



# ***Handbook of good practices in the fight against corruption***

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## Key words

Anti-corruption strategy, stakeholder consultation, monitoring and assessment, Greece

**Table 7.1 Good practice fiche**

General information	Specifics	
<b>Name</b>	The process of designing and monitoring of the National Anti-Corruption Plan (NACAP) 2022- 2025 as a good anti-corruption practice	
<b>Context</b>	Greece GDP/cap – (2021) – 19,677 – below average World Bank Control of Corruption – 58.65 – below average Trust in public administration – 24% - below average Population: 10.7 - medium	
<b>Timeframe</b>	2022-2025	
<b>Reference</b>	<a href="http://www.et.gr/api/DownloadFeksApiDaily/?fek_pdf=20220100138">http://www.et.gr/api/DownloadFeksApiDaily/?fek_pdf=20220100138</a>	
<b>Aim and objectives</b>	The initiative aims to develop a holistic and coherent National Action Plan, with specific objectives, within the framework of which targeted interventions of high added value were included and specialised. The <b>main objectives</b> are: <ul style="list-style-type: none"> <li>• The continuous strengthening of citizens' trust in the institutions.</li> <li>• The steady improvement of the investment climate in the country.</li> <li>• The systematic improvement of Greece's score in relevant international and European indices.</li> </ul>	
<b>Estimated cost of the practice</b>	Budget: Medium (50,000-499,999 EUR) HR: Medium (Department of 4-9 people) Tech: Low (No specific technology)	
<b>Expected impact</b>	The expected impact is that the NACAP contributes to the national effort to eliminate conditions conducive to the development and manifestation of corruption, to strengthen the effectiveness of control mechanisms and to enhance integrity, accountability, and transparency.	
<b>Category of corruption risk/ sector prone to corruption</b>	Public administration, private sector, and civil society	
<b>Implementation mechanism</b>	NACAP 2022-2025 was designed through an extensive consultation process. Within this process, more than 44 meetings took place between May and November 2021, with the participation of the main authorities for the design and implementation of related public policies, as well as organisations from the Private sector and the Civil Society.	
<b>Similar practices</b>	Anti-corruption policy assessment in Lithuania	
<b>Stakeholder's mapping</b>	<b>Target group</b>	Private sector and civil society
	<b>Implementation</b>	National Transparency Authority

## Problem

**Limited consultations** with the broad range of stakeholders at the design stage of the anti-corruption strategy can hamper the implementation of the strategy if the relevant stakeholders do not share the ownership of the vision. For instance, in Greece, the lack of consultations in the old National Anti-Corruption Plan (NACAP) 2018-2021 was identified as a major setback during the implementation and monitoring. As a result, the actions of the previous Action Plan were not always clearly defined, and, in many cases, there were no appointed focal points. These conditions made the monitoring of the implementation progress, as well as the evaluation of NACAP 2018-2021, extremely challenging. At the same time, a meaningful **comprehensive consultation process requires significant coordination** endeavours. The new NACAP 2022-2025 in Greece is a case that demonstrates how such a coordination can take place and what its value for the overall action plan is.

### Solution

The NTA's primary concern was to include all the stakeholders [early in the design process](#), in order to co-create NACAP's strategic objectives and structure, and to consult them while choosing and describing the actions to be included. [The National Anti-Corruption Action Plan \(NACAP\) 2022-2025](#) was developed with the participation of various stakeholders, following an extensive consultation process. [More than 44 meetings took place with 24 stakeholders](#) during the second semester of 2021, with participation of public policy stakeholders and representatives from the private sector and civil society.

### *Governance of the NACAP development*

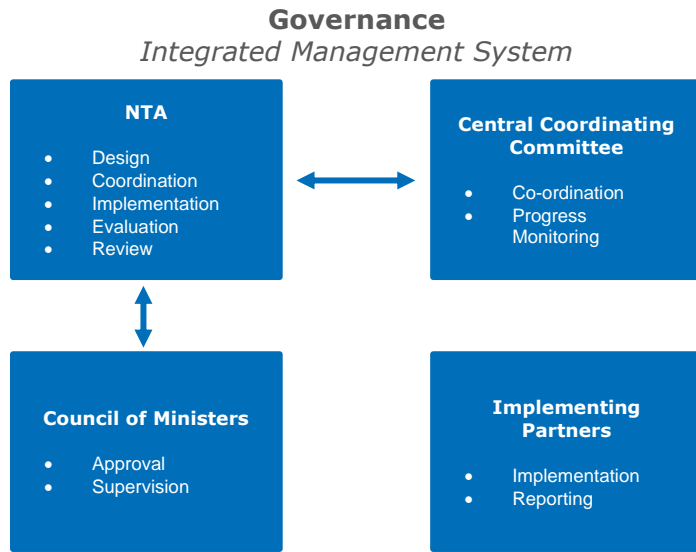
For the coordination of the consultation process, a [Central Coordinating Committee \(CCC\)](#) was established to maximise outreach and ensure ownership and high levels of commitment. The Greek [Cabinet has a supervisory and a strategic role](#) in the CCC, because it approves the final draft of the Action Plan and any major upcoming revision (GG A/163/24.03.2022). Further members of the CCC are representatives of the Presidency of the Government, the General Secretariat for Coordination, and the Ministries of Interior, Finance, Justice, and Digital Governance. The representatives of the Court of Auditors also participate as observers. NACAP 2022-2025 was initially approved by the CCC (on 15 November 2021) and by the Cabinet on 9 March 2022 (Decree No.19/2022 of the Council of Ministers, GG A/138/13.07.2022).

[National Transparency Authority \(NTA\)](#) moderates the process of consultation and monitoring of NACAP's implementation according to article 1 of Law 4915/2022 (GG 63/A/24-03-2022). NTA also plays the role of a major implementation actor in NACAP 2022 – 2025.<sup>433</sup> The General Directorate of Integrity and Accountability has a variety of competencies distributed in various departments relevant to prevention initiatives. As a result, a majority of actions included in the Prevention Part of NACAP 2022 – 2025 will be implemented on behalf of these units, i.e., the implementation of the National Integrity System, the Internal Audit System, etc.

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<sup>433</sup> Available at: [https://aead.gr/images/awareness/2022/Presentation\\_ESSKD\\_2022-2025\\_11.pdf](https://aead.gr/images/awareness/2022/Presentation_ESSKD_2022-2025_11.pdf) (Accessed 11 May 2022)

Figure 7.5 Governance of the NACAP



Source: [https://aead.gr/images/awareness/2022/Presentation\\_ESSKD\\_2022-2025\\_11.pdf](https://aead.gr/images/awareness/2022/Presentation_ESSKD_2022-2025_11.pdf)

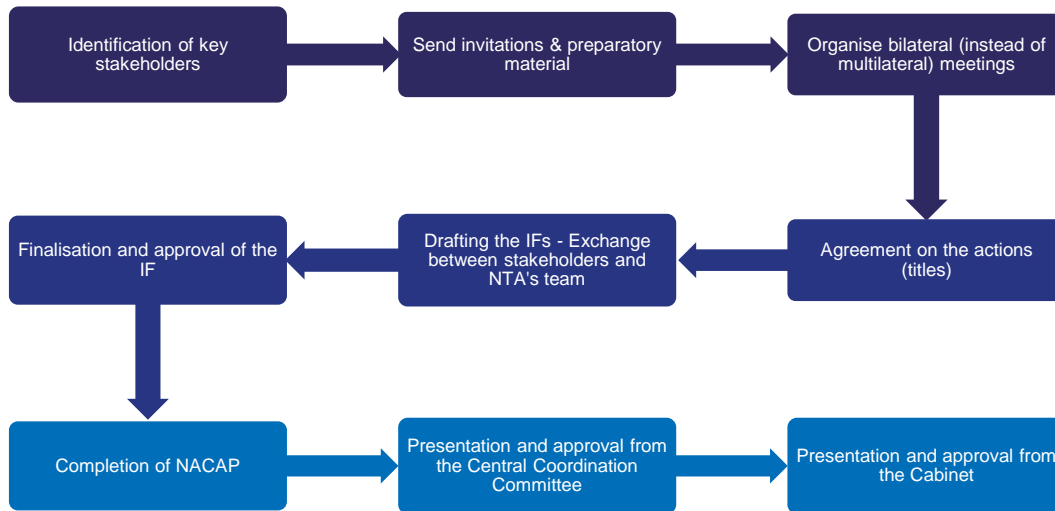
#### Consultation process

Through consultation meetings and the dialogue between the main stakeholders, ideas were generated, and opinions collected (see above for a description of the process). The point of departure was the evaluation of the effectiveness of the previous NACAP (2018-2021), which consisted of the detailed recording and interpretation of the results obtained from the implementation of the actions of NACAP, both for the agencies involved and for each distinct group of beneficiaries (public administration, citizens, businesses).<sup>434</sup> The point of reference for the assessment was the content of National Strategies in other sectors, as well as actions or projects included in the Annual Action Plans from the different Ministries.

The actual development of the new NACAP had an extensive consultation process at its core. It consisted of nine steps depicted in the chart below. Importantly, the steps from three to six, foresee co-creation of actions between the stakeholders. The agreements were presented to the CCC and approved by the CCC and the Cabinet (steps eight and nine).

<sup>434</sup> Available at: [https://aead.gr/images/essays/Ekthesi\\_Apologismou\\_etous\\_2020\\_online.pdf](https://aead.gr/images/essays/Ekthesi_Apologismou_etous_2020_online.pdf) (Accessed 11 May 2022)

**Figure 7.6 Consultation process of the new NACAP**



Source: Greek National Transparency Authority

To develop the actions as specifically as possible, during the design phase, a three-page standardised document – an [action Identification Fiche](#) - was prepared for the description of each action (Step 5 in the chart). The identification fiche includes all the main elements: who is the stakeholder, the descriptive analysis of the action, which will be the necessary steps for the implementation of the action, the deliverables, and the outcomes. During the consultation phase, and after having generally agreed upon the actions to be included, an Identification Fiche was completed for every action by the stakeholders with the strong engagement of NTA. In addition to collaborative development of actions, the Identification Fiches provide necessary information for every action included in NACAP as a point of reference during the implementation and monitoring phase.

**Figure 7.7 Consultation process of the new NACAP - Identification fiche**



Source: Greek National Transparency Authority

The [monitoring mechanism](#) has been revised for simplification and digitisation. The NTA's current main priority is to develop a user-friendly e-form for its implementing partners to fill and submit during the semi-annual monitoring process. This way, NTA will also be able to export all the information automatically, and to receive both qualitative and quantitative comparable, uniform data about the implementation progress of all the actions, thereby enhancing the efficiency and effectiveness of the entire process.<sup>435</sup>

<sup>435</sup> Interview with Official of NTA

### Input

#### *Funds and human resources*

- The **Central Coordinating Committee (CCC)** consists of 9 members, according to Art. 2 Law 4915/2022: the NTA's Governor, seven representatives of the above Ministries, a representative of the Court of Auditors as an observer, and one employee as secretary.
- The CCC is responsible for coordinating and supervising the consultations and finalising the content of the actions included in the NACAP. In addition, it approves changes concerning the content of NACAP actions.
- The CCC comprises representatives from the Presidency of the Government, the General Secretariat for Coordination, the Ministries of Interior, Finance, Justice and Digital Governance and the General Secretariat of Information Systems. The Court of Auditors has observer status. The Governor of the NTA chairs the body. An employee of NTA provides secretarial support. By the decision of the Governor of the NTA, which is posted in the "DIAVGEIA" program, the aforementioned Committee is formed, and its members are appointed.<sup>436</sup>
- The **Council of Ministers** approves the NACAP as well as changes/updates related to the structure, and the strategic and/or special objectives of the Plan. The CoM also monitors the NACAP implementation progress on an annual basis. The Council consists of 27 members.
- The **skills** that are required in order to coordinate all the relevant stakeholders and monitor all the focal points in the implementation of NACAP are workshop management skills, skills related to the organisation of the consultation meetings, the creation of meeting agendas, the assignment of action items after meetings, the creation and management project timelines, deadlines, skills related to working cross-functionally with other departments to ensure organisational objectives are met, and skills related to the development and implementation of new procedures and protocols.

#### *Maintenance*

- As for the coordination, monitoring, evaluation and revision, the National Transparency Authority (NTA) has full responsibility, which are the core competencies of the NTA and do not require extra funding.
- The Department mainly responsible for the design, drawing up, monitoring, evaluation, and revision of NACAP is the Department of Strategic Planning and International Relation of the Strategic Planning and Behavioural Analysis Directorate.<sup>437</sup> The Department has dedicated three employees along with the Head of the Department, to undertake NACAP-related tasks. Each employee also serves as a contact point for certain stakeholders and will continue doing so during the entire life span of NACAP.

### Outcome and impact

The outcome of the consultation process was designing NACAP 2022- 2025 itself. Based on a [three-pronged approach to fight corruption](#), NACAP 2022-2025 is:

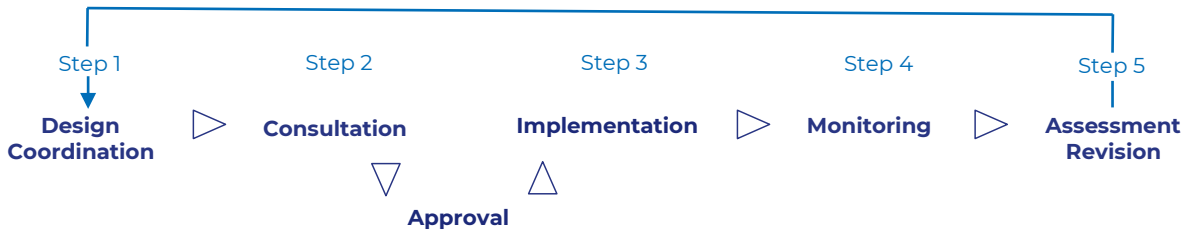
- An integrated national framework for the comprehensive response to corruption in the country and the integration of good international practices.
- A dynamic four-year policy tool for designing, implementing, monitoring, and evaluating horizontal and sectoral actions.
- An effective mechanism for coordinating the action of public policy actors in which synergies are developed with the private sector and civil society.

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<sup>436</sup> of art. 2 of Law 4915/2022 (GG 63/A/24-03-2022)

<sup>437</sup> Decision 11699, Government Gazette 1991/b/24.05.2020 on Organigramme of National Transparency Authority

Figure 7.8 NACAP's policy cycle



Source: [https://aead.gr/images/awareness/2022/Presentation\\_ESSKD\\_2022-2025\\_11.pdf](https://aead.gr/images/awareness/2022/Presentation_ESSKD_2022-2025_11.pdf)

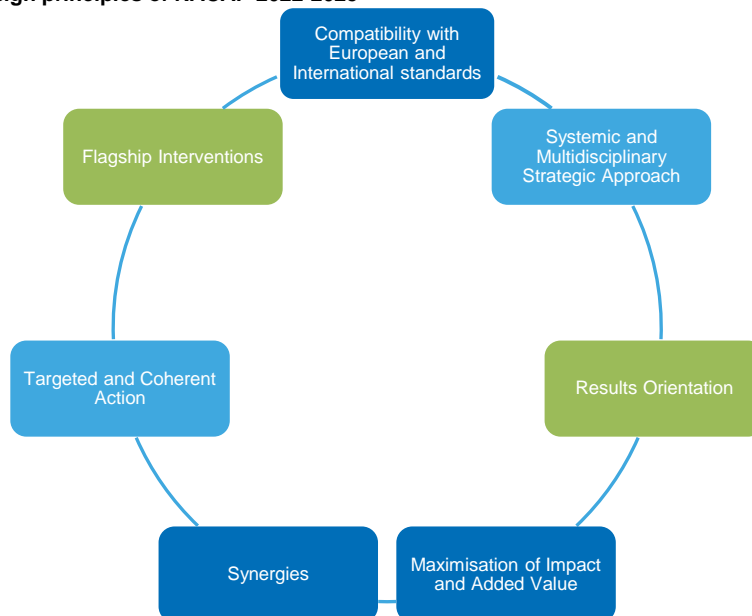
The vision of NACAP 2022 - 2025 is to establish and further deepen the principles of Integrity, Accountability and Transparency in the functioning of state, society, and economy.

The main objective of NACAP is:

- The continuous strengthening of citizens' trust in institutions.
- The steady improvement of the investment climate in the country.
- The systematic improvement of Greece's score in relevant international and European indexes.

At the very centre of the design was the development of a holistic and coherent National Action Plan with specific objectives, within the framework of which targeted interventions of high added value were included and specialised. Another innovative element in NACAP 2022-2025 is the development of a comprehensive set of output and results indicators that will allow the NTA to measure/quantify the outcomes and the impact of the intervention.<sup>438</sup>

Figure 7.9 Design principles of NACAP 2022-2025



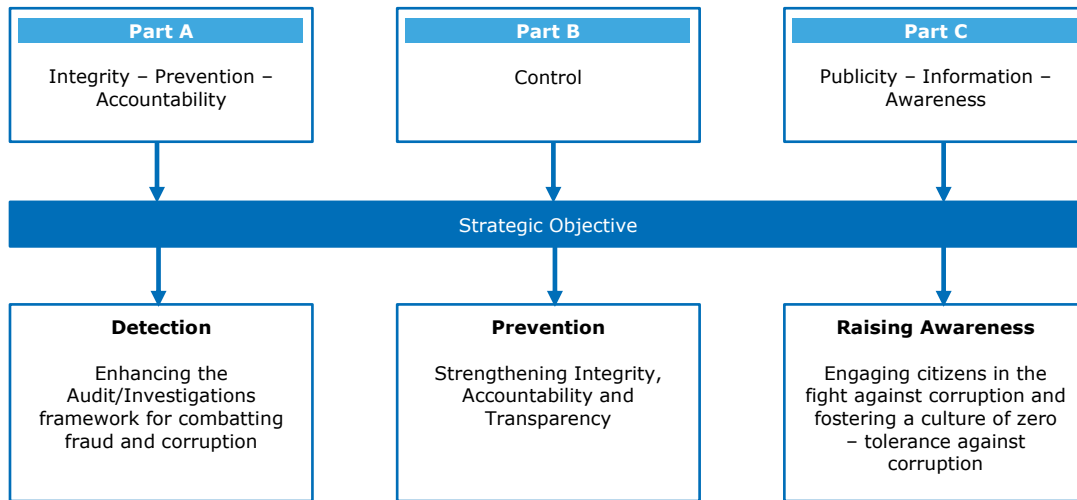
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Considering the above, NACAP 2022-2025 is based on three strategic pillars (with each one forming a distinct part of the Plan). Each part is divided into an additional Strategic Objective as follows:

<sup>438</sup> Interview with Official of NTA



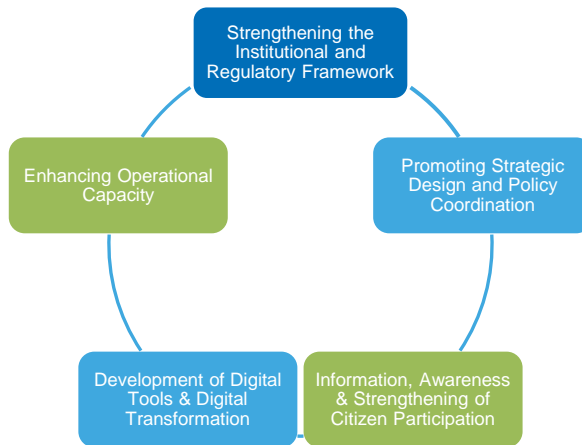
Figure 7.10 Parts and Strategic Objectives of NACAP 2022-2025



Finally, each Strategic Objective is comprised of the corresponding **Specific Objectives**.

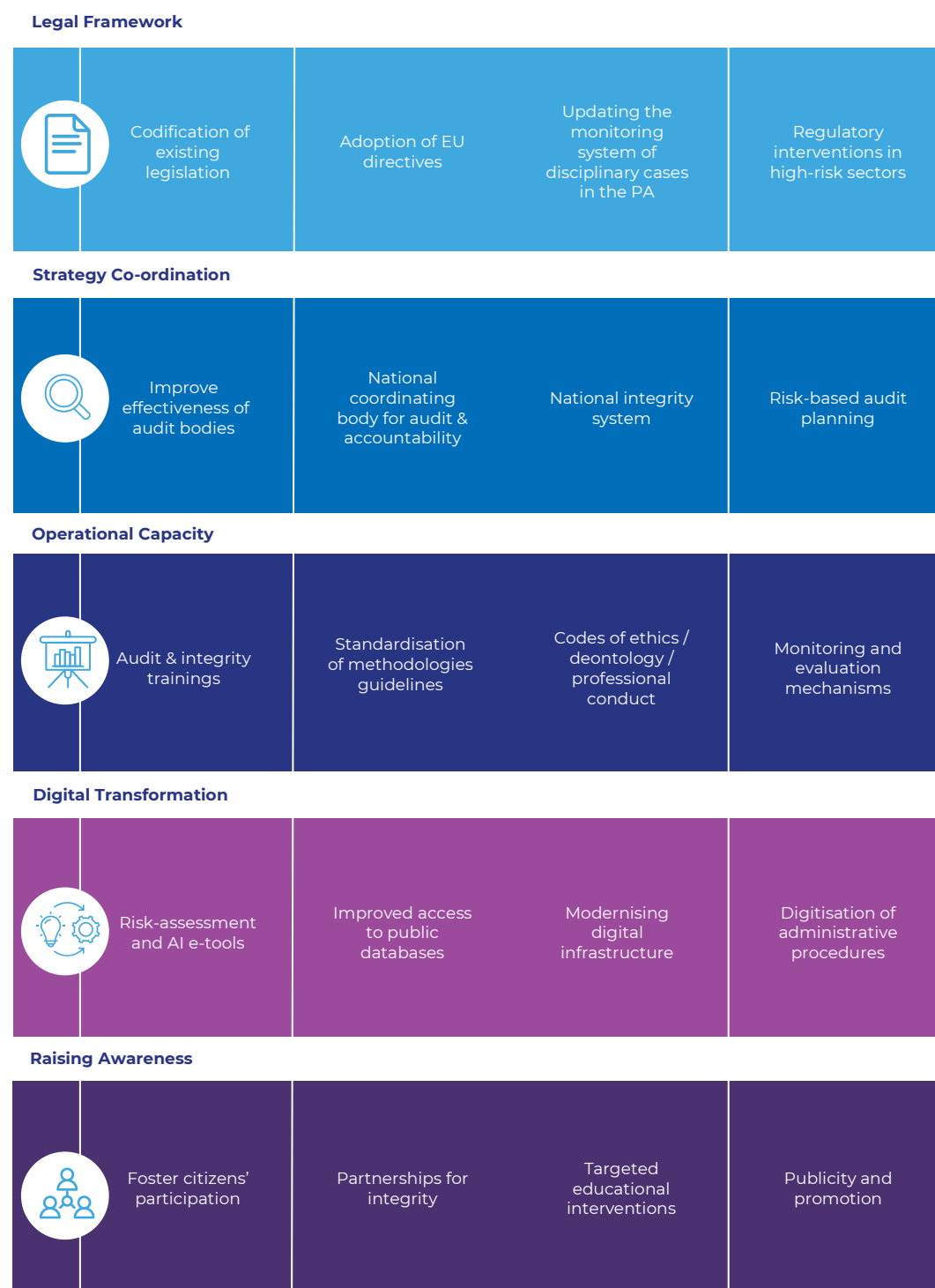
For the first two Parts, the selected Specific Objectives concern the main stages of a public policy's life cycle. For the Third Part of the Awareness, a different approach was chosen. Given the different nature of the interventions, it may incorporate:

Figure 7.11 Specific Objectives of NACAP 2022-2025



NACAP 2022-2025 includes **one hundred and twenty-nine (129)** actions, the scope of which has been specified in cooperation between the NTA and **twenty-four (24)** public policy institutions. The categories of actions contained in the Action Plan are summarised below:

Figure 7.13 Categories of NACAP actions 2022-2025



Source: [https://aead.gr/images/awareness/2022/Presentation\\_ESSKD\\_2022-2025\\_11.pdf](https://aead.gr/images/awareness/2022/Presentation_ESSKD_2022-2025_11.pdf)

The **feedback of NGOs and businesses** has been considered especially in the actions related to raising awareness (actions related to corporate social responsibility and the enhancement of integrity in the private sector and actions related to the awareness and strengthening of citizen participation).

The new NACAP overcomes the **monitoring** shortcomings of the previous one: accordingly, for each action included in NACAP 2022-2025, there is a designated focal point from every stakeholder responsible for submitting all the necessary information about the implementation progress. NTA offers ongoing support through calls, meetings, and any other means necessary. At the same time, some stakeholders have also designated one or two main focal points to ensure inside coordination and smooth implementation of all the actions their agency is responsible for.

## Context

### *Learning from experience*

In most ways, previous NACAP 2018-2021 has been a success story. In particular, for the first time in Greece, a national anti-corruption strategy became operationalised with a set of targeted actions associated with specific goals and a specific completion timeframe. Besides, its design as well as the actions included were aligned with high European and international standards, aiming at both horizontal and high-risk sectors. At the same time, a variety of stakeholders were involved at different stages of development, which already set the basis for the fruitful multistakeholder cooperation in the next strategy.<sup>3</sup>

Unlike the previous strategy, NACAP 2022-2025 was initially approved by the CCC (on 15 November 2021) and after it was officially approved by the Cabinet of Ministers with the provision of Art. 1 of Law 4915/2022 (GG 63/A/24-03-2022). Furthermore, the Cabinet committed to monitor the implementation progress of NACAP annually as well.

## Limitations

As NACAP has been newly adopted, the estimated and unforeseen challenges may become evident in the future. NTA is trying to build better-suited monitoring and evaluation mechanisms while building its capacity and efficiency. It has developed and will keep an open line of communication with other stakeholders in order to detect problems early on and come up with viable solutions while also keeping an updated record of all the international and European recommendations for the prevention and combatting of corruption as well as to build its international networks, to remain on track and exchange views and practical insights peer-to-peer. NTA also intends to initiate a revision process in the middle of NACAP's 2022 – 2025 lifespan to evaluate with their partners possible problems, flaws, threats, etc., and to adopt adequate corrective measures.<sup>439</sup>

**Table 7.2 Analysis fiche**

	Ensuring transferability and applicability		Verifying effectiveness	
Demand analysis	Resource analysis	Output analysis	Medium-term effect	Long-term effect
To overcome shortcomings of the previous National Anti-Corruption Action Plan (NACAP) => develop a comprehensive NACAP, with the tangible actions, developed in a process of multi-	Central Coordinating Committee, consisting of 9 members to coordinate and supervise the consultations and finalise the content of National Transparency	44 meetings with 24 relevant stakeholders from public and private sectors as well as civil society	A holistic and coherent National Action Plan, with specific objectives; a comprehensive set of output and results indicators that will allow the NTA to measure/quantify the outcomes and the impact of the intervention.	Effectively implemented anti-corruption action plan that allows to (1) increase trust in national authorities, (2) steadily improve the country's investment climate, and (3) systematically improve Greece's score in relevant

<sup>439</sup> Interview with Official of the NTA

stakeholder consultations.	Authority (NTA) moderates the process of consultation and monitoring of NACAP's implementation (responsible department consists of the Head and three employees); Required skills: project management, consultation organisation and facilitation.			international and European indexes.
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## 7.2.2 Ireland: "Hamilton Review" – An Engaged and Holistic Approach to Anti-Corruption Reform

### Executive summary

The [Hamilton Review](#) is a collaborative multi-stakeholder process in which anti-fraud and anti-corruption structures and procedures in criminal law enforcement were examined. The aim of the review was to identify areas where Irish anti-corruption system could be strengthened. The resulting "Hamilton Report" made 25 key recommendations, many of which directly address institutional shortfalls in resourcing and coordination, which the Irish government has committed to tackle. While the Hamilton Report did not recommend a single national anti-corruption agency, the reforms envisioned would go some way towards facilitating a [more cohesive and efficacious anti-corruption regime in Ireland](#), as they would close funding and expertise gaps within and across agencies.

### Key words

Anti-corruption policy, multi-stakeholder collaboration, Ireland

**Table 7.3 Good practice fiche**

General information	Specifics
<b>Name</b>	Review of structures and strategies to prevent, investigate and penalise economic crime and corruption
<b>Context</b>	Ireland GDP/cap – (2021) EUR 91,818 – above average World Bank Control of Corruption – (2020) 91.35 – above average Trust in public administration – (2021) 63% – above average Population: 5 m -small
<b>Timeframe</b>	2017- 2020
<b>Reference</b>	<a href="http://www.justice.ie/en/JELR/Hamilton_Review_Group_Report.pdf/Files/Hamilton_Review_Group_Report.pdf">http://www.justice.ie/en/JELR/Hamilton_Review_Group_Report.pdf/Files/Hamilton_Review_Group_Report.pdf</a>
<b>Aim and objectives</b>	Comprehensive review of state's anti-corruption capacity
<b>Estimated cost of the practice</b>	Budget: Low (Below EUR 50,000 or pro bono) HR: High (staff above 10 people) Tech: Low (No specific technology)
<b>Expected impact</b>	Recommendations to enhance anti-corruption capacity