HELLENIC REPUBLIC

NACAP 2022-2025
IMPLEMENTATION REPORT
2nd SEMESTER 2023

NATIONAL TRANSPARENCY AUTHORITY

Table of Contents

Introduction

The present Report summarizes the progress of NACAP's implementation for the second semester of 2023.

The report is structured in two (2) sections:

Section 1 - Implementation Progress of NACAP 2022 - 2025, which includes aggregated data regarding the progress of NACAP's implementation, the status of the actions, and the deliverables produced based on predefined output indicators. Subsequently, the progress of the actions is further analyzed per Part of NACAP, with special reference to the progress of the National Integrity System (NIS) actions.

Section 2 - Conclusions - Recommendations, which includes the main conclusions from the monitoring process and summarizes the recommendations addressed to the implementing authorities for the improvement of NACAP's implementation and monitoring process.

Section 3 - Update of the NACAP 2022-2025, which refers to the actions taken by the NTA regarding the update of the National Plan.

Implementation progress - 2nd Semester 2023

Within the reference period twelve (12) actions were completed, bringing the total of completed actions to forty-seven (47), resulting in a completion rate of 33,3% at the end of 2023.

Of the twelve (12) actions completed during the second semester of 2023:

✓ Three (3) fall under the Strategic Objective "Enhancing the Audit/Investigations Framework for the Combat of Fraud and Corruption",
✓ Seven (7) fall under the Strategic Objective "Strengthening Integrity, Accountability and Transparency", and
✓ Two (2) fall under the Strategic Objective "Raising Awareness".

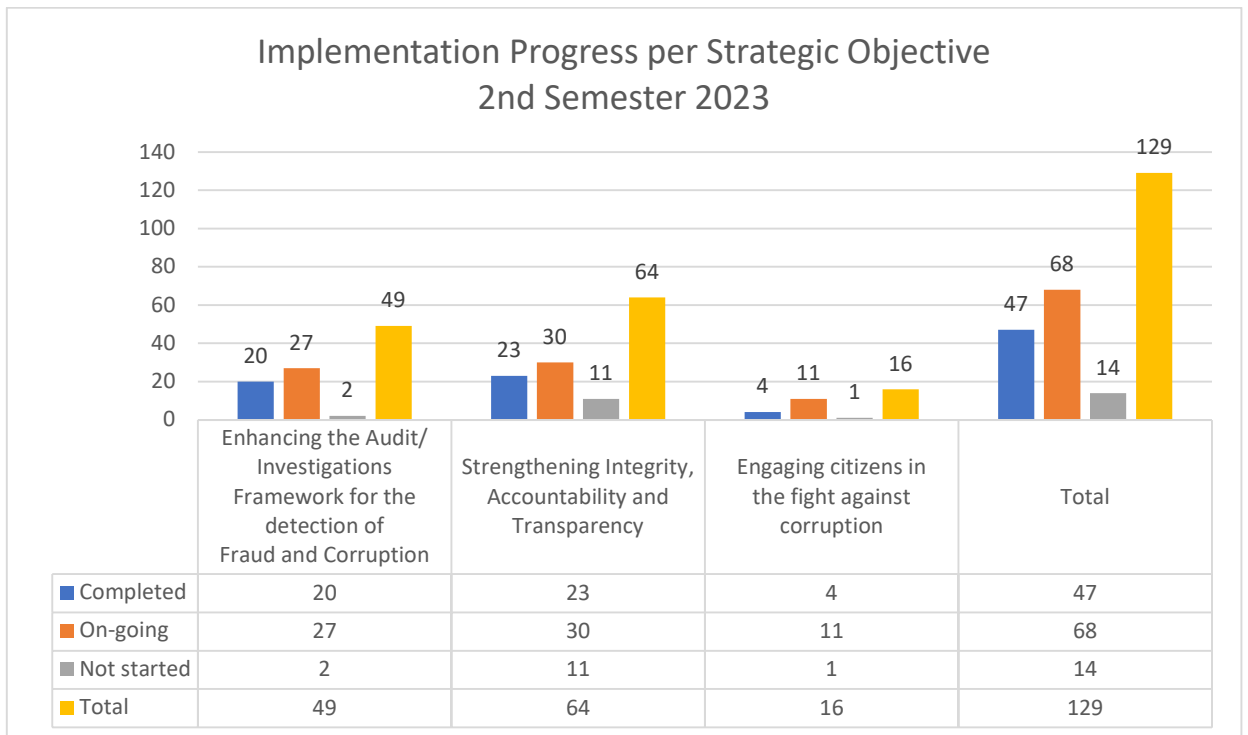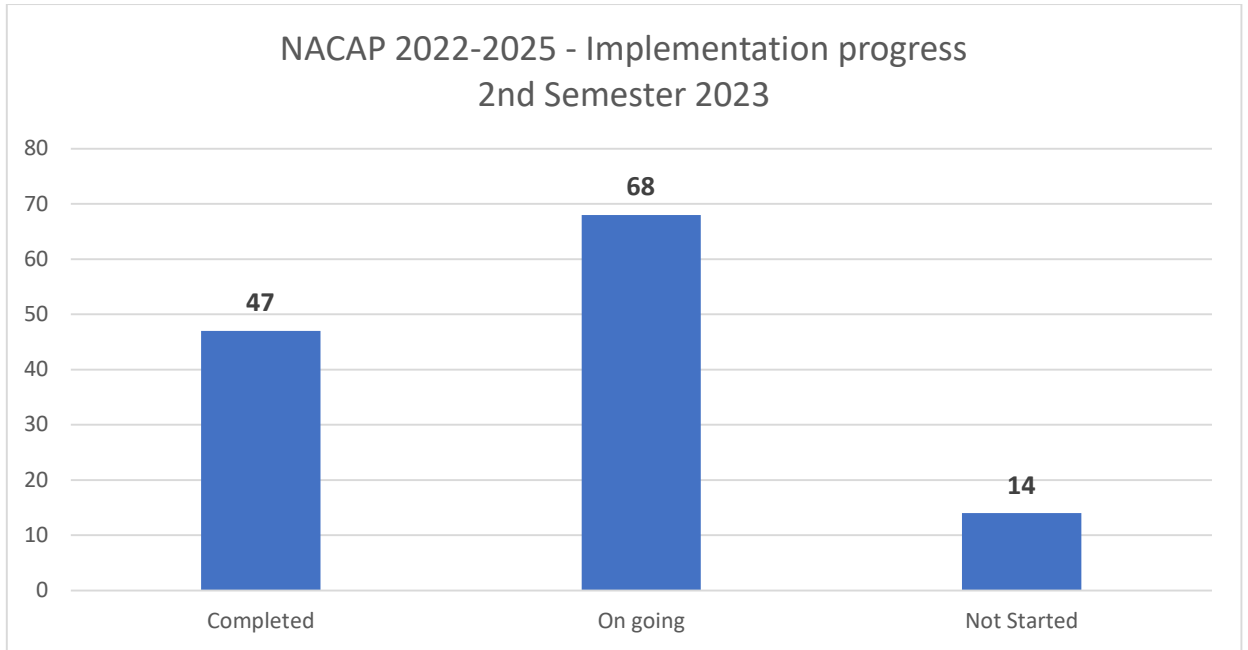Consequently, as of the end of 2023 out of the 129 actions of NACAP 2022-2025:

✓ Forty-seven (47) actions are completed,
✓ Sixty-eight (68) actions are on-going, and
✓ Fourteen (14) actions have not yet started.

Out of the forty-seven (47) actions completed:

✓ Twenty (20) actions are related to the Strategic Objective "Enhancing the Audit/Investigations Framework for the Combat of Fraud and Corruption"
✓ Twenty-three (23) are related to the Strategic Objective "Strengthening Integrity, Accountability and Transparency", and
✓ Four (4) are related to the Strategic Objective "Engaging citizens in the fight against corruption"

It should be noted that out of the fourteen (14) actions whose implementation has not yet started, nine (9) have a later starting date since their initial design. Slight delays are noticed in the implementation of only five (5) actions and are mainly due to procedural delays.

NACAP 2022-2025 - Implementation progress
2nd Semester 2023

Implementation Progress per Strategic Objective
2nd Semester 2023

	Enhancing the Audit/ Investigations Framework for the detection of Fraud and Corruption	Strengthening Integrity, Accountability and Transparency	Engaging citizens in the fight against corruption	Total
Completed	20	23	4	47
On-going	27	30	11	68
Not started	2	11	1	14
Total	49	64	16	129

The main outputs of NACAP 2022-2025 recorded for the second semester of 2023 are summarized in the following table, and described in the following sections:

OUTPUT INDICATORS NACAP 2022-2025	2nd SEMESTER 2023
Legislative - Regulatory Interventions	3
Digitized Administrative Processes	74
Development/Upgrading of Integrated Information Systems	3
Development/Upgrading of digital tools	24
Actions to implement the Internal Control System	13
Codes of Ethics	23
Tools / standards / methodologies	14
Reports/Reports/Studies	5
Training Programs for Combating and Preventing Corruption	33
Number of training modules developed /updated	3
Number of communication strategies and action plans developed	2
Number of Raising Awareness Actions	6
Number of units of raise awareness material developed	100
Number of Public Administration officials trained	790

Investigation / Control

➢ The development of an **Audit Management Information System in the Agri-Food Sector** was completed. The project is part of the wider Ministry's transition to a modern digital environment allowing for interoperability with other public data bases, with enhanced safeguards of security and transparency. The Information System effectively supports the design of an audit strategy and enables the Ministry to effectively meet its reporting obligations to the Greek and European authorities. In addition, it increases the effectiveness of supervision over the performed audits and digitizes a significant part of central and regional inspections (Action 1.4.9).

➢ The online platform that NTA employs as the **central external channel for the protection of whistleblowers is fully operational**. The platform is a web-based system for receiving and managing reports, which ensures the anonymity of the whistleblower if he/she does not wish to disclose his/her identity, as well as the non-traceability of his/her identity by technical means. The electronic platform enables anyone who wishes to do so to report, either anonymously or by name, any breach of EU law that they have become aware of in the course of their work activities, in a secure and confidential environment. Upon completion of the reporting process, the individual who made the report can monitor its progress, with secure access to a personal mailbox on the online platform, using a unique code, which is issued upon successful submission of the report. Through the electronic platform, the possibility of a two-way and anonymous communication with the NTA officials responsible for receiving and monitoring external reports in accordance with the provisions of Law no. 4990/2022. The software application is designed to be user friendly and is installed at the NTA server.

➢ A Programme Agreement was signed between the National Transparency Authority, the Information Society S.A., and the Ministry of Interior for the development of an Integrated Information System for the

Management of Audits and Inspections and of an artificial intelligence tool to further enhance the audit procedures of the NTA. Among other features, the implementation of the project will result in accelerating the completion of audits and inspections, thus improving the quality of audits and investigations (Action 1.4.18).

Prevention

- A general **methodology and standardization of procedures for the implementation of Public-Private Partnership (PPP) projects** was developed. The objective of the action was to provide technical, financial and legal support to the relevant General Secretariat for the proper and transparent management of PPP projects.

  Within the framework of Action 2.2.13 the following were developed:

  i.   A standard model of costs estimation, analyzing construction, design, maintenance, and other costing elements of PPP projects,
  ii.   A standard financial management model,
  iii.   Mapping of legal and institutional issues that may arise and whose resolution/coverage is a prerequisite for implementing projects as PPP projects,
  iv.   Standardized guidelines for the preparation of PPP project proposals in accordance with Law 3389/2005,
  v.   Standardized guidelines for the evaluation of PPP projects proposed by institutions,
  vi.   Standardized tender documents, and relevant draft contracts for potential PPP projects,
  vii.   Standardized technical specifications and
  viii.   Standardization of the monitoring procedure regarding the implementation of PPI contracts.

- The **Integrated Project Management Information System for all projects funded by the Recovery and Resilience Fund is fully operational** and is accessible by the competent authorities. This system will allow all audit authorities to carry out audits both for prevention and detection regarding fraud and corruption, double funding, as well as incidents of conflict of interest. In addition, officials or authorized bodies of the European Commission, the European Public Prosecutor, OLAF, and the European Court of Auditors have gained access. The Information System incorporates and automates the procedures described in the RRF Management and Control System Procedures Manual. The use of the Information System is of high added value, inter alia, in the initial procedures for the approval of funding, overview of the issuance of grant project calls, contracting and monitoring of projects implementation, in the context of certifying sound financial management and protection of the financial interests of the Union. In addition, the information system is interconnected and interoperates with other public databases and information systems collecting supplementary data regarding the implementation or RRF projects (Action 2.4.10).

- The development of the **manual for the management of fraud and corruption cases** was completed for strengthening accountability and integrity mechanisms in the public sector. In this regard the manual also describes:

  - the obligations of the senior and middle management, and employees of the entities under the Article 14 of par.1 (a) of Law No. 4270/2014 (A' 143),
  - the necessary prevention and deterrence measures to be adopted with the occurrence or the suspicion of occurrence of an incident of fraud and corruption. (Action 2.3.12).

➢ **Manuals for the certified training of Integrity Advisors** based on the new legislative framework established by Law 4990/2022 and Law 4829/2021 and the amendment of Law 4795/2021 were completed.

➢ The **implementation of the «three lines of defense» model** as part of the internal control system of the **Ministry of Rural Development** has been also completed. Following a mapping exercise of the current situation, a risk management methodology was developed, supplemented by a set of proposals aiming to improve the conduct of audits. Moreover, a manual has been published regarding the performance of internal audits and inspections. Finally, with the development of an Integrated Management System in mind, the operational requirements were defined (Action 2.3.16).

➢ The **integration of the digital platform "eDiplomas" into the Single Digital Portal (SDG)** of Public Administration gov.gr has been completed. As a result, the verification of copies of university diplomas is carried out by any public or private entity using only the unique verification identification number provided by the SDG. In addition, copies of the diplomas that are downloaded from the "eDiplomas" platform can be annotated with the Hague Apostille without the requirements of any further procedures (Action 2.4.12).

Raising Awareness

➢ Within the framework of NTA's Communication and Awareness Raising Strategic Plan, detailed **annual operational plans** were developed with the cooperation of communication experts, incorporating specific and time bound actions and interventions for reaching out both to the broader public, as well as to targeted audiences such as the academic and the sports community (Action 3.1.11).

➢ The National Transparency Authority and the Association of Compliance Officers in Greece organized a **workshop with the topic: "Conflict of Interest: Regulatory Framework & its Practical Application in the Public & Private Sector".** The workshop gave the opportunity to public and private sector stakeholders to discuss modern methodologies and methodologies towards more effective control mechanisms in situations of conflict of interest (Action 3.1.5).

National Integrity System (NIS)

The NIS constitutes an intervention of strategic importance within NACAP 2022-2025 including a coherent set of actions for the strengthening of integrity and accountability within the Public Sector.
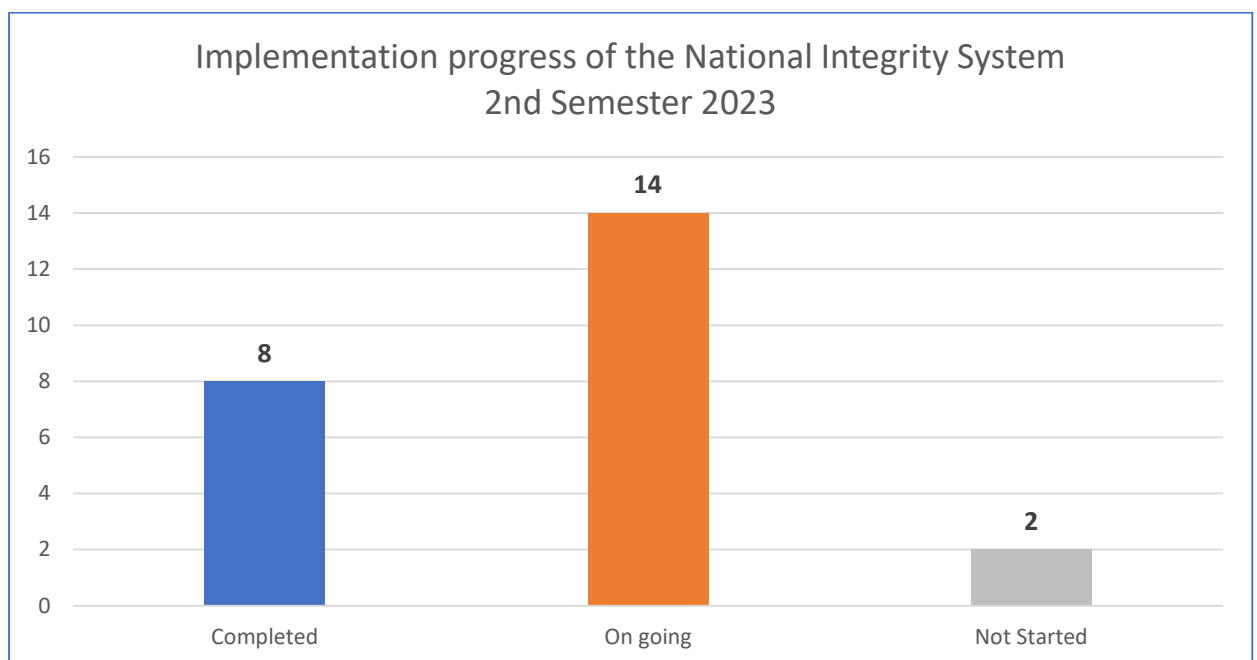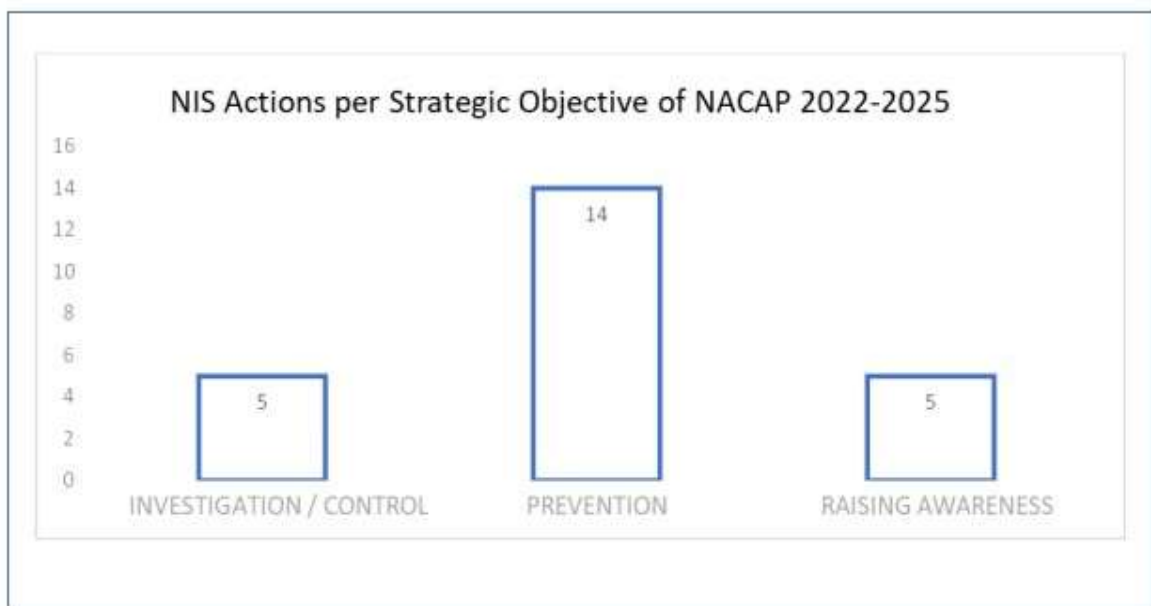
As such, the implementation progress of the related actions is monitored through NACAP 2022-2025 and summarized in its biannual Reports.

According to the initial design, NACAP 2022-2025 includes twenty-four (24) actions linked to the priorities of the NIS -as identified in the Memorandum of Cooperation signed between the Ministry of Interior and the NTA- and concern:

➢ Regulatory interventions in policy fields such as internal auditing, regulation of lobbying activities, gift policy, conflict of interests, the institution of Integrity Advisors, whistleblowers protection and the updating of provisions of the Disciplinary Law for public officials.

➢ The development of Information Systems to support the regulatory interventions mentioned (Transparency Register, upgrading of asset declaration -e-pothen- digital platform).

➢ The building of public administration executives' capacities through targeted training and awareness raising activities.

The NIS actions are distributed among the three Parts of NACAP, as follows:

➢ Investigation/Control: Five (5) Actions,
➢ Prevention: Fourteen (14) Actions,
➢ Raising Awareness: Five (5) Actions.

NIS Actions per Strategic Objective of NACAP 2022-2025

Implementation progress of the National Integrity System
2nd Semester 2023

During the fourth consecutive semester of NACAP's implementation, further progress has been made regarding the implementation of the NIS actions. More specifically:

➢ In the framework of upgrading the asset declaration platform "e-pothen", a Programme Agreement was signed between the National Transparency Authority, the Ministry of Interior and the Ministry for Digital Governance. The agreement provides a roadmap of the necessary actions for the modernization of the platform to fully meet the requirements of the recently amended regulatory framework (Action 1.4.14).

➢ With Law 4990/2022, NTA was appointed the external channel for the submission of reports by whistleblowers. On this basis, an online system for the management of whistleblowers complaints was developed and set in motion. The system ensures whistleblower anonymity, provided that he/she does not wish to disclose his or her identity, as well as the non-traceability of his/her identity by technical means (see Action 1.4.15).

➢ The implementation of the action "Strengthening the Framework for Integrity, Transparency, and Anti-Corruption," funded by the "Good Governance, Institutions, Transparency" Programme under the EEA Grants - European Economic Area (EEA) Financial Mechanism 2014-2021, that focuses on mapping the existing institutional and legal frameworks is ongoing. The project also aims to develop proposals and practical tools for regulating conflicts of interest and enhancing the integrity of public officials and functionaries. In this context, the NTA is collaborating with the OECD to produce several key outputs including: Mapping national frameworks and international practices for identifying, disclosing, addressing, preventing, detecting, and managing existing and potential conflicts of interest, proposing possible legislative changes, best practices, and tools related to conflict of interest management along with the development of an online training tool for public officials (Action 2.2.20).

➢ The National Transparency Authority, in cooperation with the National Centre for Public Administration and Local Government, has conducted a comprehensive mapping of the educational needs and updating requirements in the field of public integrity. Following this assessment, and upon the proposal of the National Transparency Authority, a specific teaching module focusing on promoting transparency, accountability, and integrity has been incorporated into the relevant curricula (Action 2.3.9).

➢ The development of a manual for the unified regulation of issues related to the management and response to fraud and corruption has been completed. This initiative aims to strengthen accountability and integrity mechanisms within public sector bodies (Action 2.3.12).

➢ Aiming to highlight the important role of whistleblowers and to provide information on the available means for submitting anonymous complaints, the National Transparency Authority organized a seminar on "Whistleblowing & Transparency." This event took place on September 10th, 2023, as part of NTA's events organized during the 87th Thessaloniki International Fair (Action 3.1.3).

Conclusions - Recommendations

The response of the implementing bodies was comprehensive during the stocktaking process for the second half of 2023. Through the electronic platform of the National Transparency Authority, the Progress Report Forms for all actions were submitted within the stipulated deadlines.

The implementation rate stands at 89%, with 68 actions ongoing, 47 already completed, and 14 not yet started.

In the context of identifying risks in the implementation of actions, the most significant uncertainties are associated with co-financed actions due to the complexity of the management framework and the long duration of procurement processes. In this regard, the National Transparency Authority urges the implementing bodies to:

- Expedite the completion of the necessary preparatory steps for the projects included in NACAP 2022-2025 to be initiated within the first half of 2024.
- Emphasize the positive spillover effects and added value of the results of the actions implemented and included in NACAP 2022-2025 by organizing communication activities to raise public awareness.
- Keep a vigilant eye on the progress of NACAP's actions and inform the National Transparency Authority of any deviations from the original design, for assistance and cooperation on taking corrective measures if deemed necessary.

Additionally, within the first half of 2024, technical meetings between the National Transparency Authority and implementing bodies are planned to ensure optimal coordination, as well as successful and timely implementation.

Update of the NACAP 2022-2025

The National Anti-Corruption Strategic Plan 2022 - 2025 constitutes the national framework addressing the phenomenon of corruption in the country and serves as a dynamic tool for promoting public integrity. Midway through the reference period and taking into account the need to adapt the National Anti-Corruption Strategic Plan 2022-2025 to institutional and operational developments that have occurred since its initial approval in March 2022, the National Transparency Authority initiated the update process in the 4th quarter of 2023 in accordance with the provisions of Article 1 of Law 4915/2022.

In this context, NTA launched in Q4 2023 a series of consultations and technical meetings with implementing bodies and Civil Society Organizations with the aim of incorporating new high added value actions into the National Plan and integrating ongoing actions to comprehensively monitor all initiatives developed at the national level in the field of public integrity. The update process will be completed with the submission of a draft for approval to the Central Coordinating Committee of Law 4915/2022 and subsequently to the Council of Ministers.

Annex: NACAP 2022-2025

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
1	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.1	Strengthening the legislative and institutional framework for the recovery and management of assets deriving from criminal activities	Completed
2	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.2	Incorporation of the European Directive 2019/1153 into national law establishing rules to facilitate the use of financial and other information for the prevention, detection, investigation, or prosecution of certain criminal offences and abolition of the Council Decision 2000/642/JHA	Completed
3	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.3	Access to adequate, accurate and up-to-date information on the beneficiaries of legal entities through the Central Registry of Beneficial Owners	Completed
4	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.4	Modernisation of the institutional framework for the operation and monitoring of public enterprises and organisations and public shareholdings	Completed
5	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.5	Ratification of Law for the accession of Greece to the MEDICRIME Convention of the Council of Europe, with the aim of combating counterfeit medical products	On-going
6	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.6	Legislative regulation for the establishment of an external reporting channel for the receipt and handling of reports of violations falling within the scope of Directive 2019/1937 (whistleblowers)	Completed

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
7	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.7	Introduction of a regulation on the obligation of maintaining and publishing a list of sponsorships received by NGOs in the fields of Migration and Asylum	Not started
8	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.8	Issuance of regulatory acts for the application and implementation of provisions regarding the monitoring of disciplinary cases (no. 24, Law 4807/2021)	On-going
9	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.9	Update of regulations and implementation of the licensing process for media service providers, within the framework of regulating the television field	On-going
10	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.1	Strengthening the institutional and regulatory framework	1.1.10	Update of regulations and implementation of the licensing processes concerning radio stations	On-going
11	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.1	Development of a centralised and unified procedure for the management of complaints submitted to the website metoogreece.gr	Completed

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
12	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.2	Development of annual operational audit plans by the National Transparency Authority based on the risk-based analysis and methodology (RBAP)	Completed
13	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.3	Upscaling the mechanism for monitoring disciplinary proceedings in the public sector	On-going
14	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.4	Development of a mechanism concerning the coordination and monitoring of the national anti-fraud strategy implementation, for the protection of the interests of the European Union	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
15	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.5	Issue of a Circular on the cooperation of Greek Embassies with competent anti-corruption agencies abroad on information exchange, in response to the OECD recommendation -3A- of the "Working Group on Foreign Bribery"	Completed
16	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.6	Conduct of inspections, audits and investigations in public and private sector bodies, by mixed teams of auditors, inspectors and executives from agencies and services participating in the NCBAA	On-going
17	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.7	Development and implementation of common audit standards and tools, in the public sector, for the detection and investigation of maladministration, fraud and corruption	On-going
18	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.2	Promoting strategic design and strengthening coordination mechanisms	1.2.8	Update of the IAPR Anti-Corruption Action Plan for the period 2022 - 2025	Completed

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
19	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.1	Access of the Financial Inspectors Officers of the Internal Affairs Service of the MoD to the database of the System of Registries of Bank and Payment Accounts of the General Secretariat on Information Systems (GSIS)	Not started
20	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.2	Development of a methodology for the management of complaints by the Internal Affairs Office of the MoD	Completed
21	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.3	Access of the NTA auditors to the Information System of the General Commercial Registry of the Ministry of Development & Investments	Completed
22	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.4	Annual report of the Inspections & Audits Unit of the NTA - Publication of annual statistical data per Sector, Subsector and Regional Service	On-going
23	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.5	Development of a detailed methodology and of training material for conducting forensic investigations (forensics)	On-going
24	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.6	Implementation of specialized seminars for the use of forensics by NTA's auditors	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
25	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.7	Digitisation of the archive of NTA's audit reports, between the years 2011 and 2020	On-going
26	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.8	Access of NTA's auditors and inspectors to the Information System of IAPR	On-going
27	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.9	Simplification of the procedure concerning the handling of requests for Mutual Legal Assistance based on international treaties	On-going
28	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.3	Enhancing operational capacity	1.3.10	Access of auditors and inspectors of the Inspections & Audits Unit of NTA to the Interoperability Node of the Ministry of Interior	Completed
29	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.1	Design and development of an integrated MIS for the management of assets deriving from criminal activities	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
30	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.2	Provision of a Business Intelligence/Data Analysis System to support the audit work of the IAPR	On-going
31	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.3	Ensuring the quality, reliability and transparency of the services provided by the IAPR, through the development of a content management system (Content Management)	On-going
32	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.4	Development of an Information System for Risk Monitoring and Management in the IAPR	On-going
33	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.5	Development of a digital application for the utilization of the monitoring data concerning the inputs & outputs system of fuels, by the IAPR	On-going
34	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.6	Completion of the digital transformation of the process concerning the monitoring of inventory trading by the IAPR	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
35	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.7	Full operation of "my Data" System and development of a Data Utilization Plan by the IARP	Completed
36	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.8	Development of an e-platform for the submission and management of complaints by the Internal Affairs Office of the MoD	Completed
37	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.9	Development of an Information System for Audit Management in the Agri-Food Sector	Completed
38	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.10	Update of the System for identifying agricultural parcels throughout the Country	On-going
39	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.11	Upgrade and expansion of a monitoring system concerning the activity and operation of regional port authorities - "HERMES-2" system	Completed

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
40	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.12	Expansion of operations and subsystems of digital services under the responsibility of the Port Police through an "e-DLA" platform within the framework of gov.gr	On-going
41	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.13	Development of a digital application for the issuance of annual systemic audit plans of NTA, based on the risk-analysis methodology	Completed
42	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.14	Upgrade of the electronic platform "e-pothen"	On-going
43	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.15	Development of a digital application to support the operation of NTA as a central external channel for the protection of whistleblowers	Completed
44	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.16	Development and upgrade of digital applications within the provisions of article 24, Law 4807/2021 regarding the monitoring of disciplinary cases and the production of statistical reports	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
45	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.17	Development of a digital application concerning the monitoring of the implementation of proposals/recommendations made by NTA's inspectors/auditors - Statistical reports	Completed
46	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.18	Development of artificial intelligence tools (machine learning) for the extraction of data from open databases of Public Administration to enhance NTA's auditing work	Not started
47	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.19	Development of a new IS for the upgrade and coordination of the audit work of the Financial Auditing Committee and the Audit Coordination Committee	On-going
48	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.20	Development of a unified Central Payroll IS for the proper conduct of remuneration of all public sector personnel	Completed
49	INVESTIGATION / CONTROL	Enhancing the Audit/Investigations Framework for the detection of Fraud and Corruption	1.4	Development of digital tools and implementation of digital transformation actions	1.4.21	Digital transformation of the Court of Auditors' Case Management System	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
50	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.1	Implementation of legislative regulations concerning the Office for the Collection and Processing of Statistical Data (JustStat) in the field of Justice	Completed
51	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.2	Drafting, voting and adoption of a code of legislation on the disciplinary law of the members of the Teaching and Research Staff (DEP), Special Education Staff (EEP), Laboratory Teaching Staff (EDIP), Special technical laboratory staff (ETEP) of Higher Educational Institutions	Completed
52	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.3	Codification of legislation: a) Code of Spatial Planning and Urban Planning & b) Forestry Legislation	On-going
53	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.4	Codification of legislation for first- and second-degree local authorities	Not started
54	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.5	Codification/Amendment/Supplementing of the existing general and special provisions of disciplinary law concerning health professionals of the National Health System	On-going
55	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.6	Codification of asylum and legal migration legislation	Completed
56	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.7	Codification of consumer protection legislation	On-going
57	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.8	Drafting of a new Code of Administrative Procedure for the public sector	On-going
58	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.9	Strengthening integrity and accountability mechanisms for public sector's non-permanent staff	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
59	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.10	Integration of the European Media Act "Media Freedom Act"	On-going
60	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.1	Strengthening the institutional and regulatory framework	2.1.11	Institutionalisation of a risk management system in Public Administration	Completed
61	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.1	Pilot implementation of the "Integrity Advisor" in selected public stakeholders	On-going
62	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.2	Development of a mechanism for monitoring the implementation progress of the Internal Control System and the operational effectiveness of Internal Control Units	Completed
63	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.3	Development of the Network of Integrity Advisors in Public Administration	Completed
64	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.4	Evaluation of the National Anti-Corruption Action Plan 2022 - 2025	Not started

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
65	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.5	Preparation and publication of NTA's Annual Report	On-going
66	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.6	Issuance of regulatory acts for the implementation of Law 4795/2021 and operational support of the Internal Control Units in Public Administration bodies (Ministries, Local Authorities, Universities, Independent Authorities, Legal Entities of Public Law)	Completed
67	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.7	Design and development of a system for monitoring and evaluating the National Integrity System in Ministries (Integrity Assessment)	On-going
68	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.8	Development of policies and tools to regulate lobbying	Completed
69	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.9	Development of integrated interventions to enhance the integrity of elected officials of First-Degree Local Authorities	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
70	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.10	Evaluation of the Internal Control System in the field of Financial Management in Ministries	Completed
71	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.11	Development of projects Management and Control System for the Recovery and Resilience Fund - Development of a Procedures Manual	Completed
72	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.12	Development of a strategy on the combat against corruption and fraud during the implementation of actions funded by the Recovery and Resilience Fund	Completed
73	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.13	Development of a general methodology and procedures standardisation for the implementation of public–private partnership projects (PPPs)	Completed
74	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.14	Development and implementation of business ethics, regulatory compliance and witness protection policies and procedures, in The Hellenic Corporation of Assets and Participations S.A. (HCAP) subsidiaries	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
75	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.15	Conduct of a fraud and corruption risk assessment in specific horizontal functions of HCAP's subsidiaries	Not started
76	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.16	Completion of the national cadastre	On-going
77	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.17	Simplification and publication of selected procedures of priority in the National Registry of Procedures	Not started
78	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.18	Expansion of available digital services for citizens and businesses, through the Single Digital Portal of "gov.gr"	On-going
79	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.19	Development of an integrated system concerning technical specifications and pricing of technical projects and studies	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
80	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.2	Promoting strategic design and strengthening coordination mechanisms	2.2.20	Introduction of a regulatory framework and of tools to address conflicts of interest in the public sector	On-going
81	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.1	Drafting of Codes of Professional Conduct for civil servants serving in financial services and construction & licensing services of Municipal Health Centres	Not started
82	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.2	Development of an Ethics and Conduct Code for civil servants working in Procurement Units within the public sector (national central purchasing authorities, Central purchasing authority and contracting authorities / bodies) and / or participating as members in Tender or Acceptance Committees	Not started
83	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.3	Development of a Code of Professional Ethics for sports bodies	On-going
84	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.4	Development of a Code of Conduct for correctional officers	Not started
85	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.5	Development of a Code of Professional Ethics for the employees of the Ministry of Health	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
86	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.6	Elaboration of a Mapping Study of the provisions that regulate issues of conflict of interest / integrity violations in Legal Entities under Private Law supervised by the Ministry of Health and suggestion of improvement measures	Not started
87	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.7	Elaboration of an Evaluation Report, assessing integrity risks in administrative procedures of the Ministry of Health	Completed
88	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.8	Design of a new educational material file for training programs on the disciplinary procedure in the public sector	Not started
89	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.9	Integration of a special teaching section in training seminars, to promote transparency, accountability and integrity, for: a) Heads of Departments & Directorates and b) new entrants	Completed
90	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.10	Update of training manuals for trainers and trainees concerning the Competence Certification Program of Public Sector Internal Auditors	Not started
91	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.11	Actions to support the operation of the Internal Control Unit of the Ministry of Health and its legal entities	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
92	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.12	Development of a Fraud and Corruption Cases Management framework	Completed
93	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.13	Preparation of training manuals for trainers and trainees concerning Professional Competence Certification Program for Integrity Consultants	Completed
94	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.14	Registration of procedures, controls and potential risks in the Ministry of Migration and Asylum	On-going
95	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.15	Operational strengthening of the Internal Control Unit of the Ministry of Shipping	On-going
96	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.16	Implementation of the "Three Lines of Defence" Model in the Ministry of Rural Development	Completed
97	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.17	Actions to implement the Regulation of the European Parliament and of the Council of Europe, on European data governance	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
98	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.3	Enhancing operational capacity	2.3.18	Updating the Code of Conduct for Members of the Government and MPs	Not started
99	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.1	National Codification Portal / Integrated platform for regulatory processes through the evaluation and updating of standards of good lawmaking and legislative & regulatory procedure	On-going
100	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.2	Expansion of the Greek platform "data.gov.gr" for the provision of open public data of high added value	On-going
101	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.3	Upgrading of the "ΔΙ@ΥΓΕΙΑ" program	On-going
102	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.4	Creation of an electronic file for real estate transfers	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
103	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.5	Development of an Integrated Information System for the management and monitoring of Public-Private Partnerships projects	Completed
104	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.6	Expansion of the Integrated System for the Management of Judicial Cases of Civil & Criminal Justice to ensure the full digitisation of the judicial process	On-going
105	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.7	Digital upgrade and expansion of the Integrated System for the Management of Judicial Cases of Administrative Justice (OSDY-DD)	On-going
106	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.8	Development of an "e-NEPA" system for the digitisation of procedures for the establishment and issuance of certificates of Marine Recreational Ship Companies	Completed
107	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.9	Design, implementation and operation of the Integrated Information System for the management and programming of public administration resources (GOV-ERP)	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
108	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.10	Development of an Integrated Project Management Information System for projects financed by the Recovery and Resilience Fund	Completed
109	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.11	Simplification and digitisation of procedures for the registration, management and issuance of certificates by the Registry of Technical Projects	On-going
110	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.12	Upgrade of the online platform "eDiplomas" of Universities	Completed
111	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.13	Preparation of the 5th Action Plan for Open Government - Open Government Partnership (OGP) 2023 - 2025	Completed
112	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.14	Development of a unified Digital Environmental Charter for the monitoring of environmental areas	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
113	PREVENTION	Strengthening Integrity, Accountability and Transparency	2.4	Development of digital tools and implementation of digital transformation actions	2.4.15	Development of an accessible model website (amea.gov.gr) and an accessible information system for the codified legislation on the rights of persons with disabilities	Completed
114	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.1	Development and implementation of annual action plans for raising awareness, information, and publicity in the framework of implementing NTA's Strategic Plan on Information and Awareness-Raising	Completed
115	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.2	Conduct of a survey to investigate the degree of awareness of public servants with regards to: a) corruption among public officials, b) existing tools to tackle them and c) their perceived effectiveness	On-going
116	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.3	Information campaign on the concept of whistleblowers, the institutional means of their protection and their contribution to the fight against corruption	On-going
117	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.4	Organizing public awareness actions on conflicts of interest	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
118	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.5	Co-organisation of training activities between the NTA and the Association of Regulatory Compliance of Professionals of Greece in specialized thematic areas of interest for the prevention and detection of corruption	Completed
119	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.6	Targeted information actions to enhance integrity in the context of corporate social responsibility in the private sector	On-going
120	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.7	Information campaign on "Lobbying"	On-going
121	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.8	Signing of Memoranda of Understanding between NTA and Chambers for the co-organisation of targeted actions/ information interventions, awareness raising and training	On-going
122	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.9	Information campaign for risk management system in public administration	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
123	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.10	Design and implementation of webinars for representatives of associations and chambers to enhance transparency and accountability in the field of public works	On-going
124	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.11	Implementation of information and awareness raising actions on combating corruption and fraud in the MoD's action environment	Completed
125	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.12	Implementation of information and awareness raising actions on corruption in the medical sector and its consequences in the Health System	On-going
126	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.13	Conducting a survey to record the perception of employees in public enterprises, on deontological and ethical issues (business ethics)	On-going
127	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.14	Awareness-raising actions on corruption and its consequences in Universities	On-going

	Part	Strategic Objectives	Specific Objective N/A	Specific Objectives	N/A	Actions	Status
128	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouranging citizen participation	3.1.15	Targeted education and awareness actions to tackle corruption and strengthen integrity in sports	Completed
129	RAISING AWARENESS	Engaging citizens in the fight against corruption	3.1	Raising awareness and encouraging citizen participation	3.1.16	Annual organisation of an information day on the OECD Convention on the Bribery of Foreign Public Servants, for the Ministry of Foreign Affairs officials	On-going