**HELLENIC REPUBLIC**

**NACAP 2022-2025**
**IMPLEMENTATION REPORT**
**2nd SEMESTER 2022**

**NATIONAL TRANSPARENCY AUTHORITY**

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# INTRODUCTION

The present Report summarizes the progress of NACAP implementation for the second semester of 2022.

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 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 (N.I.S.) actions.

**Section 2- Conclusions - recommendations,** which includes the main conclusions from the monitoring process, presents the actions to be updated and summarizes the proposals and recommendations of the implementing authorities for the improvement of NACAP's monitoring.

## 1. Implementation Progress – 2nd Semester 2022

The implementation progress of NACAP 2022-2025 for the second semester of 2022 is satisfactory, considering that within the reference period fourteen (14) actions were completed, bringing the total to twenty-three (23), and resulting in a completion rate of 17,8% at the end of 2022.

Of the fourteen (14) actions completed during the second half of 2022:

- Seven (7) fall under the Strategic Objective "Enhancing the Audit/Investigations Framework for the Combat of Fraud and Corruption", and
- Seven (7) are related to the Strategic Objective "Strengthening Integrity, Accountability and Transparency".

As of the end of 2022, out of the 129 actions of NACAP 2022-2025:

- Twenty-three (23) actions have been completed,
- Eighty-four (84) actions are on-going, and
- Twenty-two (22) actions have not yet started.

In addition, of the twenty-three (23) actions completed:

- Eleven (11) are related to the Strategic Objective "Enhancing the Audit/Investigations Framework for the Combat of Fraud and Corruption"
- Eleven (11) are related to the Strategic Objective "Strengthening Integrity, Accountability and Transparency" and
- One (1) is related to the Strategic Objective "Engaging citizens in the fight against corruption".

It should be noted that of the twenty-two (22) actions whose implementation has not yet started, fifteen (15) -a percentage of 68%-, have a later start date according to the initial design. Slight delays are noticed in the implementation of only seven (7) actions and are mainly due to delays related to the completion of tendering procedures.

## NACAP 2022-2025- Implementation progress
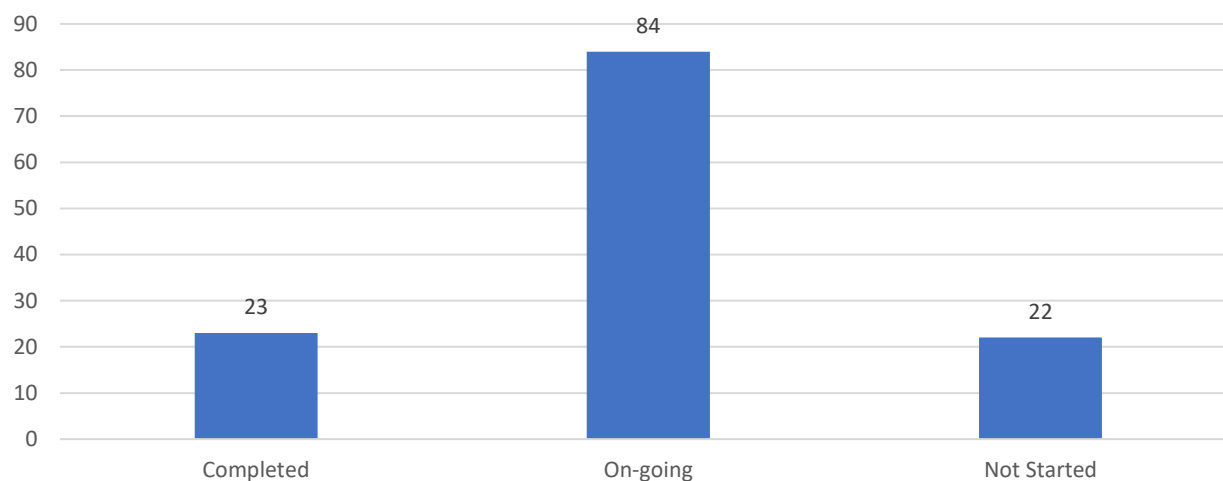


## Implementation Progress per Strategic Objective
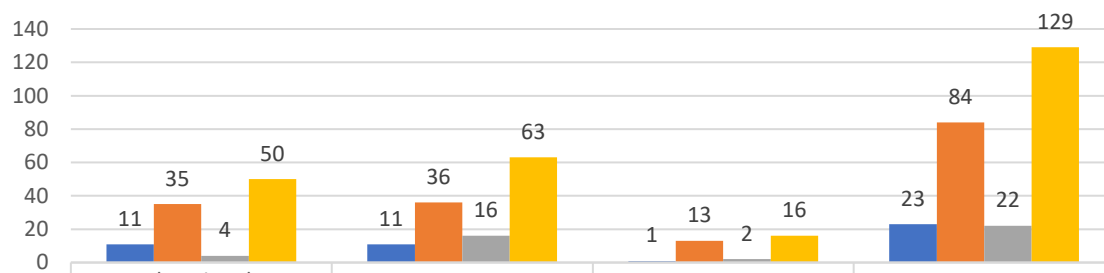


|  | Enhancing the Audit/Investigations Framework for the Combat of Fraud and Corruption | Strengthening Integrity, Accountability and Transparency | Engaging citizens in the fight against corruption | Total |
|---|---|---|---|---|
| Completed | 11 | 11 | 1 | 23 |
| On- going | 35 | 36 | 13 | 84 |
| Not Started | 4 | 16 | 2 | 22 |
| Total | 50 | 63 | 16 | 129 |

NATIONAL TRANSPARENCY AUTHORITY

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

| OUTPUT INDICATORS NACAP 2022-2025 | VALUE |
|---|---|
| Legislative - Regulatory Interventions | 26 |
| Codifications of legislation | 1 |
| Digitized Administrative Processes | 114 |
| Sectorial Anti-corruption Strategies | 2 |
| Actions to upgrade the operational capacity of control mechanisms | 1 |
| Development/Upgrading of Integrated Information Systems | 6 |
| Development/Upgrading of digital tools | 32 |
| Actions to publish and utilize open data | 3 |
| Actions to develop the Network of Integrity Advisors | 2 |
| Actions to implement Risk Management Tools | 2 |
| Actions to implement the Internal Control System | 22 |
| Surveys/Polls | 2 |
| Codes of Ethics | 25 |
| Training Programs for Combating and Preventing Corruption | 97 |
| Number of Public Administration officials trained | 300 |
| Tools / standards / methodologies | 26 |
| Reports/Reports/Studies | 6 |
| Raising Awareness Actions | 41 |

## Investigation / Control

➢ Law 4972/2022 (A΄181), "Corporate governance of Public Corporations and of other Subsidiaries of the Hellenic Corporation of Assets and Participations S.A. (HCAP)... and establishment of an Independent Credit Evaluation Authority, establishment and operation of a Central Credit Registry, Supplementary State Budget for the year 2022 and other financial and growth provisions" was published. Law attempts to modernize the legislative framework regarding the organization and operation of the Public Corporations and of other Subsidiaries of the Hellenic Corporation of Assets and Participations S.A. (HCAP), through the uniform regulation of issues related to the operation and management of public corporations, in accordance with the principles of corporate governance, transparency and accountability, as well as the OECD guidelines (Action 1.1.4).

➢ Law 4990/2022 (A΄ 210) "Protection of persons who report breaches of Union law - Incorporation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (L 305) and other urgent regulations" was published. The aim of the law is to ensure an integrated

framework for the protection of persons who report breaches of EU law and the incorporation / transfer of the relevant Directive, through the development of a system for internal and external reporting, for the protection of persons who report such violations (whistleblowers), the organization of the process of submitting, receiving and monitoring reports and the sanctions imposed in case of violation of the law (Action 1.1.6).

➢ The Ministry of Foreign Affairs issued No. 2273/2022 circular for the cooperation of Greek Embassies abroad with competent anti-corruption services in the field of information exchange, implementing the recommendation -3A- of the OECD "Working Group on Foreign Bribery". The circular attempts to draw the attention of all Greek authorities located abroad so as all the complaints concerning bribery or attempted bribery of foreign public officials, as well as any relevant information published in the local media is recorded and immediately reported to the competent Greek authorities (Action 1.2.5).

➢ The Independent Authority for Public Revenue (IAPR) updated its Operational Plan for Combating Corruption (Action 1.2.8).

➢ Following an official request of NTA, the Authority's auditors and investigators acquired access to the General Commercial Registry (G.E.MI.) of the Ministry of Development & Investments (Action 1.3.3).

➢ The development of an electronic platform for submitting and managing complaints was completed by the Internal Affairs Department of the Ministry of National Defense, while a corresponding email address for submitting complaints was also developed: kataggelies@mod.mil.gr, to be exclusively managed by the Internal Affairs Department of the Ministry. Also, through accessing the Ministry's website https://www.mod.mil.gr/wpcontent/uploads/2022/04/ katagelia.pdf, information is provided to all interested parties on the steps for submitting complaints (Action 1.4.8).

➢ NTA developed a digital application for monitoring the implementation of the proposals/recommendations of NTA's auditors/investigators and the production of statistical reports (Action 1.4.17).

## Prevention

➢ Law 4957/2022(A΄141) "New Horizons in Higher Education Institutions: Strengthening the quality, operation and connection of HEIs with society and education" was published. This aims to enhance the operational capacity of HEIs, through an integrated approach for the upgrade of the quality of their educational and research work. It also aims to improve their operation through

providing a concise framework for their organization and operation, which - among others - includes the introduction of a new merit-based method for electing and developing teaching and research personnel, strengthening transparency and accountability in higher education (Action 2.1.2).

➤ The NTA, following the publication of the "Maturity Assessment Report of the Internal Control System for the Financial Management of Central Administration Bodies", proceeded with the implementation of a pilot project to assess the maturity of the Internal Control System (ICS) of Ministries, within the Ministries of Labor and Social Affairs, Health, and Digital Governance. The pilot program was completed and a report was produced entitled: "Internal Control System Maturity Assessment - Pilot Implementation" (Action 2.2.2).

➤ A series of regulatory acts were issued for the implementation of the provisions of Law 4795/2021 regarding the establishment of the Internal Control System, which include:

- NTA's consent on the establishment of Audit Committees in Independent Authorities, Universities, institutions supervised by the Ministry of Health, Local Administration Authorities of first and second degree and their supervised Legal Entities.

- Ministerial Decision for the specification of the criteria for the establishment of Internal Audit Units in Local Administration Authorities of first and second degree and their supervised Legal Entities (Government Gazette B΄6506/19.12.2022)

- Common Ministerial Decision on the Establishment of Audit Committees in Ministries (Government Gazette B΄3816/21.07.2022).

- Ministerial Decision on the criteria for the establishment of Internal Audit Units in the entities supervised by the Ministry of Health (Government Gazette B΄3448/04.07.2022)

- A Circular Draft for the conduct of disciplinary and criminal investigations by the Internal Audit Units established based on the provisions of article 39 of Law 4622/2019.

At the same time, two (2) relevant cycles of training programs were implemented (Certification of audit proficiency for public sector's Internal Auditors) as well as the second cycle of the Network of Public Administration's Internal Auditors training workshops (Action 2.2.6).

➤ Regarding the introduction of an integrated framework for the regulation of lobbying, following the issuance of Law 4829/2021 (A΄166):

▪ A set of decisions were issued for: a)  the specification of issues related to the operation of the Transparency Register (Government Gazette B' 2604/2022), b) the specification of details for drafting  a Code of Conduct for lobbyists (Government Gazette B' 2101/2022), c) the specification of the terms, conditions and details of registration in the Transparency Register (Government Gazette B' 1751/2022), d) the definition of the procedure for submitting, examining reports and complaints and imposing sanctions for the violation of the obligations arising from Law 4829/2021 (Government Gazette B' 12058/2022) and e) the definition of the institutional bodies of par. b' of Article 3 of Law 4829/2021 and the sanctions imposed in case of violation of their obligations related to Article 5 (Government Gazette B' 2293/2022).

▪ A Transparency Register was developed and is accessible via NTA's website for the register of lobbyists and lobbying activities. The objective of the Register is to ensure transparency and integrity in the decision-making process in the public sector and to encourage the participation of citizens in the design and monitoring of public policies. The Registry became operational with the No. 41941/8-12-2022 Act of NTA 's Interim Governor (Online Publication Number: ΟΥΚΝΑ46ΜΙ0Φ-ΣΧΤ) and the registration of lobbyists has begun.

▪ According to the No. ΓΓΑΔΔΤ 246/6415 Decision of the Minister of Interior for the specification of details concerning the preparation of a Code of Ethics for lobbyists, the NTA in cooperation with the Ministry of Interior, academics and Civil Society Organizations issued the respective Code of Ethics, which was approved by NTA's Interim Governor Decision No. 41368/5-12-2022 (Online Publication Number: ΣΤΥΤΝΔ46ΜΙ0Φ-Γ7Μ).

▪ During the 2nd Integrity Forum organized by NTA on the International Anti-Corruption Day on 9th December 2022, issues related to the regulation of lobbying activities were thoroughly discussed with the aforementioned progress being also presented (Action 2.2.8).

➢ The publication of the Evaluation Report and the Action Plan on addressing integrity risks in the administrative procedures of the Ministry of Health were completed (Action 2.3.7).

➢ The development of the "e-NEPA" system for the digitization of procedures for establishing and issuing certificates of Maritime Companies with Pleasure Vessels was completed and is now operational (Action 2.4.8).

➢ The development of the model accessible website https://amea.gov.gr/ (informative digital portal for people with disabilities) was completed (Action 2.4.15).

## Raising Awareness

- ➢ The Ministry of Culture and Sports continues to implement targeted actions to combat corruption and strengthen integrity in sports. In particular:

  - ▪ Law 4908/2022 (A' 52) with regards to Measures to tackle with violent fan behaviors in sports, the strengthening of the institutional framework for the operation of fan clubs, sports volunteering, spiritual sports, electronic sports (e-sports), work sports and provisions for the modernization of sports legislation and other relevant issues was published.
  - ▪ To protect children from sexual abuse and exploitation, the Ministry proceeded in signing a series of memoranda with the Secretariat General of Demographic and Family Policy and of Gender Equality, the Family and Child Care Center, the "Smile of the Child" and the Greek Red Cross.
  - ▪ A website for the Register of Sports Associations, and a digital center for the support of sports (Helpdesk) were developed.
  - ▪ Presentation of video spots on the prevention of violence/abuse, of corruption and of doping, through social media.

In addition:

- ➢ Within the framework of the National Sports Integrity Platform (N.S.I.P.):

  - ▪ Educational material for athletes -which was updated and is now available in English as well- coaches and sports organizations, and an e-learning educational platform were developed, while cards from the RED BUTTON application for anonymous reports were distributed to athletes. At the same time, an explanatory video was created for the use of the RED BUTTON application.
  - ▪ A tailormade training program was developed by the National Center for Public Administration and Social Local Government explicitly for the Secretariat General of Sports, entitled "Violation of Children's Rights. Phenomenology and the Child Protection Framework" which was attended by executives, coaches, and board of directors' members of national sports federations and athletic stadiums.

- ➢ Also, within the framework of the operation of the National Anti-Doping Organization (EOKAN), a Cooperation Agreement was signed with the Czech Anti-Doping Commission (Action 3.1.15).

## National Integrity System

The National Integrity System (N.I.S.) constitutes an intervention of strategic importance within NACAP 2022-2025 and includes a coherent framework of actions concerning the Public Administration and focusing on strengthening the integrity and accountability of public sector entities.
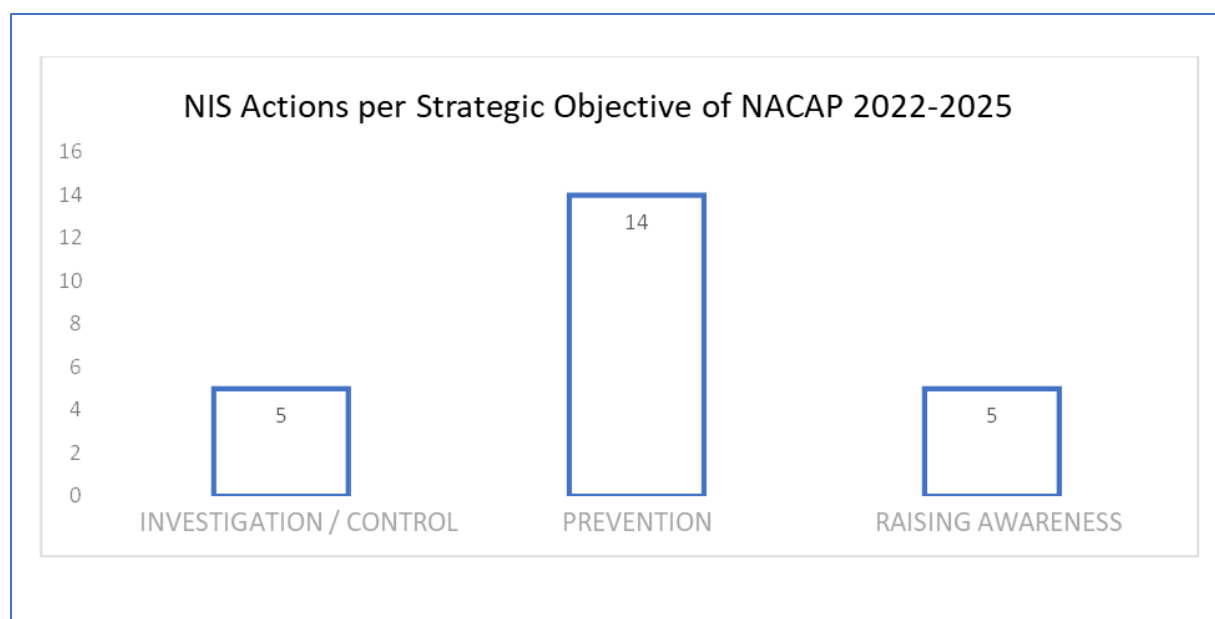
The implementation progress of the aforementioned actions is monitored through NACAP 2022-2025 and summarized in its biannual Reports.

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

➢ Regulatory interventions in policy fields such as internal auditing, regulation of lobbying activities, gift policy, conflict of interests, institution of Integrity Advisors, whistleblowers protection and updating of the 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 development of methodological tools and guidelines to strengthen the mechanisms of integrity and accountability.

➢ The upgrading of the capacities of executives of public administration, through targeted training and awareness raising activities.

The above-mentioned 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.

During the second semester of NACAP's implementation, further progress has been made regarding the implementation of the N.I.S. actions. More specifically:

➢ Following the issuance of Law 4807/2021 (Α΄ 96), concerning the development of the "e-Peitharxika" platform for the comprehensive and real-time monitoring of disciplinary cases, and the Joint Decision of the Minister of Interior and NTA's Governor No. DIDAD/Φ.58/939/οικ.3131/01-03-2022 (Government Gazette B' 1040/08-03-2022), for the regulation of special issues on the operation and management of the platform, the Joint Circular of Secretary General for Human Resources in the Public Sector and NTA's Governor, No. DIDAD/F.69/ 207/ok.8955/03-06-2022 ( Online Publication Number:: 6O3H46MTΛ6-361) was issued, in which the procedure for registration and access to "e-Peitharxika" platform is further elaborated (Action 1.1.8).

➢ The process of ensuring NTA's auditors/inspectors' access to the central system for collecting and processing financial data of Local Administration Authorities -Interoperability Hub- of the Ministry of Interior is in progress (Action 1.3.10).

➢ Following  No. 1381Εξ/14-1-2022 Joint Decision of the General Secretaries for Digital Governance and Simplification of Procedures of the Ministry of Digital Governance and Human Resources of Public Sector of the Ministry of Interior for the establishment of a Special Committee for the elaboration of a new Code of Administrative Procedure, the drafting of the new Law as well as of the Regulatory Impact Analysis have been completed and have been sent to the General Secretariat of Legal and Parliamentary Affairs (Action 2.1.8).

➢ The preparation of a Draft Law on the establishment of a risk management system in the public administration was completed (Action 2.1.11).

➢ Within the framework of the pilot implementation of the Integrity Advisor institution, the first Independent Integrity Advisor Offices were established and the first Advisors[1] have been appointed (Action 2.2.1).

➢ The NTA, within the framework of developing and monitoring the implementation of the National Internal Control System in Public Administration, published a Maturity Assessment Report of the Internal Control System - Pilot Implementation (Action 2.2.2- see Part *Prevention*).

➢ The Maturity Assessment Report of the Internal Control System for the Financial Management of Central Administration Bodies was also completed (Action 2.2.2- see also Part *Prevention*).

➢ New regulatory acts for the implementation of Law 4795/2021 and the support of the operation of the Internal Audit Units in Public Administration bodies were issued. During the semester of reference:

  ▪ Two (2) Ministerial Decisions were issued on the specification of the prerequisites and criteria for the establishment of Internal Audit Units for: a) the entities supervised by the Ministry of Health (Government Gazette B΄3448/04.07.2022) and b) the Local Administration Authorities of the first and second degree and their supervised legal entities (Government Gazette B΄6506/19.12.2022), as well as a Joint Ministerial Decision

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[1] 1. Region of Crete: a. Under the decision of the Minister of the Interior (B'5449/2021), the Independent Office of Integrity Advisor was established b. With No. 5836/1.3.2022 (ΑΔΑ:95ΞΑ46ΜΙ0Φ-ΟΗ5) Call for Expression of Interest, the time, the procedure and evaluation criteria for interested parties' applications, as well as any other relevant issues were specified c. the selection process by the Three-member Evaluation Committee of par. 2 of article 28 of Law 4795/2021 has been completed d. the appointment of the Integrity Advisor has been completed (Protocol no. 21964/14-7-2022).
2. University of Western Attica: a. Under the decision of the Minister of Interior (B'2113/2022) the Independent Office of Integrity Advisor was established b. With No. 16444/6.6.2022 (ΑΔΑ: Ψ4Ο046ΜΟΦ-ΕΟ6) Call for the expression of interest, the time, the procedure and the evaluation criteria for interested parties' applications, as well as any other relevant issues were specified.
3. Municipality of Mykonos: Under the decision of the Minister of Interior (B'2300/2022), the Independent Office of Integrity Advisor was established.
4. Municipality of Chalkida: Under the decision of the Minister of Interior (B'2082/2022), the Independent Office of Integrity Advisor was established.
5. University of Thessaly: Under the decision of the Minister of Interior (B'2300/2022) the Independent Office of Integrity Advisor was established
6. NTA: Under the decision of the Minister of Interior (B'2114/2022) the Independent Office of Integrity Advisor was established.
7. Region of Crete: The recruitment of the Integrity Advisor's position has been completed (placement decision 21964/14-7-2022).

on the Establishment of Audit Committees in the Ministries (GG B΄3816/21.07.2022).

- ▪ The NTA's Governor consent on the establishment of Audit Committees in Independent Authorities, Universities, institutions supervised by the Ministry of Health, Local Administration Authorities of the first and second degree and their supervised legal entities were issued (Action 2.2.6- see also Part *Prevention*).

- ➢ Finally, regarding the introduction of an integrated framework for the regulation of the action of lobbyists:

  - ▪ Five (5) decisions were issued to specify the provisions of Law 4829/2021.
  - ▪ A Transparency Register was created and is accessible via NTA's website.
  - ▪ A Code of Ethics for lobbyists has been drafted.
  - ▪ Events for the information of public about the initiatives that have taken place for the regulation of lobbying at the national level were organized (Action 2.2.8- see also Part *Prevention*).

It should be noted that given that the N.I.S. was issued with a Ministerial Decision (No. ΓΓΑΔΔΤ 707/18852/1.12.2022, GG B΄ 6312) which lists explicitly the N.I.S actions, NACAP 2022-2025 is going to be updated for the actions of the two to be fully aligned.

## 2. Conclusion remarks

The implementation of NACAP 2022-2025 is progressing steadily, as the great majority of the actions have started their implementation and have produced their first outputs. 65% of its actions have already begun implementation and 17,8% have already been completed.

According to the data submitted, no serious risks or delays seem to be noticed. This finding is also documented by the limited number of twenty (20) actions, for which the competent implementing bodies have submitted a modification or an update request. The majority of those requests mainly concern the update of the implementation timeframe.

In more detail:

➢ Nine (9) requests are related to the updating of the implementation timetable.
➢ Two (2) requests are related to the need for adjusting the title of the action.
➢ Four (4) requests are related to the updating of other minor details included in the Identification Fiche (implementation steps, implementing Bodies, etc.).
➢ Two (2) requests are related to more important modifications, concerning the content or the recall of an action.
➢ For three (3) actions there is no available data to further document the modification requested.

Finally, it should be noted, that the response of the implementation authorities has been immediate, since:

➢ Progress Report Fiches for all one hundred and twenty-nine (129) actions of the Plan where submitted through NTA's platform https://polls.aead.gr/index.php/417125?lang=el.
➢ No problems or proposals for the improvement of NACAP's monitoring system were submitted.

Annex: NACAP 2022-2025

| Action A/S | 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 | On-going |
| 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 | On-going |
| 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 |

| Action A/S | 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 |

| Action A/S | 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 | On-going |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | On-going |
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 | On-going |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | On-going |
| 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 | On-going |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | Not started |
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | On-going |
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | On-going |
| 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 | Not started |
| 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 | On-going |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | On-going |
| 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) | On-going |
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 | Not started |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | On-going |
| 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 |
| 92 | PREVENTION | Strengthening Integrity, Accountability and Transparency | 2.3 | Enhancing operational capacity | 2.3.12 | Development of a Fraud and Corruption Cases Management framework | Not started |
| 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 | Not started |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | Not started |
| 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 |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 | On-going |
| 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 |

NTA
NATIONAL TRANSPARENCY AUTHORITY

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 | On-going |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | On-going |
| 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 | On-going |
| 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 |
| 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 | On-going |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | Not started |
| 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 |
| 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 | On-going |
| 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 |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 |
| 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 | On-going |

| Action A/S | Part | Strategic Objectives | Specific Objective N/A | Specific Objectives | N/A | Actions | Status |
|---|---|---|---|---|---|---|---|
| 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 | Not started |
| 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 |
| 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 encouranging 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 |

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