruption Prosecutors, to the Investigative Judges of Law 4022/2011, to the Internal Affairs Directorate of the Hellenic Police and the Internal Affairs Service of the Ministry of Shipping and Island Policy. The access to information will be given to ongoing formal investigations under the proper procedure. | 1/6/2018 | 31/12/2018 | completed | | 132 |
| | | 13.12.4 | Access to the real estate database of the Ministry of Finance will be given to the Investigative Judges of Law 4022/2011. The access to information will be given to ongoing formal investigations under the proper procedure. | 1/6/2018 | 31/12/2018 | completed | | 133 |

PART 4: EDUCATION AND RAISING AWARENESS

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|----|--------------------------|------|---|--------|--|-----------|---|----------------------------|-------------------|-----|
| 14 | Raising Public Awareness | 14.1 | Integrity forming programmes in greek educational system and academic institutions will be devised and promoted | 14.1.1 | Sign of a memorandum of cooperation between GSAC and Ministry of Education Research and Religious Affairs for common actions on the promotion of integrity in greek educational system | 1/6/2018 | 30/6/2018 | completed | | 134 |
| | | | | 14.1.2 | Development of educational material that promote integrity through the educational system. | 1/1/2019 | 30/6/2021 | on-going (already started) | Article 11 (SRSP) | 135 |
| | | | | 14.1.3 | Establishment of an annual open integrity festival addressed to the educational community. | 1/9/2018 | Continuous annually | on-going (already started) | Article 11 (SRSP) | 136 |
| | | 14.2 | Raising awareness actions to promote public participation and ownership | 14.2.1 | Annual AntiCorruption Forum. | 1/7/2018 | Continuous annually | completed for 2019 | | 137 |
| | | | | 14.2.2 | Annual public opinion polls or surveys on corruption and anti-corruption actions in Greece for public and private sector will be done to follow (and measure) the effectiveness of all anti-corruption work. | 1/12/2018 | 31/12/2018 Continuous every December | on-going (already started) | EEA Grants | 138 |
| | | | | 14.2.3 | Create a new website for NTA operating on G-Cloud | 1/3/2020 | 1/6/2020 | completed | | 139 |

PART 5: ORGANISATIONAL TRANSFORMATION AND OPERATIONAL REFORM OF THE NATIONAL TRANSPARENCY AUTHORITY

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|--|------|-------------------------------|--------|--|----------|------------|----------------------------|--|-----|
| Organisational Transformation and Operational Reform | 15.1 | Organisational Transformation | 15.1.1 | Merging of existing hand and electronic protocols to one existing application (Protocol Unification) | 1/3/2020 | 1/3/2021 | on-going (already started) | | 140 |
| | | | 15.1.2 | Merging all previous existing email addresses under a common domain (@aead.gr) | 1/3/2020 | 1/9/2020 | completed | | 141 |
| | | | 15.1.3 | Complete the staffing process for administrative staff | 1/9/2019 | 1/9/2020 | completed | | 142 |
| | | | 15.1.4 | Issue a Call for the recruitment of Auditors | 1/9/2020 | 31/12/2020 | on-going (already started) | | 143 |

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| 15 | Operational reforms of the National Transparency Authority | 15.2 | Operational Reforms | 15.2.1 | Draft a detailed action plan for the compliance of the NTA with Law 4624/2019, Regulation (EU) 2016/2079 and Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 on personal data protection | 1/3/2020 | 31/12/2020 | completed | | 144 |
| | | | | 15.2.2 | Draft a code of business conduct and a code of ethics for NTA's auditors and employees | 1/6/2020 | 31/12/2020 | completed | | 145 |
| | | | | 15.2.3 | Draft a manual for the management of Prosecution Orders | 1/3/2020 | 31/12/2020 | completed | | 146 |
| | | | | 15.2.4 | Develop an Integrated Complaints and Audit Management System | 1/1/2021 | 31/12/2023 | on-going (already started) | SRSP IV | 147 |