



HELLENIC REPUBLIC

NACAP 2018-2021
IMPLEMENTATION REPORT
January - June 2021



NATIONAL TRANSPARENCY AUTHORITY

Executive Summary

During the first half of 2021 the National Transparency Authority (NTA):

a) implemented the first internal evaluation of NACAP. For this purpose, structured questionnaires were sent to the implementing bodies, whose processing, analysis and interpretation highlighted its strengths and weaknesses as well as the challenges faced by the stakeholders during the implementation. The conclusions of the evaluation were a valuable source of feedback on the design process of NACAP for the period 2022-2025 and were reflected in the first Internal Evaluation Report of NACAP.

b) completed the design of the structure and intervention logic of NACAP for the period 2022-2025, which focuses on:

— the austerity and clarity of actions, so that all the structural parameters (of NACAP) are understood by each and every actor involved, but also by every citizen.

— the establishment of a framework suitable for the integration of horizontal as well as targeted interventions to promote national priorities in the fight against corruption.

— the use of synergies and consultation, as a basis for planning, ensuring both the use of the know-how of the competent bodies and their commitment.

— the results and the maximisation of the impact and added value of actions.

With regard to the progress made in the implementation of NACAP 2018-2021, 12

actions were completed during the first half of 2021:

2 concern Sectoral Prevention of Corruption (Part 1).

5 aim to enhance Integrity in Public Administration and the Judicial System (Part 2).

2 aim to strengthening inter-institutional cooperation and coordination (Part 3)

1 is linked to Special Objective 14.1 to strengthen integrity in the Greek education system (Part 4).

2 concern the promotion of the Organisational Change of the NTA (Part 5).

Out of the 147 actions of NACAP 2018-2021:

- ✓ 91 actions have been completed.
- ✓ 51 actions (mainly linked to requests for funding and technical assistance) are under way.
- ✓ 5 actions have not yet been launched.

Out of the 91 completed actions of NACAP 2018-2021:

- ✓ 32 are linked to Specific Objectives for Sectoral Prevention of Corruption (Part 1)
- ✓ 12 are linked to Specific Objectives for the Promotion of Integrity (Part 2)
- ✓ 34 are linked to Specific Objectives for Strengthening Cooperation and Coordination (Part 3)

- ✓ 6 are linked to Specific Objectives for Education and Awareness-Raising of the Public (Part 4)
- ✓ 7 are linked to Specific Objectives of organisational change/operational reforms of the NTA (Part 5)
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Part I Sectoral Prevention of Corruption

The effort to strengthen the mechanisms for the recovery and management of assets is progressing as the Legislative Drafting Committee responsible for shaping the management framework continues its work while the NTA has already submitted a request for funding – through the “Good Governance, Accountability, Transparency” programme of the FM EEA- actions to strengthen the institutional framework and operational coordination of the competent bodies for the management of assets derived from criminal activity (Actions: 1.3.2, 1.3.3, 1.3.5).

Progress is also being made regarding actions linked to the adoption of specific anti-corruption measures in high-risk sectors (Actions 6.1.1-6.2.2, 7.1.1-7.2.2, 8.4.1-8.4.2), implemented through the SRSP2 programme of the EU's Directorate-General for Structural Reform Support and in cooperation with the United Nations Office on Drugs and Crime (UNODC) and the associated bodies, which ends in October.

In the context of Specific Objective 6.2 on awareness of integrity issues in the field of

sport, the NTA, in cooperation with the General Secretariat of Sports, carried out:

A webinar, on May 19, on the occasion of the launch of the National Platform for Sport Integrity (EPATHLA), during which more than a hundred and fifty (150) members of sports federations, clubs, organising authorities and public and private sector officials had the opportunity to learn about the way the platform operates, the need to create and update the Codes of Conduct and Ethics as well as the role of the Integrity Officer in federations. The public who attended the event had the opportunity to participate in electronic voting, through the online platform “Mentimeter”, with the results fueling an interesting exchange of views between the speakers and demonstrating the need to implement the EPATHLA platform.

A webinar on the evaluation system “Chilon” and the audit process in sports federations. The aim of “Chilon” is to design and implement a system of evaluation of sports federations based on specific criteria and data. The programme is a central priority of the General Secretariat of Sports for the objective evaluation of federations and the optimisation of annual regular allocation procedures (action 6.2.2).

Finally, in order to prevent and deal with phenomena of conflict of interest in the public sector, Article 23 of Law 4795/2021 introduces the institution of integrity consultant, with supporting, informative

and advisory responsibilities (actions 9.5.2, 9.5.3).

Part II Integrity in public administration and the judicial system

The effort to strengthen transparency and integrity in the political sector and in public administration, through the National Integrity System, proceeds with the gradual implementation of the individual actions included in the Memorandum of Cooperation between the Ministry of Interior and the NTA (Action 11.1.1). An important step in this effort is the adoption of Law 4795/2021 on the reform of the Internal Control System and the introduction of the institution of integrity consultant (see part I- actions 9.5.2, 9.5.3) as well as the implementation of targeted training activities for public officers on issues of public integrity (Action 11.1.3.). In particular:

On the occasion of the development of a Code of Conduct for Internal Auditors and a Guide for the Management of Corruption and Fraud Risks by the Directorate General of Integrity & Accountability, the National Transparency Authority organized two webinars, on April 20 and 26, under the title **“Code of Conduct for Internal Auditors: An Ethical Compass for Implementing Internal Audit and “Corruption and Fraud Risk Management Guide” From theory to practice”, respectively**

On June 10, a web conference was held, co-organised by the National Transparency Authority and the Central Union of Municipalities of Greece (KEDE),

with the participation of more than three hundred (300) elected officials and local government employees as well as Public Sector officials. The purpose of the webinar “The Internal Control System in Municipalities: legal framework, challenges and prospects” was to present the new Internal Control System for Public Administration and Local Government, as it is formed after the adoption of Law 4795/2021.

Under the auspices of the NTA, the web conference of the Anti-Fraud Institute (ACFE Greece), entitled “How to cure Procurement Fraud”, took place on June 22. The aim of the conference was to highlight the critical points and weaknesses that maximise the risk of fraud in the purchasing-supply-contracts circuit in both the public and the private sector of the country.

With regard to enhancing the effectiveness of the judicial system, the Ministry of Justice is launching targeted interventions towards speeding up the administration of justice, better management of the workload of courts and training and continuing education for judges and judicial staff.

Following the publication of the *Charter of Conduct for the judges of the Court of Auditors*, approved by the decision No. ΦΓ8 / 55595 (GG B '4942 / 9-11-2020) of Court of Auditors' Plenary Session, the Code of Judicial Officers was adopted with L. 4798/2021, (GG A' 68 / 24-04-2021).

A draft law amending the Code on the Organisation of Courts and Status of Judicial Officers has been completed. And is expected to contribute decisively to cut the red tape in the administration of justice (Action 12.2.3). For the same purpose, statistics by degree of jurisdiction for all courts and public prosecutors of the country are posted on the site of the Ministry of Justice (Action 12.1.2).

Finally, with the latest amendment of the Code of Criminal Procedure, the institution of criminal conciliation extends both to a substantive (offences against the Public Sector) and procedural level (after the formal conclusion of the interrogation and until the initiation of criminal proceedings in court) while the institution of criminal negotiation, which applies to the cases of ex officio prosecuted crimes (with the exception of felonies punished with life sentence which are provided for in Article 187A CC) is introduced. In accordance with Article 303 of the Code, until the formal conclusion of the main interrogation or preliminary investigation, the accused person is entitled to request in writing, in person or through legal assistance, that procedure of criminal negotiation be initiated, the subject of which may be only the principal or the ancillary penalty.

The above amendments are expected to contribute, inter alia, to a) quickening the issuance of judicial decisions and b) the decongestion of court cases (Action 12.1.1).

Part III Strengthening cooperation and coordination in the public sector

In order to streamline and increase the effectiveness of the audit work and within the framework of the annual operational targeting, the NTA draws up annual operational plans with quantitative and qualitative indicators for measuring and evaluating the audit work produced. (Action 13.2.9).

In the context of Special Objective 13.8 to meet international anti-corruption standards, the NTA, in accordance with its mission and competence, coordinates and monitors the country's compliance with the recommendations of international organisations and the guidelines of the European Commission both in the context of the monitoring of NACAP and through its participation in a) working groups, notably the OECD Working Group on Bribery in International Business Transactions (WGB), b) the evaluations of the international organisations. In this context, the NTA participated in the 5th GRECO Evaluation Round "Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies" as well as in the on-site visit that took place for the same purpose from 21 to 25 of June 2021 (action 13.8.1).

Part IV Education and awareness-raising of the public

During the reference period of this report, all the actions of Part 4 for education and

public awareness are completed with the delivery by the UNODC of the ZORBS educational series, an educational and at the same time entertaining tool targeted at students, which includes a series of videos, aiming at raising students' awareness and building a culture of zero tolerance to corruption phenomena (Action 14.1.2).

Parallel to the afore-mentioned initiatives NTA implements a series of raising awareness actions.

Part V Organizational Change and Operational Reforms of the National Transparency Authority

The majority of the actions of the fifth part of NACAP have been implemented. The completed actions are supplemented by the elaboration of an Audit Operation Code and the development of an integrated complaint management methodology, aiming to upgrade and increase the effectiveness of the Authority's audit work (Action 15.2.4)

Concluding Remarks

The completion rate of the NACAP is 62%. The design process of NACAP for the period 2022-2025 began in the first half of 2021.

In this context,

the NTA has held 25 working meetings with policy actors and civil society organisations aiming at a broad consultation on the new NACAP and the

specification of targeted actions of high added value. The first draft of NACAP 2022-2025 is expected in the fourth quarter of the year and its content will be approved by a Coordinating Committee, composed of the NTA and representatives of the Prime Minister Office, of the Ministries of Finance, of Justice, of Interior and of Digital Governance as well as of representatives of the Court of Auditors, as observers. The NACAP 2022-2025 will be approved by the Council of Ministers.

An Integrated Management System including standardised procedures for monitoring, evaluation and review of the new NACAP along with an Integrated Indicators System to measure the outputs and the impact of the intervention have been developed.

Furthermore, the Directorate of Strategic Planning & Behavioral Analysis of NTA has designed a standardised Project Fiche Template mapping the key components of each action (stakeholders, physical and financial object, implementation step, deliverables, implementation schedule).



NATIONAL TRANSPARENCY AUTHORITY

📍 195 Lenorman & Amfiaraou,
104 42, Athens
☎ +30 2106470370
☎ +30 2106470375
✉ info@aead.gr
🌐 www.aead.gr