

# Measuring the Implementation and Impact of Integrity Policies in Greece

## OECD Survey Results



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This report is part of the project “Strengthening of integrity, transparency and anti-corruption framework (sub- project: strengthening of the National Framework for Integrity in the Public Sector)” and was produced with generous financial support under the European Economic Area (EEA) and Norway Grants financial mechanism.

This report presents the findings of a survey conducted among employees in the Greek public administration. The survey aimed to assess the level of awareness of relevant integrity laws and regulations as well as the experience and views of Greek officials on several integrity policies. The survey gathered insights into aspects of the National Integrity System (NIS) including reporting channels and whistleblowing, conflicts of interest, asset and interest disclosure, codes of ethics, lobbying activities, internal audits and integrity advisors

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# 1 Introduction

This report presents the findings of the survey conducted among employees in the Greek public administration<sup>1</sup>. for assessing the level of their awareness on relevant integrity laws and regulations as well as their experience and views on the policies developed in the framework of the National Integrity System (NIS). The survey gathered insights into aspects of the National Integrity System (NIS) including reporting channels for breaches of Union law, domestic law violations relating to bribery and influence trading offences<sup>2</sup> as well as incidents of corruption and fraud, conflicts of interest, asset and financial interests' declarations, codes of ethics, lobbying activities, internal audit and integrity advisors.

The report includes descriptive summaries of all questions asked and draws some key findings and recommendations based on international standards and some best practice examples from other countries. The answer options that are presented in the summary are selected among most relevant responses. In addition, the percentages presented in the figures are rounded to the nearest integer. For these reasons the percentages may not always add to one hundred when reading the text.

## Methodology and limitations

The survey was conducted electronically, with participants accessing the questionnaire through a designated platform and was disseminated by the Ministry of Interior. The survey was addressed to public officials of the General Government in Greece. Participation was voluntary and anonymous, with respondents providing answers to a series of multiple-choice questions. The sample size included 3094 respondents from various institutions and Regions within Greece. The survey was conducted by the OECD for the NTA between 09.02.2024 and 19.2.2024. and was co- financed by the EEA Grants 2014-2021, which represents the contribution of Iceland, Liechtenstein and Norway towards a green, competitive and inclusive Europe.

While the sample is large, it was not randomised and therefore the results may not be representative of the whole public sector in Greece. Based on demographic data, post-stratification weights can be applied to adjust estimates. Furthermore, several questions were conditional on the respondent's previous (positive or negative) answer, and therefore have a smaller base than the full sample of 3094.

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<sup>1</sup> Public administration refers to the General Government, as defined by Law 4270/2014.

<sup>2</sup> According to the provisions of Directive (EU) 2019/1937 and L.4990/2022 as amended by art. 20 of L. 5095/2024.

## 2 Summary of key findings

**Reporting violations:** A significant portion of respondents (71%) either were not aware of or only had limited knowledge of legislation protecting whistleblowers who report violations of EU law, indicating a potential lack of understanding of their rights and protections. Similarly, 55% did not know if there is a reporting channel in their institution. However, the majority (52%) of those who said there is a reporting channel rated them as effective or very effective.

**Willingness to Report:** A large majority (62%) expressed willingness to report integrity breaches. Among the small minority (6%) who said they would not report, 50% were concerned about fear of retaliation and 38% expressed doubts about the effectiveness of reporting.

**Conflict of Interest and Financial Declarations:** A slight majority (51%) lacked or had limited awareness of conflict-of-interest regulations, and 66% said they had never faced a conflict of interest situation. However, when it came to the regime of declaring assets and financial interests, a larger percentage (57%) reported being aware at least of the key aspects.

**Codes of conduct and ethics:** A majority of respondents (59%) indicated awareness of the new Code of Ethics & Professional Conduct for Public Sector Officials, and 57% of them evaluated the code as either very or rather effective. Among the minority of officials who said code of ethics is not effective, the most common cause cited (44%) was that it is not enforced.

**Lobbying and influence activities:** Only one in five (20%) respondents are aware of at least key aspects of the law regulating lobbying activities. Limited interactions with lobbyists may be a result of the fact that most of the respondents do not constitute institutional bodies according to the provisions of L. 4829/2021.

**Integrity Advisors and internal audit:** The majority of respondents said they are either not aware of the law introducing the role of integrity advisors (51%) or aware of the law but not sure of its provisions (23%). Among the officials who are aware of the law, a large majority (65%) are not clear on the details. Among the officials who are aware of the role or that at least know that integrity advisors have been established, 72% think that the most important competence of integrity advisors is the timely detection of integrity violations or corruption incidents. With regards to internal audit, a high percentage (51%) indicated that they either don't know or that such a unit does not exist highlighting that additional efforts are required to establish such units or to improve internal communications and visibility of their activities.

# 3 Analysis of Results

## Reporting violations

***Despite the transposition of the EU Directive 2019/1937, more efforts may be required to raise awareness on the protections afforded to officials if they were to report violations of EU law and to strengthen the implementation of the regulations, as a large group of respondents is not aware of the applicable legislation and only a few respondents reported that their institutions had established a reporting channel***

The first series of questions asked in this survey focused on reporting channels for integrity breaches and the protection of Whistleblowers. Providing clear rules and procedures to report suspected violations of integrity standards as well as offering alternative channels are a cornerstone of a robust system of public integrity (OECD, 2017<sup>[1]</sup>). The protection of reporting persons is provided for in the United Nations Convention Against Corruption (UNCAC) and the EU Whistleblowing Directive, among other binding international legal instruments.

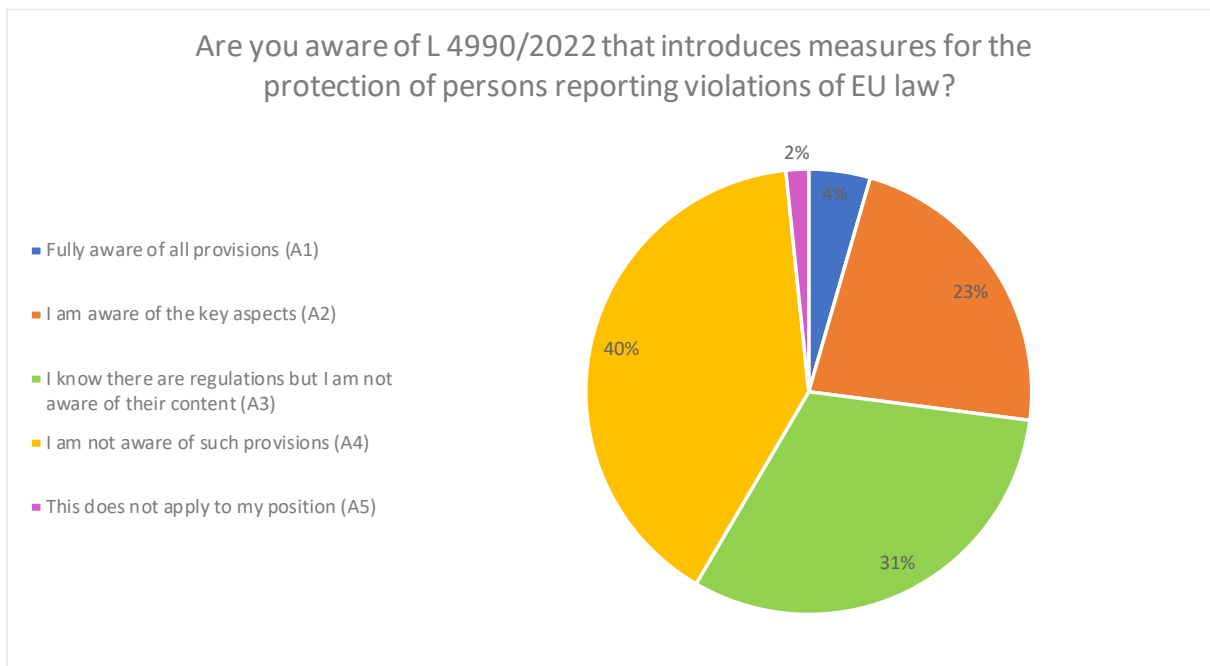
As shown in Figure 3.1, the largest group of respondents (40%) indicated that they are not aware of the legislation on the protection of persons reporting violations of EU law. A further 31% stated that they know there are regulations, but are not aware of their content. Only 27% of respondents said that they are either fully aware of all provisions or aware of the key aspects<sup>3</sup>.

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<sup>3</sup> Sum of percentages for combined answer options.



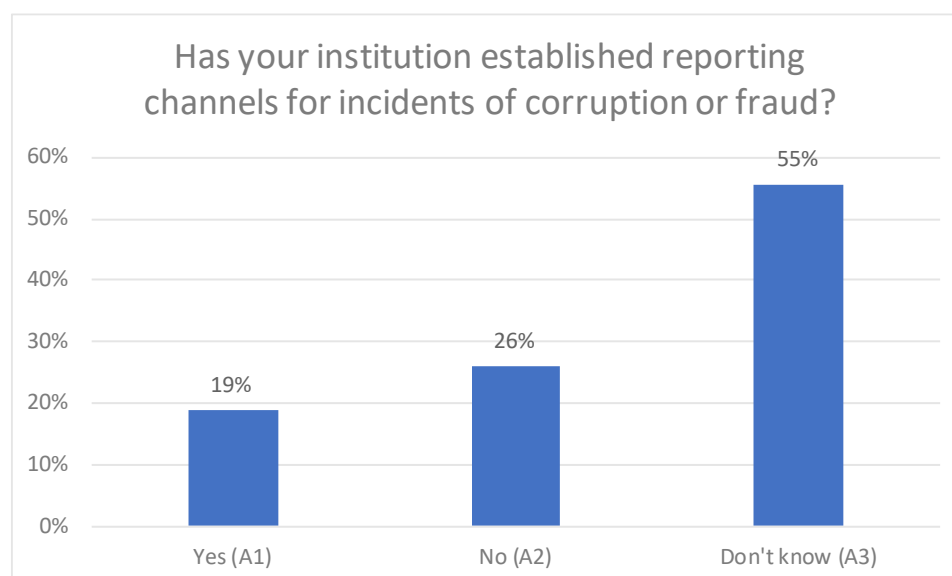
**Figure 3.1. Public officials' awareness of the legal framework for the protection of persons reporting violations of EU law**



This shows that despite the transposition of the EU Directive, more efforts are required to raise awareness on the protections afforded to officials if they were to report violations of EU law. A good example of raising awareness on Whistleblower protection in the public sector can be drawn from the UK Civil Service Commission, which promotes the inclusion of a statement in staff manuals that reassures employees that disclosures are protected (OECD, 2016<sup>[2]</sup>). A good practice that comes from US is the establishment of a Whistleblower Protection Ombudsman for each agency (US Whistleblower Protection Enhancement Act - WEPA). In case of Greece, this competence is exercised by the integrity advisors.

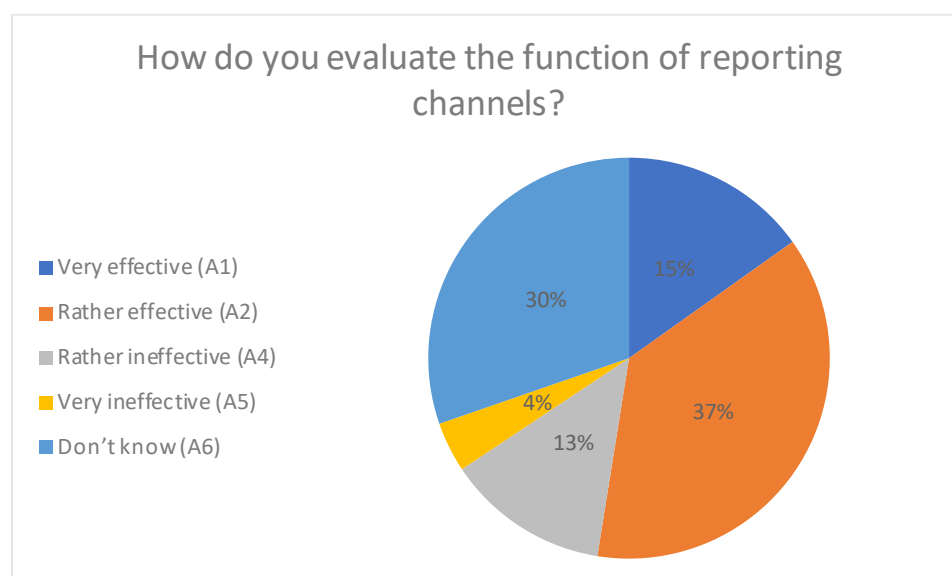
Fewer than one in five (19%) respondents said their institution has established a reporting channel while around one in four respondents (26%) said their institution has not done so. A notable percentage (55%) reported uncertainty on whether this was the case or not (Figure 3.2). The low number of respondents who said that their institution has established a reporting channel, indicates that further efforts are required to better inform officials of their existence.

**Figure 3.2. Public officials' awareness about the establishment of internal reporting channels**



As for the function of reporting channels (Figure 3.3), they were evaluated as rather effective or very effective by 52% of respondents and as rather ineffective or very ineffective by 17%<sup>4</sup>. This is an encouraging sign that despite low awareness of reporting channels, most of those who know or use them evaluate them positively.

**Figure 3.3. Function of internal reporting channels**

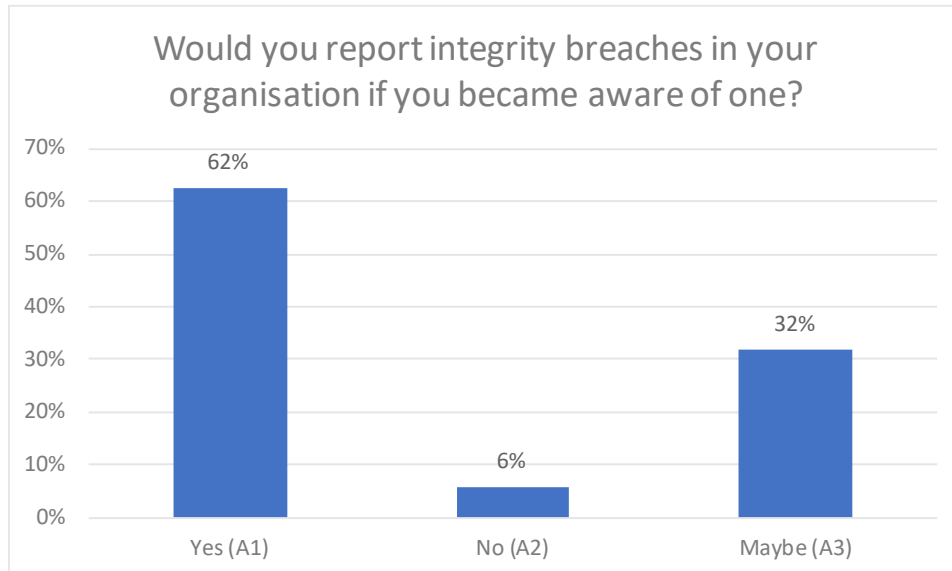


When it comes to willingness to report (Figure 3.4), a large majority of respondents (62%) said they would report incidents of corruption and fraud in their organizations if they became aware of one, indicating a positive disposition towards whistleblowing and accountability. Only 6% stated they would not report integrity breaches and 32% responded with maybe. Looking ahead to repeating the survey in the future,

<sup>4</sup> Sum of percentages for combined answer options.

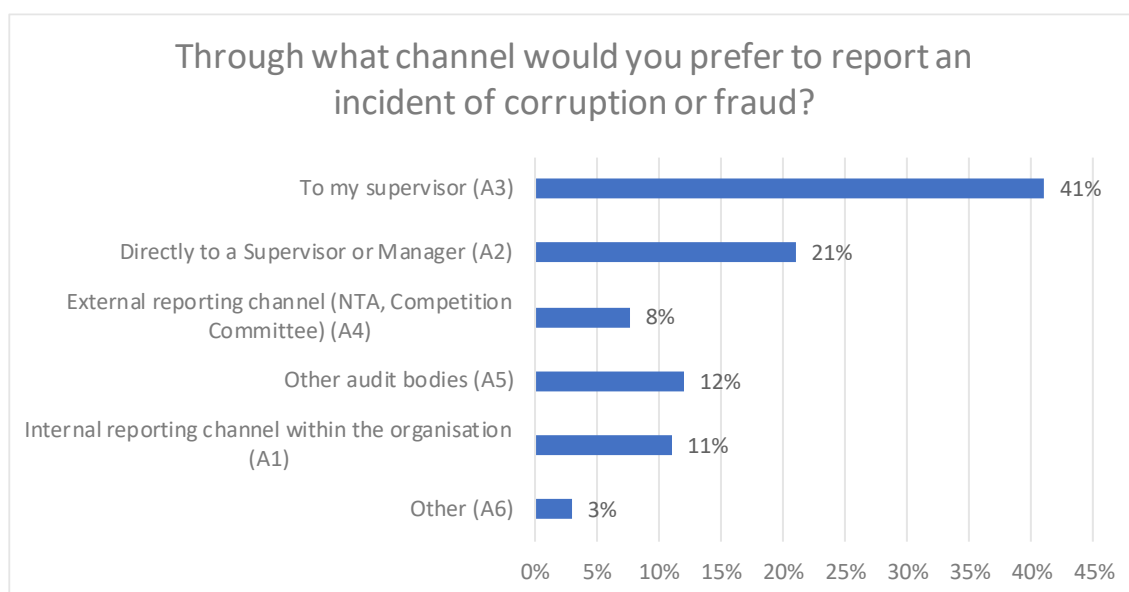
the NTA could consider including an experience-based question on whether respondents have actually reported an incident of fraud or corruption.

**Figure 3.4. Willingness to report incidents of corruption and fraud in the organisation**



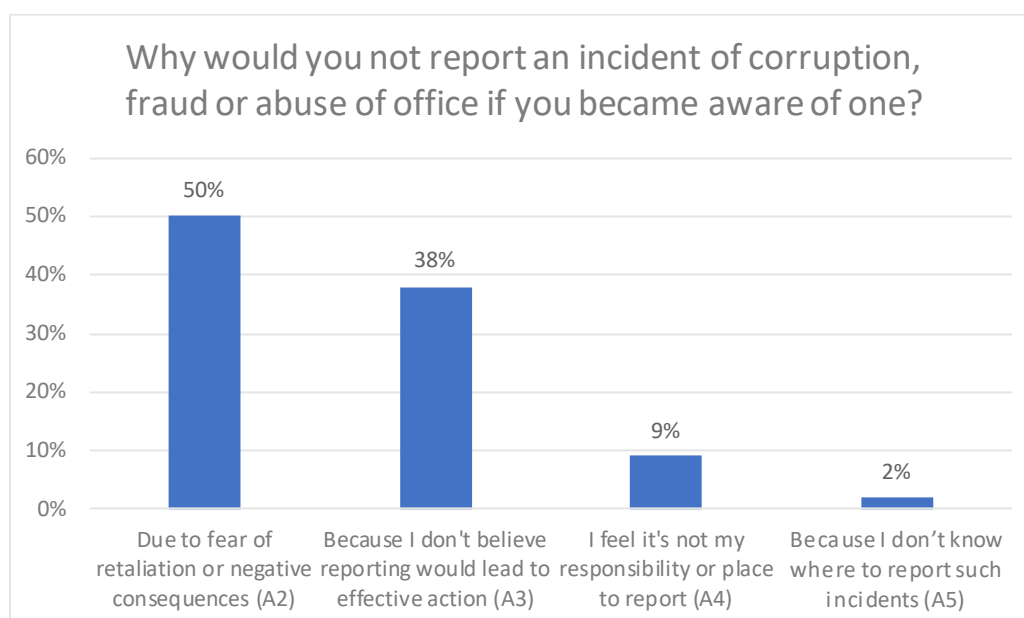
The preferred channels for reporting incidents of corruption or fraud varied among respondents, with the direct supervisor or manager being the most selected options with a combined 62%. This indicates that public officials feel comfortable raising these concerns with their managers. At first glance, trust in the supervisor is positive because it indicates that the supervisor can inspire such an emotion. Nevertheless, the need for qualified officials who are bound by the duty of impartiality and confidentiality is indisputable given that supervisors can also be involved in such incidents. Other options including internal reporting channels, external reporting channels and other audit bodies all had around 12% of respondents each (Figure 3.5). This suggests that internal and external reporting channels need to be further promoted as an alternative to turning to supervisors or managers.

Figure 3.5. Public officials' preference of reporting channels



Among the 6% of the respondents who stated that they would not report corruption and fraud incidents, 50% cited fear of retaliation as the reason for their hesitation, while 38% said they do not believe reporting would lead to effective action (Figure 3.6). A further 9% responded that they do not feel it is their responsibility and 2% said that they don't know where to report such incidents.

Figure 3.6. Main reasons for not reporting corruption and fraud incidents



These results indicate that more needs to be done to strengthen the protection of those officials who come forward to report corruption and fraud incidents. Whistleblower protection should include measures against discriminatory or retaliatory personnel action as well as against other behaviours such as exclusion, hostility and any form of harassment from managers and co-workers (OECD, 2020<sup>[3]</sup>). It should be underlined that to this direction, the scope of L. 4990/2022 has been extended by L. 5095/2024 in order the persons who report domestic law violations relating to bribery and influence trading offences to be

protected too. In Greece, the main problem with protection measures against retaliation is that the measures shall apply in court.

In addition to strengthening the legal framework, promoting an open and safe culture may be required to ensure that no one fears retaliation. Furthermore, given the large number of officials who do not think that reporting would lead to effective action, it is critical to strengthen the enforcement of disciplinary and other measures against abuse of public office.

## Conflicts of interest

***A majority of surveyed public officials indicated a lack of awareness regarding conflict-of-interest regulations, which combined with the large number of respondents who claimed to have not faced a conflict-of-interest situation may indicate a lack of knowledge and ability to identify conflict-of-interest situations***

Regulating, managing, and preventing conflicts of interest in the public administration is another key pillar of a national integrity framework. This policy area is covered by UNCAC as well as the OECD Recommendation on Public Integrity and the OECD Recommendation on Guidelines for Managing Conflicts of Interest among other major legal instruments and standards against corruption (UNODC, 2004<sup>[4]</sup>) (OECD, 2017<sup>[1]</sup>) (OECD, 2003<sup>[5]</sup>). Conflicts of interest are regulated by law in Greece, however a recent OECD mapping and gap analysis showed room for improvement in updating the legal basis as well as the enforcement and compliance <sup>5</sup>.

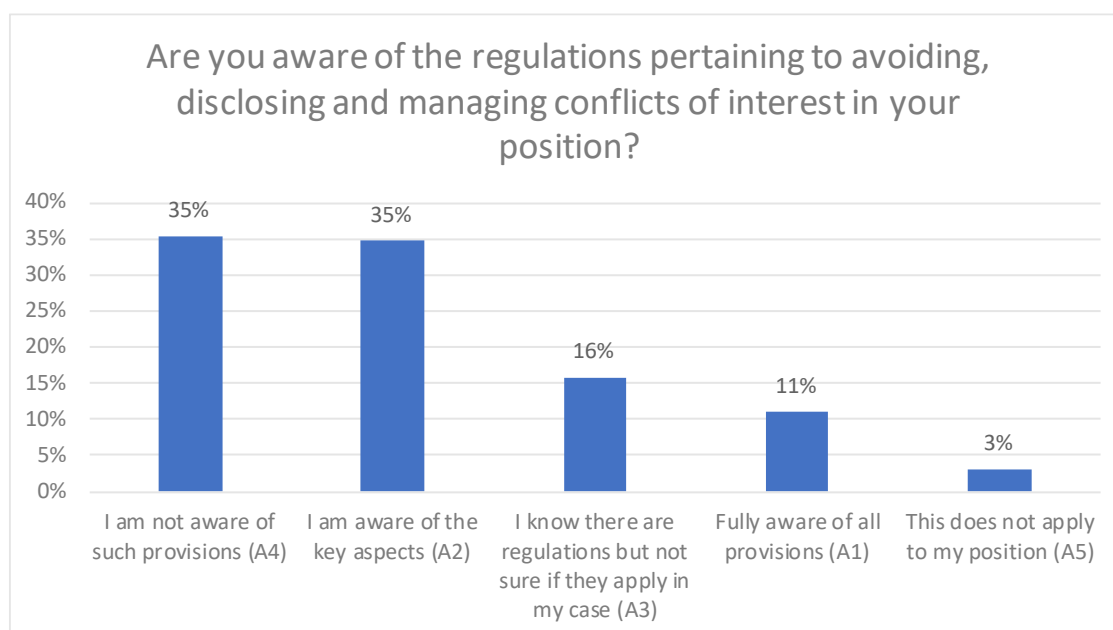
When asked about regulations pertaining to avoiding, disclosing, and managing conflicts of interest in their positions, 35% of respondents indicated a lack of awareness regarding regulations and a further 16% said they are not sure if regulations apply in their case (Figure 3.7). The lack of an all-encompassing definition of conflict of interest combined with the fragmentation of the legal framework<sup>6</sup>, both issues identified in the mapping and gap analysis conducted by OECD, may contribute to this lack of awareness from public officials.

An important issue that should also be highlighted is the need for practical training for public officials focusing in the features of each position and specific ethical dilemmas, as despite the fact that there are legal provisions, there is difficulty in recognizing conflict-of-interest situations in practice. To this end, the NTA in cooperation with the OECD- in the context of the project “Strengthening Integrity, Transparency and Anti-Corruption Framework”- developed an integrated web-based training tool to enhance public officials’ skills and critical thinking. The tool consists of 16 video webinars including theoretical presentations of the current national legislation but also case studies and practical examples of ethical dilemmas. Finally, it should be noted that Integrity Advisors have the potential to play an important role in coordinating, interpreting, and applying Greece’s integrity framework and help the public officials to better understand their obligations on integrity issues, as highlighted in the reports of Outputs 1 and 2 of this project.

<sup>5</sup> OECD, *Mapping and Gap Analysis of the Conflict of Interest System in Greece (Output 1)*

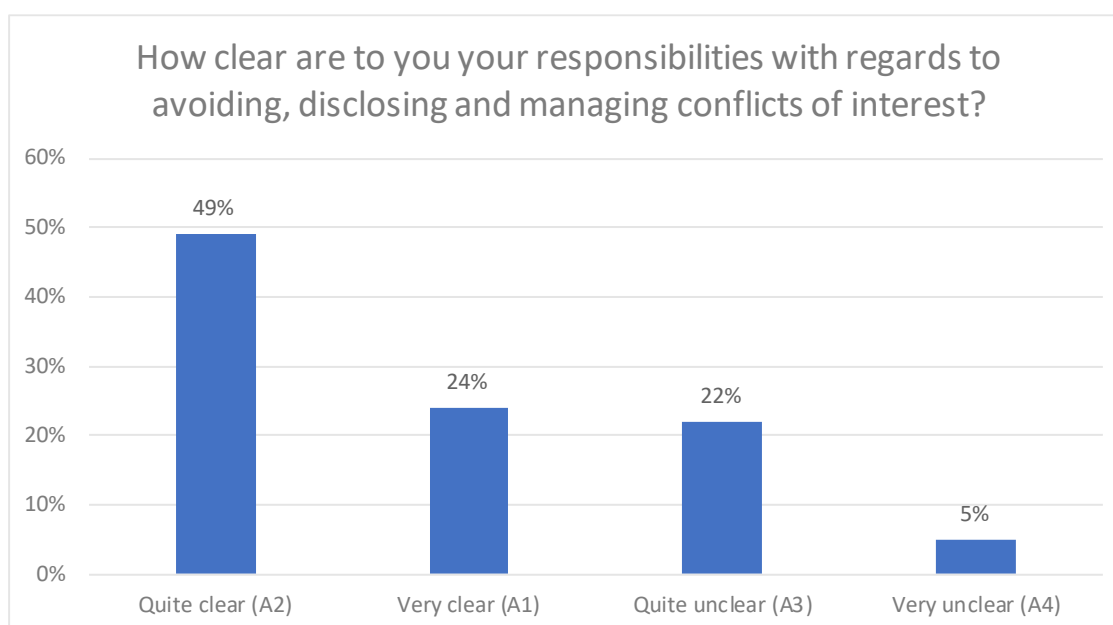
<sup>6</sup> OECD, *Mapping and Gap Analysis of the Conflict of Interest System in Greece (Output 1)*

**Figure 3.7. Public officials' awareness about conflict-of-interest regulations**



Among the officials who are aware of conflict-of-interest regulations, an overwhelming majority (73%) said their responsibilities with regards to avoiding, disclosing and managing conflicts of interests are quite clear or very clear, whereas only 27% said they are quite unclear or very unclear (Figure 3.8).

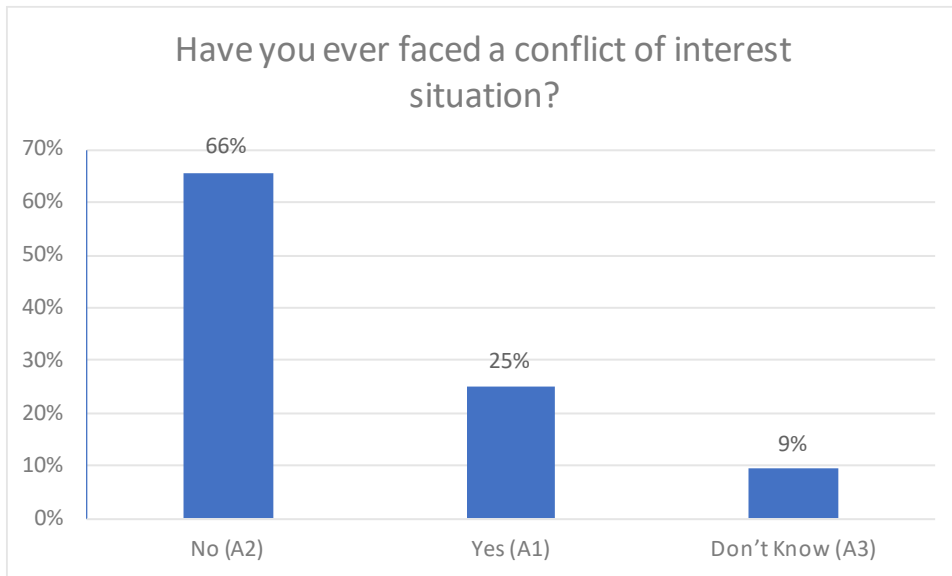
**Figure 3.8. Public officials' understanding of conflict-of-interest responsibilities**



When asked if they ever faced a conflict-of-interest situation, 66% of respondents said they had not done so and one in four (25%) respondents said they had, while 9% said they don't know (Figure 3.9). Combined with the 51% of surveyed public officials who are not aware of conflict of interest regulations or not sure whether the provisions apply in their case, the large number of respondents who said that they had not faced a conflict-of-interest situation may point to an inability to recognise such a situation. Among the officials who faced a conflict-of-interest situation, 38% said they disclosed it to their supervisor, 10% sought

advice from managers, 32% both disclosed it and sought relevant advice and 20% did not take any action (Figure 3.10). As regards the relatively high percentage of the respondents who answered that they would not take any action, this could be explained by the fact that except for the cases that interests are connected to financial benefits, it is difficult for the employees to assess whether they face a conflict-of-interest situation. Lack of experience or formalities in laws and regulations may explain this situation.

**Figure 3.9. Percentage of public officials who have faced a conflict-of-interest situation**



**Figure 3.10. Public officials' reaction when faced with a conflict of interest**



## Assets and interests declarations

***While a large group of surveyed public officials are aware about the provisions and obligations regarding asset and financial interest declarations and consider them effective, a significant percentage remains unsure about their effectiveness because many consider that assets controlled in practice by declarants are often not under their formal (legal) ownership***

Declarations of assets and financial interests are one of the key tools used to prevent, detect and counter conflicts of interest and illicit enrichment of public officials. The system of assets declarations was recently upgraded in Greece, and the present survey asked several questions to public officials on their awareness of the system and their evaluation of its effectiveness.

Respondents were asked whether they are aware of the provisions and obligations arising from the law on asset and financial interest declarations. 58% were either fully aware or aware of the key aspects<sup>7</sup>, 14% said they know there are regulations but are not sure if they apply in their case and a further 25% responded that they are not aware of such provisions (Figure 3.11).

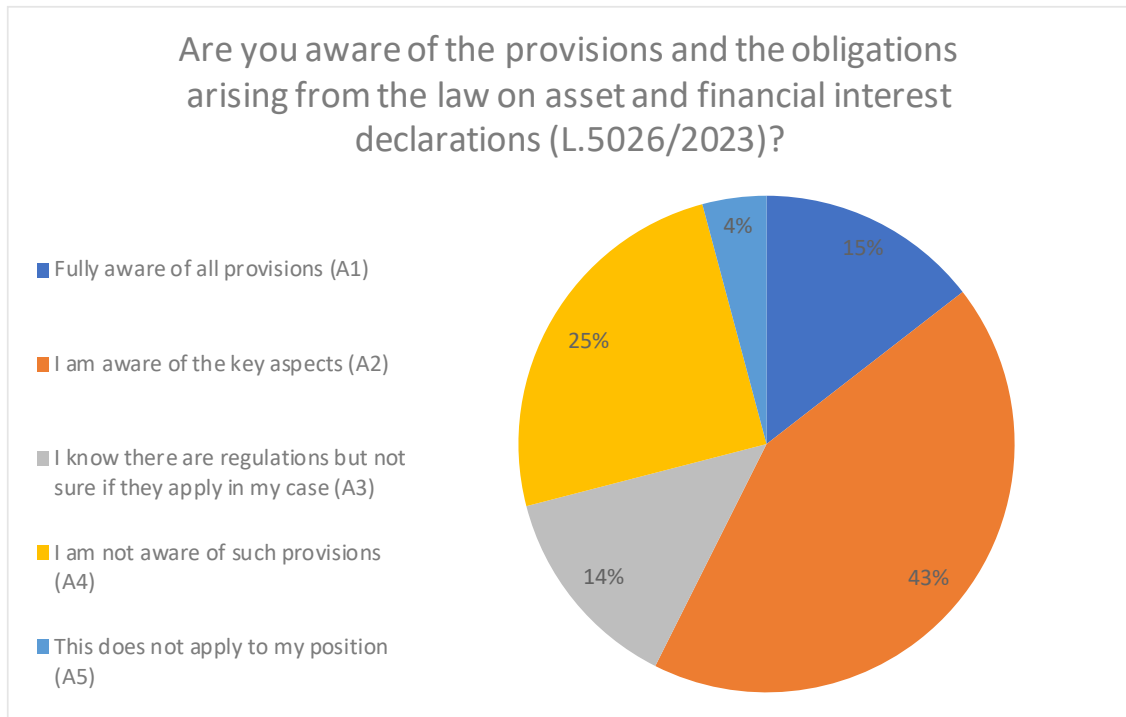
The high percentage of officials that are aware of the key aspects can be justified by the fact that the respective legislation is in force since 2003 as L. 5026/2023 updates the provisions of L. 3213/2003. While non-compliance entails severe penalties. On the other hand, the one in four respondents that are not aware of the relevant provisions can be justified by the fact that the question was about the provisions of L. 5026/2023 which is quite new and not the basic Law 3213/20023 on asset declarations. In addition, despite the fact that Law was voted in 2023, it is yet not implemented since there was a need for: a) Issuing excessive secondary legislation, b) Adaptation and compliance of the information system for the submission of asset declaration to the provisions of L. 5026/2023.

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<sup>7</sup> Combined 15% who responded with "Fully aware of all provisions" and 43% who said "I am aware of the key aspects."



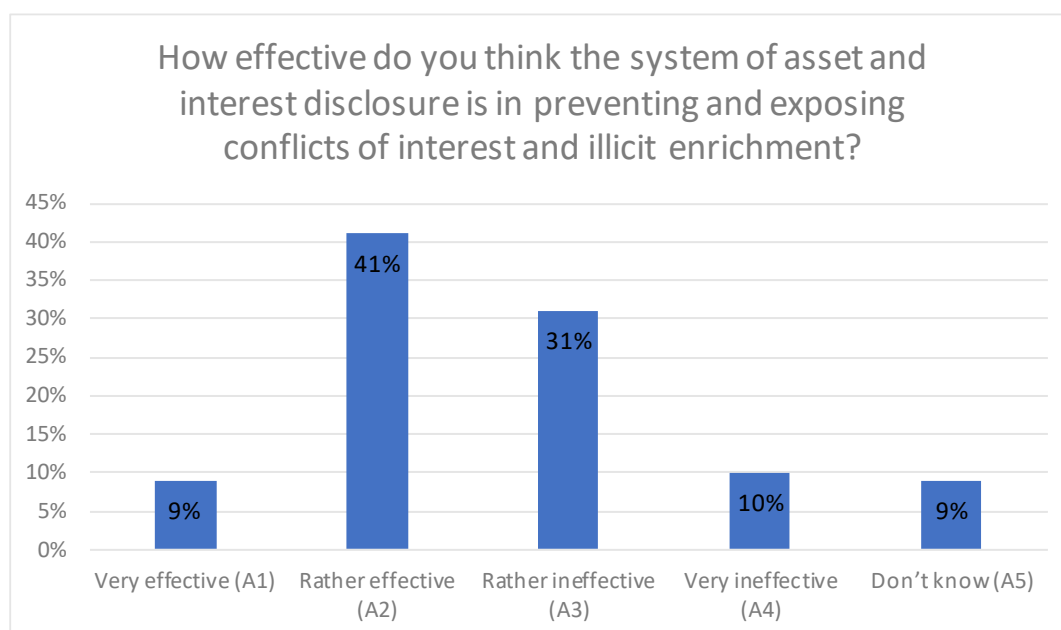
**Figure 3.11. Public officials' awareness about the legal framework on asset and financial interest declarations**



Among the officials who were aware of the provisions on asset and financial interest declarations<sup>8</sup>, the largest group, 50% said that they are very effective or rather effective, 41% said that they are very ineffective or rather ineffective and 9% said they don't know (Figure 3.12). This indicates that despite recent upgrades, further efforts are required to ensure that the system is effective across the board.

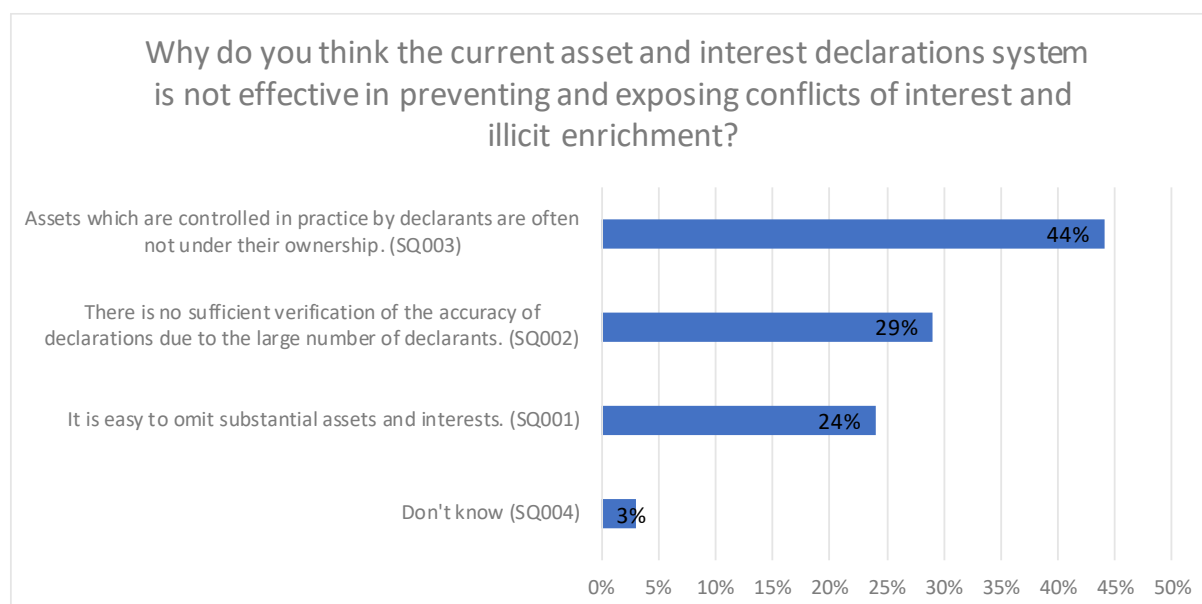
<sup>8</sup> Combined respondents who said "Fully aware of all provisions", "I am aware of the key aspects" and "I know there are regulations but not sure if they apply in my case."

**Figure 3.12. Effectiveness of the system of asset and interest declarations in Greece**



Among the officials who said that the system of asset and interest disclosure is not effective, almost 44% cited as a key reason the fact that assets that are controlled in practice by declarants are often not under their formal (legal) ownership, 24% said that it is easy to omit substantial assets and interests and 29% said that there is no sufficient verification of the declarations due to the large number of declarants. (Figure 3.13)<sup>9</sup>.

**Figure 3.13. Main reasons for the ineffectiveness of the current asset and interest declarations system**



<sup>9</sup> Percentages add up to more than 100% as multiple answer options were possible.

According to the results, a possible next step to strengthen the system would be to upgrade the regime and register of Politically Exposed Persons and Beneficial Ownership transparency, to ensure that declarant's effective control of assets is not hidden through their associates' legal ownership or offshore vehicles. Strengthening the mandate and resources for verification and increased cooperation between agencies domestically and abroad would also contribute to a more effective system. On the latter, the model of the French High Authority for Transparency in Public Life (HATVP), with a mandate to investigate and cooperation modalities with other relevant domestic institutions, can serve as a guide for an institutional set-up designed to proactively detect substantial omissions in declarations and empowered to sanction non-compliance (JORF, 2013<sup>[6]</sup>).

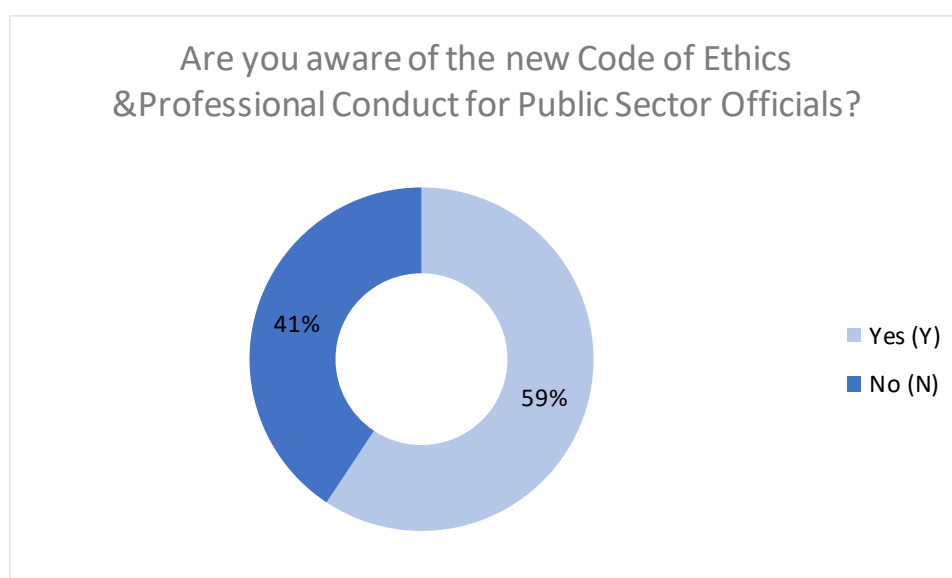
## Codes of Conduct and Ethics for Public Officials

***The majority of respondents are aware of the Code of Ethics & Professional Conduct for Public Sector Officials for public officials and consider it effective, while a significant percentage remains sceptical about its effectiveness due to lack of enforcement and many public officials do not know if a Code of Conduct/Ethics is adopted at the organisational level***

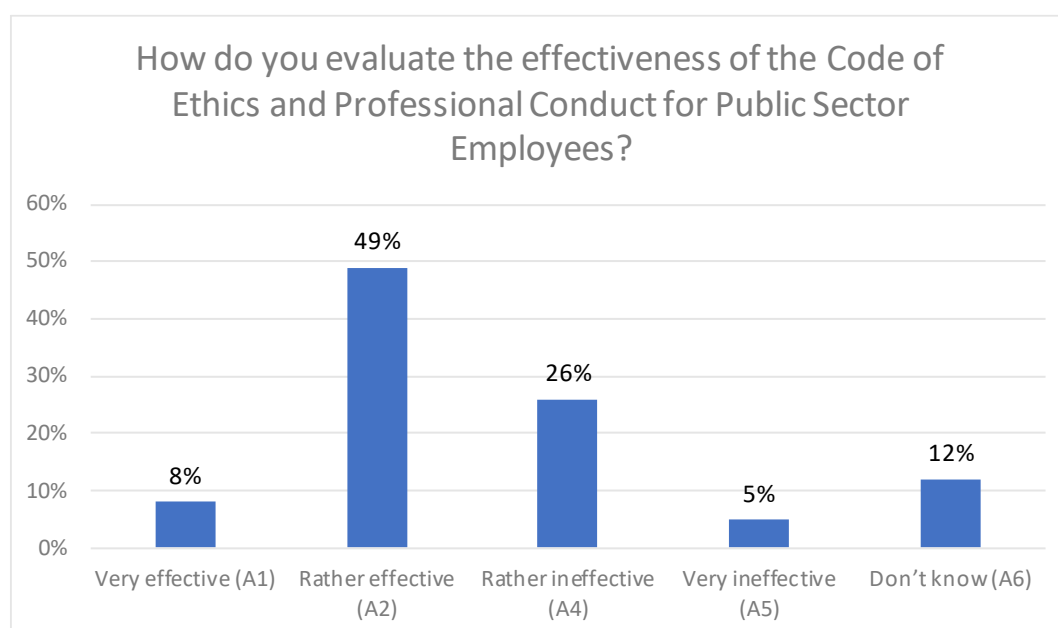
Formulating and enforcing high standards of conduct for public officials is another key aspect of a robust public integrity system. Article 8 of the UNCAC mandates state parties to promote integrity through codes of conduct, reporting channels for public officials and disciplinary measures for violations of the codes (UNODC, 2004<sup>[4]</sup>). Furthermore, the OECD recommendation on Public Integrity calls upon its adherents to set high standards of conduct for public officials (OECD, 2017<sup>[11]</sup>).

As a key component of the Greek National Integrity System, public officials participating in this survey were asked about their awareness as well as their views about the effectiveness of the Code of Ethics & Professional Conduct for Public Sector Officials. While most respondents (59%) indicated awareness, a significant percentage (41%) reported a lack of knowledge of the new code (Figure 3.14). Among the officials who indicated awareness of the new code a clear majority (57%) evaluate it as either very or rather effective, whereas 31% said it is very or rather ineffective. 12% said they don't know

**Figure 3.14. Public officials' awareness of the new Code of Ethics & Professional Conduct for Public Sector Officials**

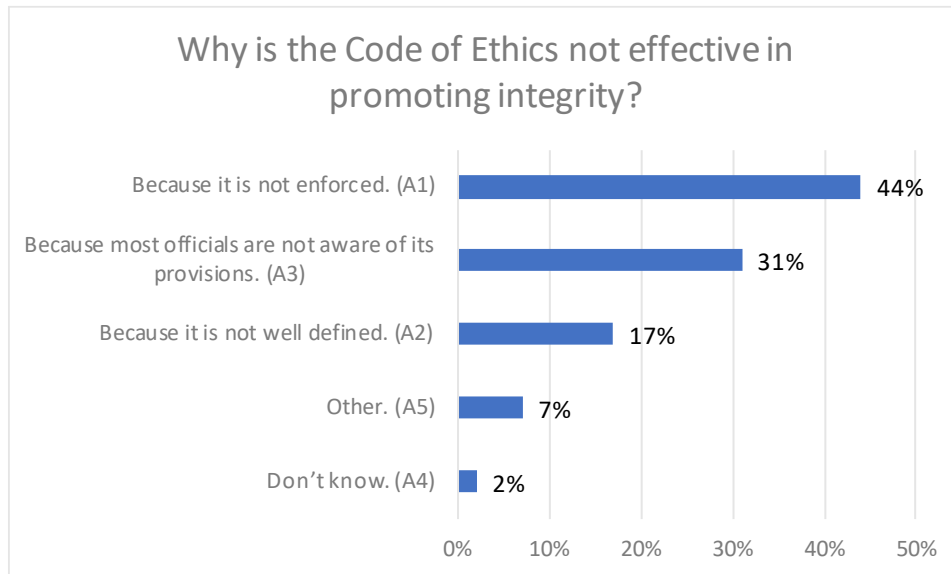


**Figure 3.15. Effectiveness of the Code of Ethics and Professional Conduct for Public Sector Officials**



Officials who said that Code of is not effective were asked for their views on the reasons for that. The most frequent answer (44%) was that code is not enforced, followed by 31% of respondents who believe that it is because most officials are not aware of its provisions, while a further 17% stated that the code's implementation framework is not well defined (Figure 3.16).

**Figure 3.16. Main reasons for the ineffectiveness of the Code of Ethics & Professional Conduct for Public Officials in promoting integrity**



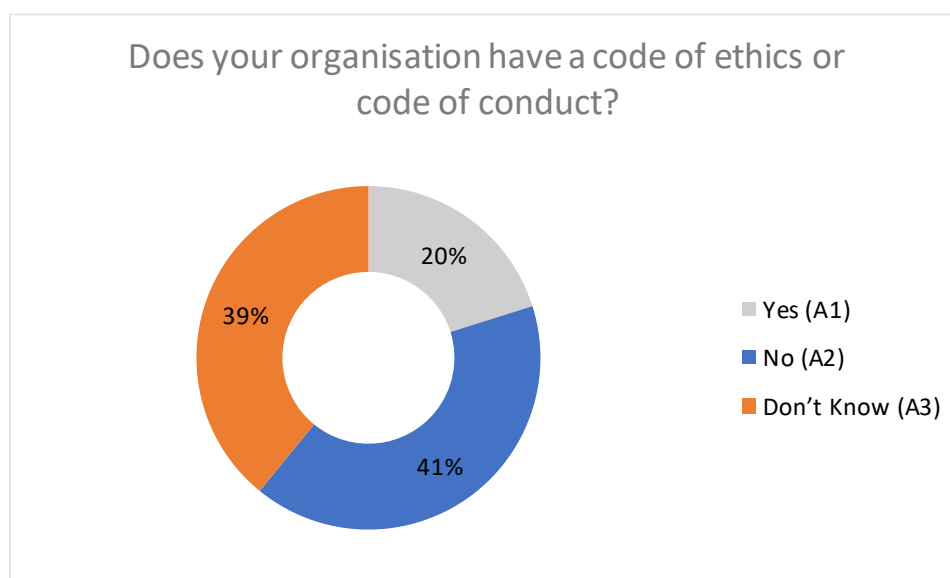
These three top responses highlight some of the key features of a well-functioning mechanism of codes of conduct, which includes proper enforcement with credible and proportionate sanctions, clear definitions of responsibilities and systematic awareness raising and training on the provisions of the codes. The OECD Public Integrity Handbook emphasises the importance of credible enforcement and sanctions, including warnings and reprimands; monetary disadvantages (e.g. fines, salary penalties); impact on current or future career; ban from public office, or in some cases even dismissal from office (OECD, 2020<sup>[3]</sup>).

The high percentage (44%) of respondents having the opinion that the code is ineffective due to the absence of enforcement measure, reflects a rather a strong enforcement culture and, conversely, the limited familiarity with soft law regulations. Of course, it should be made clear that despite the fact that non-compliance with the Code does not entail sanctions, the principles included therein are basic principles of the Civil Servants Code and their violations constitute disciplinary offenses and are punished. One significant milestone in the effort to strengthen compliance was the creation of the platform “*e-peitharxika*” which was launched in January 2024 and allows the real-time monitoring the progress of disciplinary procedures of all the public entities.

When it comes to addressing the concerns of those who said that the code’s implementation framework is not well- defined , any future re-drafting may benefit from consulting international models such as the International Code of Conduct for Public Officials (UN General Assembly, 1997<sup>[7]</sup>) or the Council of Europe Model Code of Conduct (Council of Europe, 2000<sup>[8]</sup>), as was the case at the time of the initial elaboration.

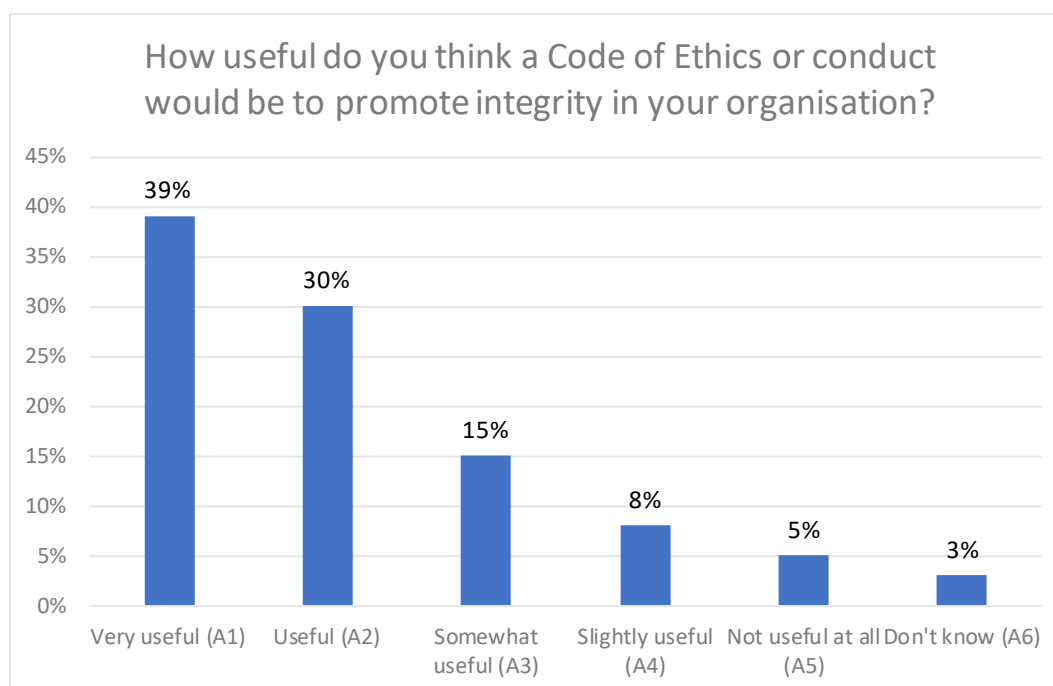
When asked whether their organisation has a code of ethics or code of conduct, a notable percentage (39%) said they do not know, while 41% said no and only one in five said yes (20%) (Figure 3.17). This shows that either the coverage of such codes should be expanded to more institutions across the public administration, or that more awareness raising and training is required to ensure that officials know the integrity rules governing their functions. To address low awareness of codes, the OECD Public Integrity Handbook recommends that officials, especially newcomers, should have personal copies of the codes of conduct or easy access to it (OECD, 2020<sup>[3]</sup>). It further notes that a dedicated intranet page can serve as a central repository for related information, complemented by other channels like memos, brochures, and presentations (OECD, 2020<sup>[3]</sup>).

**Figure 3.17. Public organisations with a Code of Ethics/Code of Conduct in place**



Those officials who said that their organisation does not have a code of ethics or code of conduct were asked how useful they think such a code would be to promote integrity in their organisation. An overwhelming majority, 69% said they would find it useful or very useful, 23% said they would find it somewhat or slightly useful, while only 5% said they would not find it useful at all (Figure 3.18). This large support for the introduction of codes of conduct shows that Greek public officials would welcome more guidance on integrity standards, which ought to make the process of rolling them out more efficient.

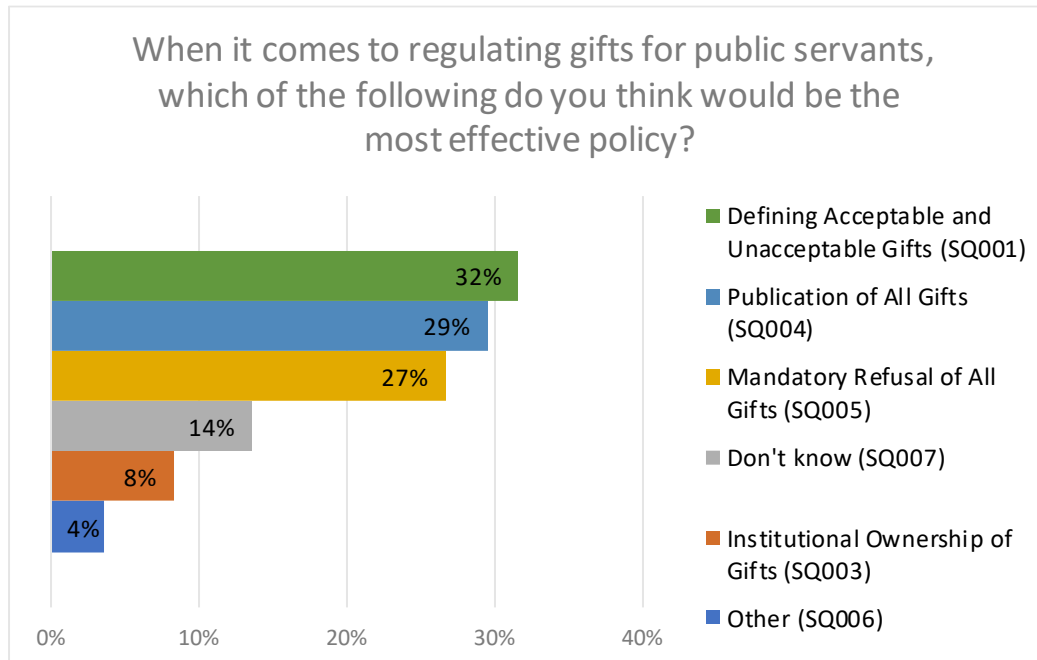
**Figure 3.18. Usefulness of Code of Ethics or Conduct in public organisations**



Finally, when it came to preferred policies for regulating gifts, nearly a third (32%) of respondents opted for defining acceptable and unacceptable gifts, 29% chose mandatory publication for all gifts and 27%

voted for mandatory refusal of all gifts (Figure 3.19). Only 8% opted for institutional ownership of gifts. Defining acceptable gifts and mandatory declaration for all gifts are not only the most selected options from respondents but also complementary policies that can be implemented jointly. .

**Figure 3.19. Most effective gift policies**



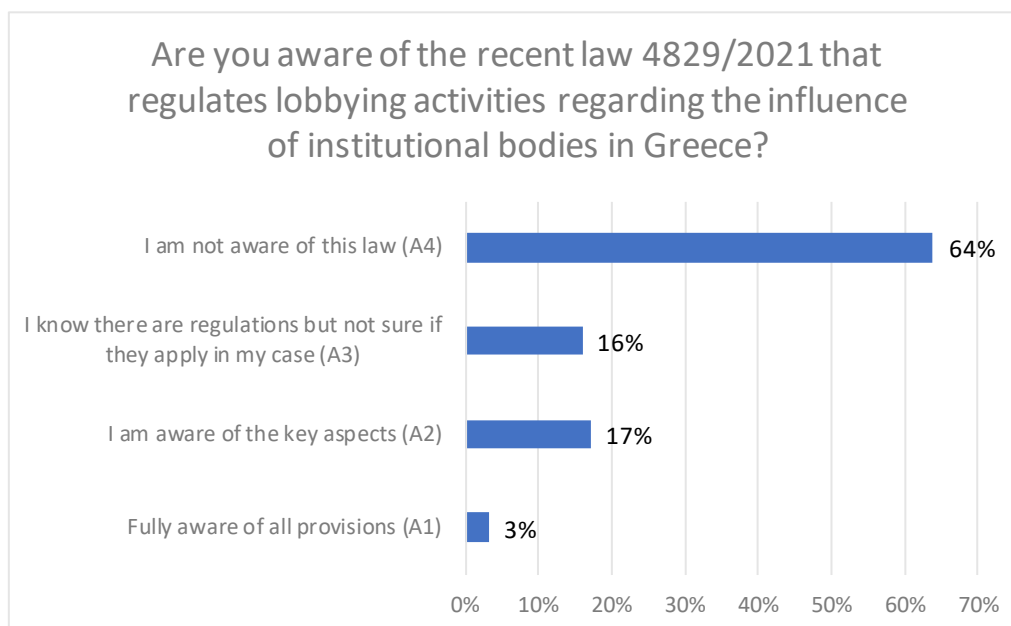
## Lobbying activities

### ***An overwhelming majority of surveyed public officials are not aware of the Law on Lobbying (Law 4829/2021) and do not report direct experiences with lobbyists***

Greece passed the law on “Strengthening Transparency and Accountability of State Institutional Bodies” in 2021, which was the first legislation to regulate lobbying activities between state institutions and lobbyists. The Transparency Register, also provided by Law, was launched in December 2022. Therefore, lobbying remains a new policy area in the Greek public integrity system. The OECD Public Integrity Recommendation encourages transparency and stakeholder engagement while averting the capture of public policies by narrow interest groups as well as and instilling transparency in lobbying activities (OECD, 2017<sup>[11]</sup>).

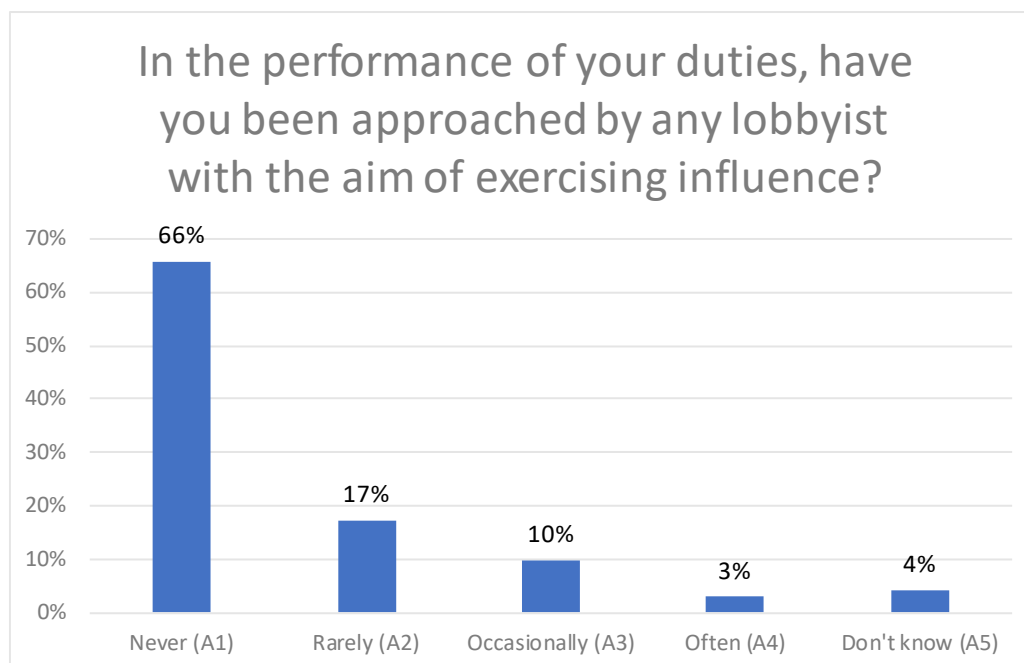
When asked about the law 4829/2021 that regulates lobbying activities, an overwhelming majority (64%) of respondents reported not being aware of it and a further 16% of respondents said they know there are regulations but are not sure if they apply in their case. Only 20% said that they are either fully aware of all provisions or aware of the key aspects (Figure 3.20). This low percentage can be explained due to the recent adoption of law 4829/2021 and its narrow scope of application to specific institutional bodies. In so far, the 3% of respondents who answered that they are fully aware of the law correspond to the actual percentage of public officials falling within the scope of law 4829/2021 as institutional bodies.

**Figure 3.20. Awareness of lobbying regulations**



Similarly, on the question of direct experience with lobbyists, 66% of respondents said that it never occurred to them that a lobbyist attempted to influence their decision. 17% of respondents reported that this has happened only rarely to them, 10% said it happened occasionally and 3% reported having often had this experience (Figure 3.21). The large percentage of those who did not report direct experience (66%) may be a result of the fact that this survey was administered among all levels of public officials, most of them do not constitute institutional bodies according to the provisions of L. 4829/2021.

**Figure 3.21. Public officials' direct experience with lobbyists**





More proactive training and information dissemination on the provisions regulating lobbying activities are required to ensure that all officials are aware of their responsibilities when approached by an interest representative. Article 17 of the OECD 2010 Principles on Lobbying states that “Mechanisms [for effective implementation] should raise awareness of expected rules and standards; enhance skills and understanding of how to apply them...” (OECD, 2010<sup>[9]</sup>). Tools similar to those recommended above to raise awareness of codes of conduct or Whistleblower protection, such as inclusion of these obligations in staff manuals, training curricula, circulars and intranet repositories, can contribute to better diffusion of rules and norms.

### Integrity advisors and internal audit

***There is a notable lack of clarity among public officials regarding the role of Integrity Advisors which combined with the high number of respondents citing fear of retaliation to report corruption cases indicates a need for increased communication as to how Integrity Advisors can function as a safe channel for reporting. The lack of awareness of public officials about the existence of Internal Audit Units in their organisations shows that further efforts are required to increase visibility about these units***

While the role of Integrity Advisors is not a common feature of most anticorruption and integrity frameworks, its establishment in the Greek public administration is a positive step in the direction of providing alternative channels for official who wish to report instances of corruption or abuse or who want to consult a professional within their organisation on integrity concerns.

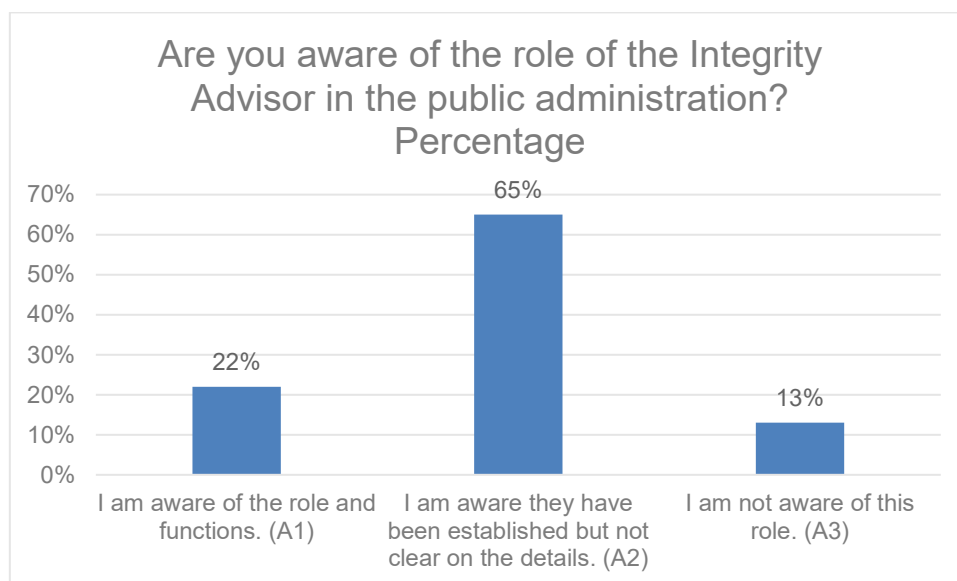
When asked about the recent law L 4795/2021 which introduces the role of Integrity Advisors in the Greek public administration, one in two respondents (51%) said they are not aware of this law. Just over one in four (26%) respondents said they are fully aware of all provisions or aware of key aspects of the law, and a further 23% said they know the regulation but are not sure what the provisions are (Figure 3.22).

**Figure 3.22. Public officials’ awareness of Law 4795/2021 introducing Integrity Advisors**



Among the 49% of officials who were aware of the law<sup>10</sup>, 65% said that they are aware that Integrity Advisors have been established but they are not clear on the details, while 22% said that they are aware of the role and functions. Finally, 13% said that they are not aware of this role (Figure 3.23). This notable lack of clarity among public officials on the role of Integrity Advisors raises the need for increased communication through circulars or training workshops, to ensure that more officials can utilise the support and reporting channels provided by integrity advisors.

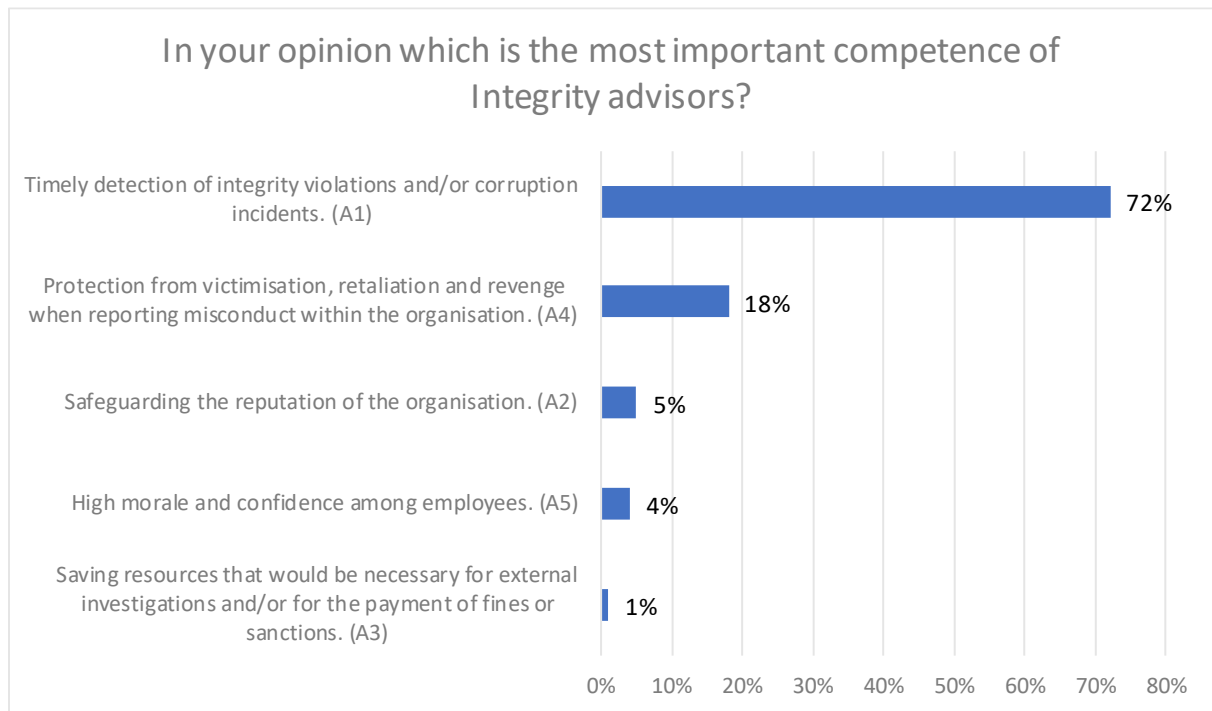
**Figure 3.23. Public officials' awareness of the role of Integrity Advisors**



As shown in Figure 3.24, among the officials who are aware of the role or that at least know that Integrity Advisors have been established (87% of respondents), 72% think that their most important competence is the timely detection of integrity violations or corruption incidents. The second largest group of respondents, albeit far below the first with only 18%, said the key competence is the protection from victimisation, retaliation and revenge when reporting misconduct within the organisation. Safeguarding the reputation of the organisation and high morale and confidence among employees was only selected by 5% and 4% respectively. Finally, saving resources that would be necessary for external investigations and/or for the payment of fines or sanctions was selected by a small minority of 1% of the respondents.

<sup>10</sup>The percentage of 49% is the sum of the percentages of respondents who, in the previous question on whether they are aware of L. 4795/2021 (Figure 3.22), answered that: a) Are fully aware of all provisions- 6% (A1), b) are aware of key provisions – 20% (A2), c) know that there are regulations but no sure what the provisions are- 23% (A3)

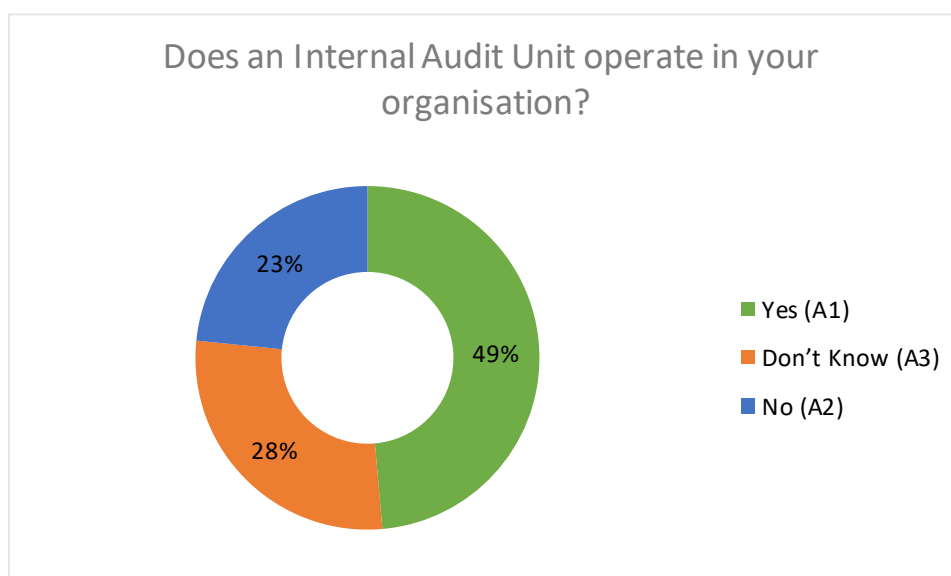
**Figure 3.24. Most important competences of Integrity Advisors**



Given that 50% of respondents who said they would not report a case of corruption cited fear of retaliation as the main reason (Figure 3.6), the role of Integrity Advisors as a safe channel for reporting as well as counselling on integrity issues should be further emphasised in internal communications and integrity training materials.

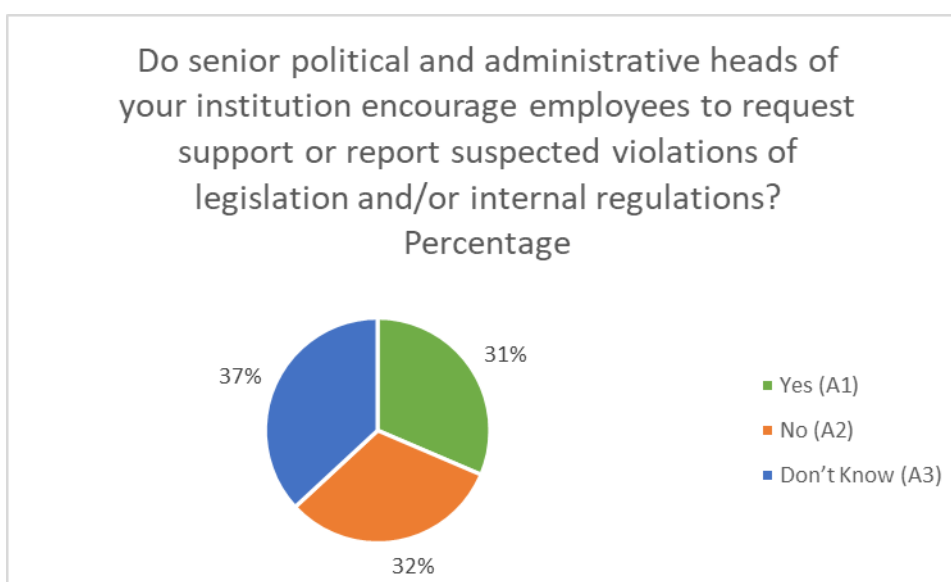
Officials were also asked if there is an Internal Audit Unit in their organisation (Figure 3.25). Almost one in two (49%) of respondents said that there is an Internal Audit Unit in their organisation, while 23% said there isn't one and 28% responded with "don't know." While some bodies are exempt from internal audits or may entrust the audit to a natural or legal person under an independent service contract, the large number of respondents who either don't know or said that such a unit does not exist, indicates that additional efforts are required to establish such units or to improve internal communications and visibility of their activities.

**Figure 3.25. Internal Audit Units in public organisations**



When it comes to encouragement of public officials from senior political and administrative heads to request support or report suspected violations, results were mixed (Figure 3.26). Only 31% said that senior officials encourage employees, 32% said they do not and 37% said they don't know. This indicates potential variation in leadership approaches towards fostering a proactive culture of accountability, and points to the need for increased targeted training on integrity issues for leaders in public administration.

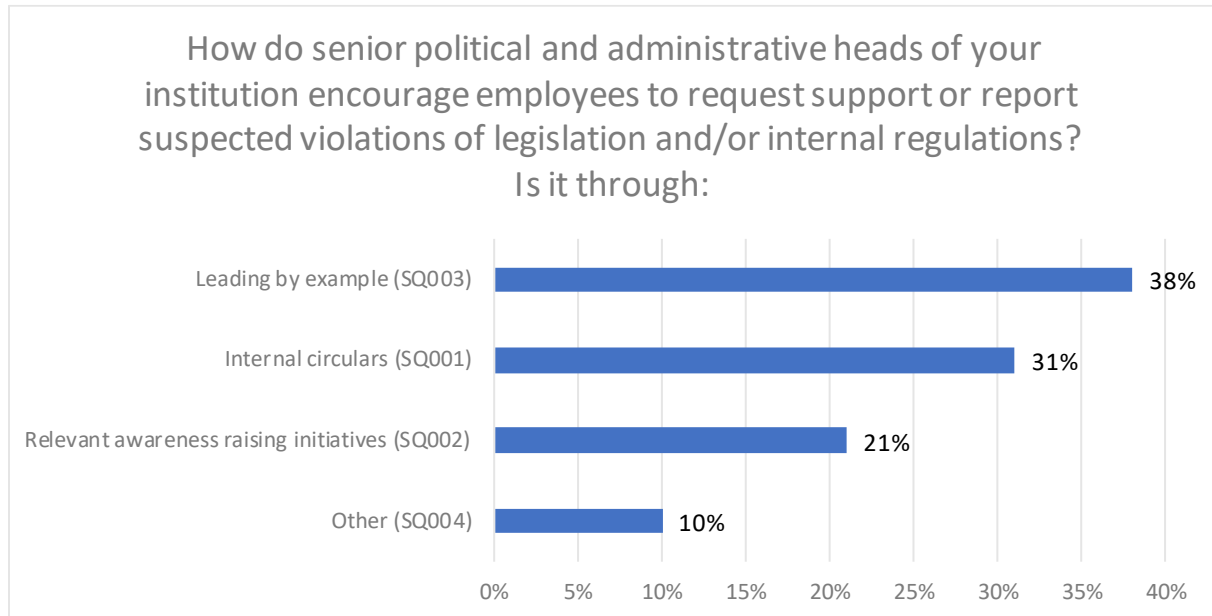
**Figure 3.26. Encouragement of public officials from heads of institutions to request support or report suspected violations of legislation and/or internal regulations**



The 31% of respondents who believe that senior leadership encourage employees to request support or report suspected violations, cited varied methods of encouragement (Figure 3.27). 38% cited leading by example, 31% mentioned internal circulars, while approximately one in five respondents (21%) said it was done through relevant awareness raising initiatives. Targeted training programmes for senior public administration leaders can consider these forms of encouragement among others covered in the curricula

and guidelines. Including integrity leadership in the recruitment criteria and profile of public managers as well as providing them with organisational support can be another effective policy to ensure consistent approaches from the top (OECD, 2020<sup>[3]</sup>).

**Figure 3.27. Methods of encouragement to request support or report suspected violations of legislation and/or internal regulations**



## 4 Key conclusions

This survey has highlighted that the current National Integrity System has introduced several effective measures to strengthen control of corruption in Greece and that public officials are positively predisposed to the reforms introduced. A majority of officials who know about reporting channels and Code of Ethics & Professional Conduct for Public Sector Officials codes of conduct, evaluated these two as effective or very effective. Furthermore, a majority of officials showed willingness to report integrity breaches if they became aware of one (62%), which indicates signs of a culture of openness

Despite many legislative and policy improvements as part of the National Integrity System reform, the survey shows limited awareness especially of regulations on lobbying, integrity advisors, and codes of conduct. The NTA has already developed tools and information systems to support the regulatory interventions mentioned, however a more targeted as well as systemic approach may be required to achieve higher awareness (NTA, 2023<sup>[10]</sup>). Despite an upgrade of asset declarations system, there is still work to be done until a majority of respondents see them as effective. According to the results, a possible next step to strengthen the system would be to further ensure that also assets over which the declarants do not have formal (legal) ownership (e.g. property titles, deposit accounts) are also controlled and strengthen the mandate and resources for verification. In fact, Greece has taken steps towards addressing those issues. as. L 5026/2023 provides the establishment of the Audit Committee, as single independent body responsible for auditing asset declarations while introduces provisions for the enhancement of the system's effectiveness through the full digitalization of the submission procedure of status and financial interests and related information the establishment of specific objective and measurable criteria for the selection of the declarations to be audited. Despite the efforts, there are more to be done for the rationalization of the system, mainly by narrowing down the scope of Law and further upgrading the regime of Politically Exposed Persons. In any case, it should be noted that, despite the undoubtedly large number of declarants, in 2023 around 6%<sup>11</sup> of all declarations were examined, a percentage which is very close to the agreed target set in cooperation with the European Commission while the declarations of Politically Exposed Persons are examined in their entirety.

Finally, many respondents still believe that enforcement of existing regulations and the application of disciplinary measures is lagging. This emphasises the importance of strengthening the mandate and resources of bodies that are in charge of detecting and sanctioning corrupt acts. Without appropriate sanctions and enforcement, many of the preventive policies, including codes of conduct, reporting channels, and conflicts of interest management may be less effective in promoting integrity.

Progress has been made but much remains to be done. It cannot be disputed that the National Integrity System is a perfect example of a paradigm shift, as it consists the first national intervention aspired to introduce an integrated horizontal public administration reform. And this is very important, as, traditionally, horizontal policies are underestimated compared to the sectoral ones. On the other hand, the common theme across most policy areas surveyed is the lack of sufficient enforcement mechanisms and tools and the need for more awareness among officials. According to the NTA officials, the greatest challenge is to strike the right balance between introduction of new regulations and ensuring their compliance. Additionally, there is a need for the replacement of the enforcement culture by a culture of voluntary

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<sup>11</sup> 16.818 out of 290.586 declarations.

integrity, and especially in an era of a great reform fatigue which does not allow public officials to keep pace with the excessive introduction of new regulations. Therefore, the Greek Government focused on fostering an integrity culture and have opted for not very ambitious regulations, aiming, initially, at the familiarization with new standards with a view to gradually deepening the framework, by adopting enforcement and compliance mechanisms, where appropriate.

## Annex A. Demographic Summary

**Table A A.1. Please select the relevant level for the institution you work in:**

Answer	Count	Percentage
Central Government <sup>12</sup>	1803	58.27%
Local Administration <sup>13</sup>	899	29.06%
Social Security <sup>14</sup>	145	4.69%
Other (A4)	239	7.72%
I don't know (A5)	8	0.26%

**Table A A.2. What is the total number of employees in your organization with any type of employment?**

Answer	Count	Percentage
1-100 (A1)	884	28.57%
101-250 (A2)	484	15.64%
251-500 (A3)	437	14.12%
501+ (A4)	1078	34.84%
I don't know (A5)	211	6.82%

**Table A A.3. Do you identify as:**

Answer	Count	Percentage
man (A2)	1134	36.65%
woman (A3)	1878	60.70%
other (A4)	6	0.19%
prefer not to say (A5)	76	2.46%

**Table A A.4. What is your level of seniority in your department/organisation?**

Answer	Count	Percentage
Head of General Directorate	31	1.00%
Head of Directorate	219	7.08%
Head of Department	732	23.66%
Employee	2028	65.55%
Other	84	2.71%

<sup>12</sup> (Hellenic Parliament, Presidency of the Democracy, Ministries, Decentralised Administrations, Independent Authorities, legal entities of public and private law) (A1).

<sup>13</sup> (Municipalities, Regions, legal entities under private law and legal entities under public law to which they belong, controlled or funded by local government entities) (A2).

<sup>14</sup> (Insurance Funds, Employment Organizations, Health Service Provider Organizations). (A3).



**Table A A.5. What is your age group?**

Answer	Count	Percentage
under 30 (A2)	27	0.87%
30-50 (A3)	1458	47.12%
over 50 (A4)	1609	52.00%

**Table A A.6. Which region are you based in?**

Answer	Count	Percentage
Attica (A1)	1356	43.83%
Thessaloniki (A2)	446	14.41%
Mainland Greece (apart from Attica and Thessaloniki) (A3)	1009	32.61%
Islands (apart from Attica and Thessaloniki) (A4)	283	9.15%

**Table A A.7. Which of the following is your area of competence?**

Answer	Count	Percentage
General public services <sup>15</sup>	890	28.77%
Defense <sup>16</sup>	14	0.45%
Public order and security <sup>17</sup>	240	7.76%
Economic affairs <sup>18</sup>	194	6.27%
Protection of the environment <sup>19</sup>	69	2.23%
Housing and utility infrastructure <sup>20</sup>	66	2.13%
Health <sup>21</sup>	224	7.24%
Recreation, Culture, Religion <sup>22</sup>	202	6.53%
Education <sup>23</sup>	435	14.06%
Social protection <sup>24</sup>	111	3.59%
Other (A11)	646	20.88%
Don't know (A12)	3	0.10%

<sup>15</sup> (e.g. Executive and legislative bodies, economic and fiscal affairs, external affairs, General services, Basic research) (A1).

<sup>16</sup> (e.g. Military defence, civil defence, foreign military aid) (A2).

<sup>17</sup> (e.g. Police services, fire services, courts, prisons) (A3).

<sup>18</sup> (e.g. General economic, commercial and labour affairs, fuel and energy, mining, manufacturing and construction) (A4).

<sup>19</sup> (e.g. waste management, sewage management, pollution control) (A5).

<sup>20</sup> (e.g. Housing development, utility infrastructure development, water supply, street lighting) (A6).

<sup>21</sup> (e.g. Hospital services, public health services, medical products, devices and equipment) (A7).

<sup>22</sup> (e.g. Entertainment and sports services, cultural services) (A8).

<sup>23</sup> (e.g. Preschool and Primary education, secondary education, tertiary education) (A9).

<sup>24</sup> (e.g. Illness and disability, old age, unemployment) (A10).

# References

- Council of Europe (2000), *Recommendation No. R (2000) 10 of the Committee of Ministers to Member States on Codes of Conduct for Public Officials*, <https://rm.coe.int/16805e2e52>. [8]
- JORF (2013), *Act no. 2013-907 dated 11 October 2013 on transparency in public life*, Official Journal of the French Republic, <https://www.hatvp.fr/wordpress/wp-content/uploads/2018/01/Act-no.-2013-907-dated-11-October-2013-on-transparency-in-public-life.pdf>. [6]
- NTA (2023), *NACAP 2022-2025 IMPLEMENTATION REPORT 1ST SEMESTER 2023*, [https://aead.gr/images/manuals/esskd/2022-2025/NACAP\\_S1\\_2023\\_Final.pdf](https://aead.gr/images/manuals/esskd/2022-2025/NACAP_S1_2023_Final.pdf). [10]
- OECD (2020), *OECD Public Integrity Handbook*, OECD Publishing, Paris, <https://doi.org/10.1787/ac8ed8e8-en>. [3]
- OECD (2017), *OECD Recommendation of the Council on Public Integrity*, <https://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf>. [1]
- OECD (2016), *Committing to Effective Whistleblower Protection*, OECD Publishing, Paris, <https://doi.org/10.1787/9789264252639-en>. [2]
- OECD (2010), *Recommendation of the Council on OECD Legal Instruments Principles for Transparency and Integrity in Lobbying*, <https://legalinstruments.oecd.org/public/doc/256/256.en.pdf>. [9]
- OECD (2003), *Recommendation of the Council on OECD Guidelines for Managing Conflict of Interest in the Public*, <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0316>. [5]
- UN General Assembly (1997), *RESOLUTION ADOPTED BY THE GENERAL ASSEMBLY [on the report of the Third Committee (A/51/610)] 51/59. Action against corruption*, [https://www.unodc.org/documents/commissions/CCPCJ/Crime\\_Resolutions/1990-1999/1996/General\\_Assembly/A-RES-51-59.pdf](https://www.unodc.org/documents/commissions/CCPCJ/Crime_Resolutions/1990-1999/1996/General_Assembly/A-RES-51-59.pdf). [7]
- UNODC (2004), *United Nations Convention Against Corruption*, [https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026\\_E.pdf](https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf). [4]