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GREEK & EUROPEAN ECONOMY OBSERVATORY

## **Transparency policy in Greece:**

From citizen empowerment to anticorruption and open data

**Calliope SPANOU & Manto LAMPROPOULOU**



January 2022  
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# Transparency policy in Greece: From citizen empowerment to anticorruption and open data

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## Summary

- Transparency policy emerged as a top-down initiative in the early 1980s as a form of democratization and citizen empowerment.
- The focus of the domestic agenda of transparency policy has shifted over time and has included a wide range of both symbolic and pragmatic initiatives.
- The emphasis of transparency policy has gradually shifted from citizen empowerment and control of public administration to anticorruption, open data and public sector digitalization.
- The term “transparency” seems to have embraced a wide variety of concerns, objectives, procedures, and institutions.
- Up to date, no single policy framework for transparency exists, but it is usually a component of policies such as anti-corruption, open government and digital information.
- The fragmentation of the legislative framework and the competent institutions has been a constant feature of the domestic transparency policies, which has hampered policy coherence and co-ordination over time.
- The formulation, implementation and monitoring of the transparency policy implicates multiple actors across central government along with the growing influence of external experts.
- The role of the civil society and citizen participation in transparency policy remain weak.
- An effort is currently underway to centralize control mechanisms and interconnect existing platforms in order to rationalize the institutional framework for transparency.
- Along with the institutional and technical improvements, the role of transparency for democracy and accountability remains in question and needs to be brought back into the debate.

## 1. INTRODUCTION <sup>1</sup>

Transparency is a fundamental prerequisite of democratic governance. During the recent decades, transparency policies gained importance while their inclusion in the government agenda was often linked to critical public sector reforms. Transparency is not a sector specific policy but cuts across most government functions. It encompasses a broad spectrum of public policies, such as anti-corruption, digital government, accountability, legitimacy, open government, integrity, and good governance (OECD, 2002). And, indeed, it has a direct impact on public sector performance (Mulgan, 2012) and the quality of public service delivery (Bauhr & Carlitz, 2020).

However, the meaning as well as the goals and tools of transparency differ significantly across national and historical contexts (Hood & Heald, 2006; Cucciniello et al., 2017), while they depend on various political, economic, and cultural factors. Major factors affecting transparency are, for instance, the consensual or majoritarian type of democratic regimes (Grimmelikhuijsen & Kasymova, 2015), citizens' participation in policy-making (Kim & Lee, 2019), organizational behaviour (Pasquier & Villeneuve, 2007) and the technology of e-government tools (Pina et al., 2007; Ponti et al., 2021).

Over time, the concept of transparency has evolved, while its practice, outcomes and assessment criteria regarding government action tend to vary among countries. In the EU, certain initiatives have been launched with the aim of enhancing transparency and openness and strengthening the democratic accountability of European institutions (Diamandouros, 2006; European Investment Bank, 2015). These initiatives further refer not only to EU level sectoral policies (Marx & Van der Loo, 2021), but also to member state level, a prime area of concern being the administration of the EU Funds (European Parliament, 2016). Nevertheless, no horizontal guidelines or an integral EU policy framework for transparency in public sector exists, yet. Member states adopt different approaches to transparency policy and therefore develop various practices.

In Greece, existing studies focus on transparency related issues rather than on transparency policy per se. Corruption, and especially political corruption, is a long-standing key topic (Koutsoukis, 2003; Sotiropoulos, 2020), while less attention has been paid to the question of corruption in public administration (Labropoulou, 2012). Factors related to the country's political and public administration culture, for instance rent-seeking and clientelism, provide explanations for domestic corruption, also acknowledging the lack of transparency (OECD, 2012: 16). Other studies focus on certain aspects of transparency policy, such as the access of citizens to administrative documents and information (Spanou, 2010) or digital government and ICT initiatives (Prasopoulou, 2011). Despite the growing importance of transparency in the ongoing public sector reform programmes, up to date no study exists on transparency policy as a distinct field of study.

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<sup>1</sup> A different version of this paper was included in Pastor Albaladejo, G. (comp.) (2021) *Políticas Públicas de Transparencia en las Democracias del sur de Europa*, Valencia: Tirant lo Blanch (La política pública de transparencia en Grecia, Capítulo 5, pp. 293-371).



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This paper aims to provide an overview of the transparency policy in Greece with a focus on public administration. To this end, we explore and critically analyse the origins and the state of play of transparency policy in its different manifestations, namely: open government, governance and civil service standards, access to documents and digital information, internal audit, and lobbying activities. We seek to identify (i) the way by which transparency policy has been embedded in the domestic policy agenda of state reform and evolved over time and (ii) the processes and mechanisms through which transparency policy is currently formulated, implemented and evaluated. The analysis considers legal texts and policy documents as well as available data from primary and secondary sources. Empirical evidence is supplemented by focused interviews.

The rest of the paper is structured as follows: Section 2 sets the background of the transparency policy in Greece, by presenting the demand factors, the actors involved and the way by which transparency has entered the domestic policy agenda and evolved over time, as well as the perceptions of corruption and transparency. Section 3 describes the current regulatory framework for transparency in line with the abovementioned aspects of transparency. In section 4, the focus shifts to the formulation and implementation process of transparency policy, analysing the actors, the implementation plans and instruments and the existing co-ordination mechanisms. Section 5 outlines the control and evaluation tools of transparency policy, also providing empirical data on the outcomes of the relevant initiatives and controls. Section 6 summarizes the key findings of the analysis and concludes by suggesting a set of policy directions for the improvement of the domestic transparency policy framework.

## 2. ORIGINS AND TRAJECTORY OF TRANSPARENCY POLICY

Reforms regarding transparency reflect to a large extent “l’air du temps”. Contrary to more “technical” reforms, transparency issues attract visibility because of their connection to democracy and the terms of citizen-administration relations. On one hand, as a tool for democratic accountability and citizen empowerment, transparency tends to respond to a (potential) social demand that will take advantage and put in use corresponding provisions and procedures. On the other, transparency is a deeply political issue as much as a constant administrative challenge. The effectiveness of any legal provisions depends on the way they are translated into specific regulations and procedures, as they are constantly tested by informal administrative practice.

### *2.1 Agenda setting: a top-down initiative*

To explore the origins of transparency policies one needs to consider the general political context as well as the dominant values and frames of reference of the time. In the Greek context, an ensuing question is whether such reforms were a response to collective (bottom-up) social demands and pressure or rather a (top-down) political initiative.

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The Greek administration belongs to the wider Napoleonic tradition where the citizen is perceived as “*administré*”. Additionally, the historical experience of authoritarian regimes as well as clientelism have shaped a difficult relation between state and citizens, characterized by mistrust and mutual suspicion. Such features rendered citizen-administration relations a fertile ground for reform as an extension of the post-dictatorial quest for democratization. This was the dominant framework of a first wave of important and highly symbolic reforms during the 1980s, when PASOK came to power under the catch-all claim for “change” and public participation.

In the *Declaration of Government Policy, Contract with the People* (PASOK 1981), public administration was presented in an exclusively negative light (as authoritarian, partisan, corrupt). However, it was also seen as one of the “levers and means of change”. The solution was democratization, seeking to establish mutual respect and the equal treatment of citizens. This would “change the administration from a tyrant to a servant of the citizen” (Spanou, 1998). Reforms aimed at transparency, citizens’ access to information, simplification of procedures, and the “social control” of public administration –in the sense of social accountability.

Indeed, that was the window of opportunity, for important steps to be taken in this direction, as particularly reflected in the first law specifically dedicated to state-citizen relations (1599/1986). As part of the “democratization” process, the administration should become extroverted. To this effect the law introduced the principle of openness –or principle of administrative transparency.<sup>2</sup> The law introduced an extensive “right to *know* of administrative documents”, for “all persons”, and explicitly covered all types of documents in the archives of the administration (i.e., beyond the formal definition of an “administrative document”).

What was also groundbreaking at the time was that the “interested person” did not have to prove a “legal interest”, something that according to the Civil Code was until then a necessary requirement for obtaining access to administrative documents. Such an important step towards transparency was accompanied, however, by hesitations. These came mainly from the administration itself but were echoed by MPs during the parliamentary discussion of the bill. Suspicion towards citizens was reflected in the general concern that this right could be used “too widely” or in an abusive way.<sup>3</sup> As a result, a clause was added to the bill allowing the exclusion of certain documents from the right of access, by decision of the Minister of the Presidency and the competent ministers. Later, these hesitations were expressed at the implementation stage, as evidenced by the reluctance of public employees to grant the requested documents, and their tendency to enlarge the scope of exceptions or even to avoid the responsibility of deciding on the issue. Despite open and hidden resistance, this provision took roots and

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<sup>2</sup> This right can be seen as stemming from article 20 par. 1 and 2 of the Constitution, regarding the rights to legal protection and to prior hearing.

<sup>3</sup> Parliamentary Proceedings 22 May 1986, pp. 6949-6952.

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survives to date as part of the Code of Administrative Procedure.<sup>4</sup> Later, the supreme administrative court in its (limited) jurisprudence interpreted this right in connection with a “reasonable” interest.

An additional law (1735/1987) provided for the “social control” of the administration, understood as the possibility of representatives of society to monitor its functioning and the quality of services provided to citizens. It was also a means to detect cases of maladministration and formulate proposals for improvements. This objective was to be served by a series of committees comprising political officials as well as representatives of organised interests (labour unions, civil servants’ union, local government union etc.). Nevertheless, these committees hardly ever operated. The law also established for the first time a central inspection body (Body of Controllers of Public Administration), which started functioning with a delay of three years (law 1892/1990), and in a somewhat different form survived until 2019. This was the first step towards introducing new institutional actors promoting -among other- transparency.

In the early 1990s, the New Democracy government initiated a law (1943/1991) which built on these initiatives but in a different framing. The emphatic use of “administrative modernization” succeeded the “democratization” of the administration as a means of improving citizen-administration relations.<sup>5</sup> The introductory report of the law underlined that *“the objective is to make public services respect their obligations towards citizens [...]. Through procedural transparency any (illegal) transaction is suppressed [...]; in combination with the operation of the Body of Controllers [of Public Administration], it constitutes a favorable condition for citizens to effectively claim their rights”*. Two main requirements were introduced: (i) Publicity regarding the timeframe for the delivery of critical services, which allowed citizens to monitor equal treatment. In this regard, public services had to open to citizens their records with the date of entry of every request (art. 6), and (ii) defined timeframes for service delivery as well as financial compensation for citizens in case these were not respected (art. 5). The law also extended the above mentioned “committees of social control” of public administration, by instituting one committee in each ministry, where economic actors were also represented (such as chambers of commerce etc., art. 9). These committees were meant to examine the effectiveness and efficiency of the services and organizations under the ministry’s responsibility, but quickly fell into inertia.

These initial but also pioneering laws, though serving the same purpose, were discussed in an adversarial climate. Each of the two major parties formulated doubts regarding the need and efficiency of the provisions (e.g. publicity), claimed the paternity of the corresponding ideas (e.g. social control committees), but also showed their distrust regarding the use of such provisions by citizens (access to documents, compensations etc.) and the respect of corresponding obligations by public administration.<sup>6</sup> Symbolic confrontations and overbidding of good intentions for transparency and enhanced citizens’

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<sup>4</sup> Law 1599/1986 had provided for a Committee to prepare the Code of Administrative Procedure. It is significant that the Code was finally adopted in 1999 (2690/1999, as amended since).

<sup>5</sup> Parliamentary Proceedings 13 March 1991, p. 6876.

<sup>6</sup> Parliamentary Proceedings 22 May 1986, pp. 6944, 6947, 6953.

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rights dominated the discussions.<sup>7</sup> Party competition, which more generally affected administrative reform (Spanou, 1996), equally characterized political initiatives in this area.

While during the 1990s the political agenda of the two major parties tended to converge in substance, a continuous slippage can be observed regarding the framing of transparency regulations. In the course of the years, transparency appeared as (i) a procedural substitute for direct citizen participation in government (democratization), (ii) a condition for control and accountability, pointing to the need for administrative monitoring and the development of control mechanisms to ensure the legality and expediency of decisions (including fighting corruption), and (iii) a proactive “open government”, which makes information available (citizen empowerment) but also opens the way for the private sector to (re-)use government data. These different aspects of transparency came to the forefront of the government agenda at different points in time as reflected in the corresponding reforms.

As it will be shown in the next section (3.1), important initiatives of proactive transparency were taken in the context of a domestic agenda for “Open government”. The electoral programmes of PASOK for the 2007 and 2009 elections had placed transparency at the centre, as a requirement for all policies and a means to empower citizens.<sup>8</sup> An interesting and innovative example of such an initiative is the requirement to post on the internet all administrative decisions with a particular focus on those involving public expenditure (Diavgeia portal, see section 4.2). European policies for open data, added to this trend, with a view to the (re-)use of government data by the private sector.

## *2.2 The actors*

The origins of transparency policy point to a political, top-down initiative. In the political debate, the general dissatisfaction with the administration was (and still is) frequently used as an argument for legislative initiatives. This contrasted with the lack of an explicit demand by social actors but fitted the top-down character of most modernizing initiatives in Greece as well as the more generally dominant role of political parties. The visibility and the highly symbolic character of issues relating to citizen-administration relations in general, -including confronting clientelist practices and (administrative) corruption since both benefit from secrecy- render transparency a prime area for political initiatives. For the same reason, transparency offers opportunities for the usual confrontational political game, even when both major parties appear to agree on the basics.

### **Administrative actors**

The top-down, political character of transparency policy initiatives should not obscure the impetus provided at the start by the Directorate for citizen-administration relations of the (then) Ministry of the Presidency (responsible for administrative reform). Since the early 1980s, drawing from international

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<sup>7</sup> Parliamentary Proceedings 13 March 1991, pp. 6860-6877.

<sup>8</sup> PASOK, Programmatic framework, May 2007 and October 2009 [in Greek].

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experience and cooperation (e.g., within the OECD), this service fed the political leadership with ideas that appeared to respond to the social dissatisfaction with the administration. At a time when there was no clearly articulated social demand, it promoted the cause of improving citizen-administration relations and played the role of a “championing administration” (“*administration militante*”, Spanou, 1991). Not only did these initiatives go beyond the active involvement and mobilization of civil society, but also exceeded the preparedness of public administration to integrate the new obligations into its everyday practice. They probably even exceeded the political will to support their implementation. Such an example is the lack of interest to publicize the right of access to documents (and more generally laws 1599/1986 and 1943/1991): while the Directorate had proposed to organize an information campaign regarding these new rights and measures, the political leadership of the time opposed it.

The delay in the actual implementation of the new rights and procedures further testifies to political and administrative hesitations. A decade after the adoption of law 1599/1986, even journalists had hardly used the right to access administrative documents. Furthermore, administrative reluctance to implement it explains that in 2001, the obligation of the administration to reply to queries for information and access to documents under a deadline of 60 days was upgraded to a constitutional rule (art. 10 par. 3 Constitution), entailing sanctions and financial compensation.

### Social actors

Dealing with the administration is mainly an individualized experience. The heterogeneity of users and the lack of interconnection between them do not favor collective organization and articulation of collective demands. The widespread dissatisfaction with the administration did not prove a sufficient condition for social mobilization. Even economic actors or unions did not seem to take advantage of the opportunities offered by their membership in “social control” committees.

More generally, Greek civil society proves rather weak when it comes to non-special-interest groups. Transparency started to be discussed in somewhat wider circles after these early political initiatives. A few civil society organizations emerged with a modernizing objective, which was the politically dominant frame of the 1990s. Their agenda was broader but transparency was closely associated to it. Such NGOs are the *Citizens movement for an Open Society*<sup>9</sup> and *Citizens' Union for "Intervention"*<sup>10</sup>. Together with think-tanks of the same orientation, they supported political initiatives in the direction of strengthening democratic accountability. At the end of 1996, the Greek office of *Transparency International* was established, on the initiative of a group of personalities led by Virginia Tsouderou, a former *New Democracy* minister. Fighting political and administrative corruption was a major focus of this organization, which in 2005 started a series of annual national surveys on corruption (2005-2013).

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<sup>9</sup> It was an initiative of important personalities from the political, academic and the business world. Their objective is “Empowering the civil society of Greece: generating real public involvement in the life of the community and society by modernizing outdated institutions and attitudes”. <http://www.kinisipoliton.gr>

<sup>10</sup> <http://www.koinoniapoliton.gr/>

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Still, these initiatives came from elite groups and their social influence was limited. In contrast, due to the personalities involved, they could find bridges to governments and support measures compatible with their agenda. An example is the establishment of the Ombudsman in 1997<sup>11</sup> (see Ladi, 2011).

### Other institutional actors

During the 1990s, new institutional actors emerged, pursuing transparency among other priorities.

The Greek Ombudsman was created in 1997 and started operating in October 1998. By its mission the Ombudsman became a defender of transparency and a lever for the implementation of corresponding regulations (see section 4.1). More importantly, when examining citizens' complaints, it had the opportunity to identify forms of resistance to transparency and elaborate solutions and policy proposals.

Since the early 1990s, the Greek administration developed control mechanisms which were extremely weak until then. Though not specifically conceived as a means of transparency, their mission regarding inspection and control requires and promotes transparency. This focus on control favoured a gradual slippage from the ex-ante requirement of transparency to fighting corruption. Such new control mechanisms included the *Body of Controllers of Public Administration* (SELDD), reformed in 1997<sup>12</sup> and renamed as *Inspectors-Controllers Body for Public Administration* (SEEDD)<sup>13</sup> as an internal control body of public administration. In 1997 it was granted administrative and operational independence while its powers were strengthened in 2002 (law 3074). Its main mission was to fight corruption, as well as to address issues of maladministration, ineffectiveness, low productivity, and low service quality in the public sector with the aim of enhancing the efficiency and effectiveness of public organizations.

A series of sectoral inspection bodies attached to various ministries came to further strengthen control mechanisms in the Greek administration: The *Inspectors Body for Health and Welfare Services*, the *Inspectors Body for Public Works*, and the *Inspectors-Controllers Body for Transport*. A General Inspector of Public Administration (GEDD) was established in 2002 with a mission to combat corruption and coordinate the proliferating inspection bodies (law 3074/2002), something that proved a difficult task. More specifically, the GEDD was responsible for the good and efficient operation of public administration, for the monitoring, co-ordination, and evaluation of the control bodies and for the prevention and monitoring of maladministration and corruption. The GEDD also chaired the Coordinating Body of Inspection and Control (SOEE).

In the same spirit, law 3492/2006 (art. 12 and art. 4) introduced internal audit in public administration and established Internal Audit Units in all ministries and regions (see section 4.1).

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<sup>11</sup> Law 2477/1997.

<sup>12</sup> Law 2477. The SELDD was first created in 1987 but started operating 3 years later, in 1990.

<sup>13</sup> In 2019 it was merged within the National Transparency Authority (see section 4.1).

### 2.3 The agenda shift: from transparency to anticorruption

As mentioned above, gradually the focus of the policy agenda changed and transparency came to be mainly associated with anticorruption activities. The advent of the economic crisis certainly played a role in this shift. It pushed anticorruption on the domestic agenda as much as on the agenda of the Memoranda with the international lenders. Various changes in the institutional architecture of administrative control bodies took place, among which the creation of the *National Coordinator against Corruption* under the authority of the Prime Minister<sup>14</sup>. This institution operated for a short time (2014-15) and was to bring under the same umbrella all inspection and control bodies (either horizontal or sectoral) that had developed during the previous decades. Symbolically, the term corruption appeared to absorb all other administrative dysfunctions.

The next stage came shortly afterwards, in early 2015, with the creation by the new government of a *General Secretariat Against Corruption* (GSAC) within the ministry of Justice, Transparency and Human Rights. Transparency was openly associated with fighting corruption, which is a fragment of transparency requirements in a democratic state. The most recent episode of this association came after the general elections of July 2019, when the new government established the *National Transparency Authority* (NTA), with a coordinative but also guiding role for inspection and control bodies and with a clear focus on fighting corruption (see section 4.1). The recently approved National Recovery and Resilience Plan “Greece 2.0”<sup>15</sup> includes actions that move in the same direction and aim to increase transparency, fight corruption and strengthen the role of NTA<sup>16</sup>.

Developments regarding transparency policies, which are further examined in the next sections, owe a lot to European Union initiatives and requirements. Beyond the reforms included in the economic adjustment programmes, European Regulations and Directives regarding access to data, public documents etc. pushed in that direction (see section 3) and strengthened the transparency arsenal.

### 2.4 Perceptions of corruption and transparency

At the end of the 2000s, opinion polls<sup>17</sup> showed a deep crisis in terms of trust in state institutions such as the government, the parliament, the political parties, and the administration<sup>18</sup>. The same observation is confirmed in the 2010 opinion poll where the crisis of trust in government was qualified as “structural” and the crisis of representation as “unprecedented” since the restoration of democracy in 1974. Regarding the perceived importance of corruption in the country, 78% believed that many or all government officials were “crooked”; 92% felt that corruption in Greece was very (65%) or rather high

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<sup>14</sup> Law 4152/2013.

<sup>15</sup> ECOFIN, 13 July 2021.

<sup>16</sup> See COMPONENT 4.2: Modernise the public administration (p. 55).

<sup>17</sup> Public Issue, Indicators of Trust in institutions 2009, <https://www.publicissue.gr/1378/institutions-analysis-2009/> and <https://www.publicissue.gr/wp-content/uploads/2009/12/gci-2009.pdf>

<sup>18</sup> In contrast, among state institutions, trust in the Ombudsman as the defender of citizens against state arbitrariness, is high and the highest among independent authorities.



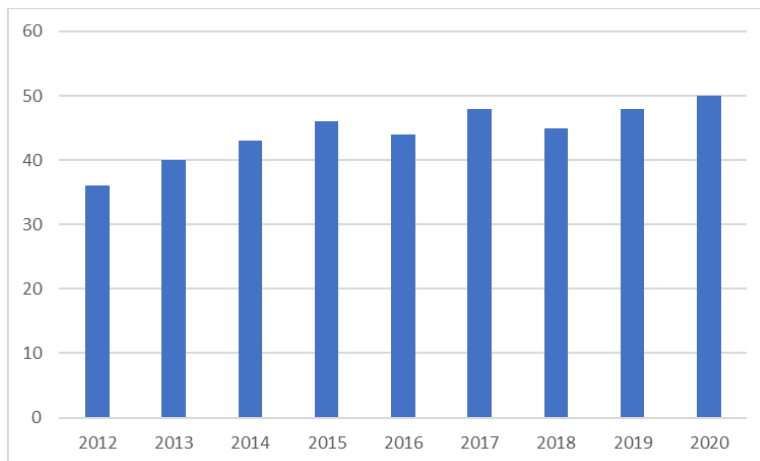
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(27%), and politicians were the first among all groups identified with it (94%, with civil servants at 78%). Furthermore, 60% considered that corruption had increased compared to the past (against 35% as “the same”) and 61% considered that the political system could not fight corruption. Greece had by then entered the first bail-out agreement and disappointment with politics was more than visible.

Ten years later, in 2020<sup>19</sup>, corruption is seen at 98% as a very important (72%) or quite important (26%) problem. The lack of transparency regarding the activities of state bodies ranks 4<sup>th</sup> (94%) as a factor of corruption, following (i) insufficient sanctions and (ii) government indifference (97%), and (iii) parties and clientelism (96%). Additionally, a form of fatalism is expressed by citizens when asked, whether Greece can become a corruption-free country: 57% tend to agree that there will always be corruption (against 34%).

In contrast, according to the TI index, Greece’s scores tend generally to improve in the past decade (Figure 1), possibly as a result of the strengthening of control mechanisms and transparency procedures. Improvement is also recorded as regards the control of corruption in the 1990s and 2000s, while in the 2010s there is no clear trend (Figure 2).

Figure 1. TI Corruption Perceptions Index (2012-2020)



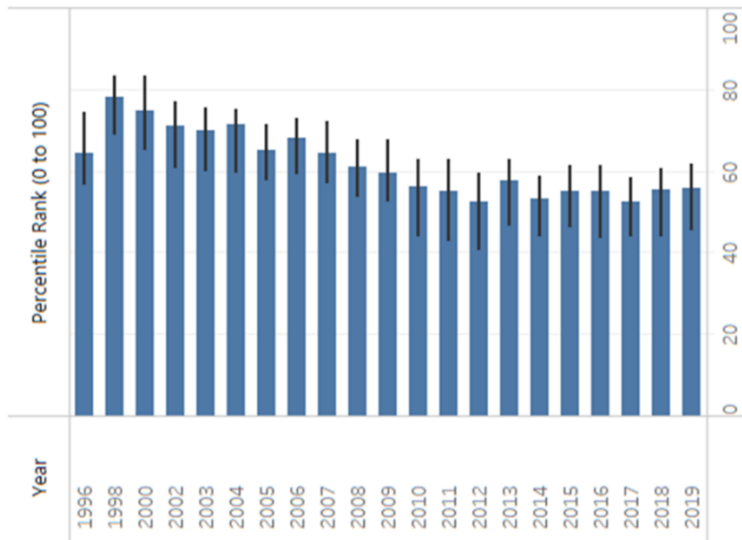
Source: Data based on TI Corruption Perceptions Index

<sup>19</sup> Public Issue, Public opinion and corruption, November 2020 <https://www.publicissue.gr/15355/corrupt2020/>



## Transparency policy in Greece: From citizen empowerment to anticorruption and open data

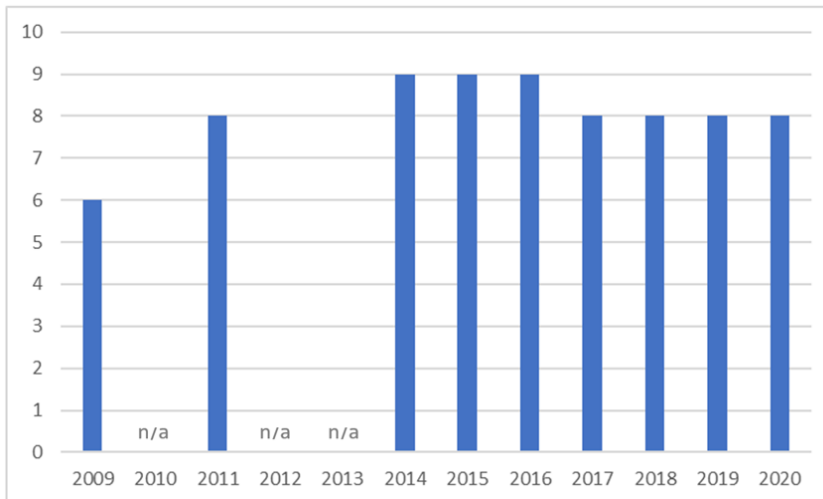
Figure 2. Control of corruption



Source: World Bank Worldwide Governance indicators

Regarding access to government information, available data show improved scores until the mid-2000s and a slight deterioration the following years (Figure 3). Similar trends are observed with regard to Digital Public Services (e-government) EC indicators (though with differentiations among their components<sup>20</sup>) and Open, Useful, Reusable Government Data, which tend to improve (Figures 4 and 5).

Figure 3. Access to government information

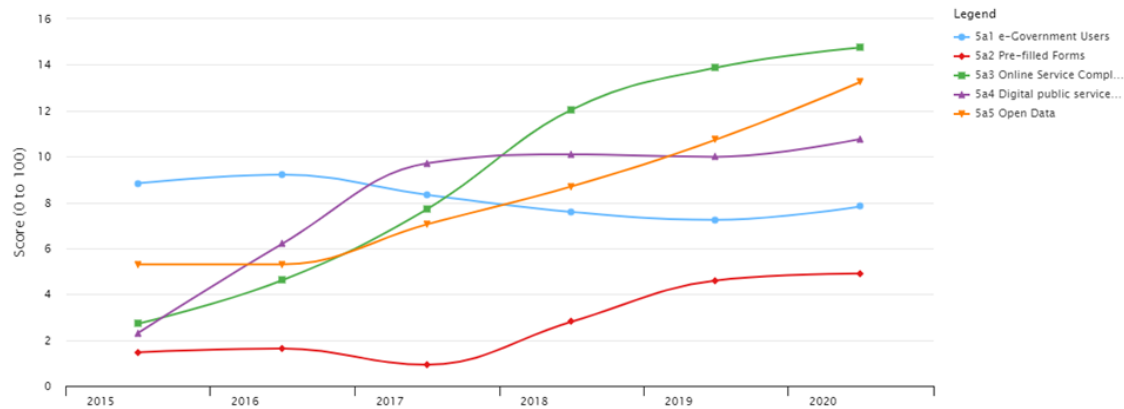


Source: Bertelsmann Stiftung - Sustainable Governance indicators

<sup>20</sup> e-Government Users, Pre-filled Forms, Online Service Completion, Digital public services for businesses and Open Data.

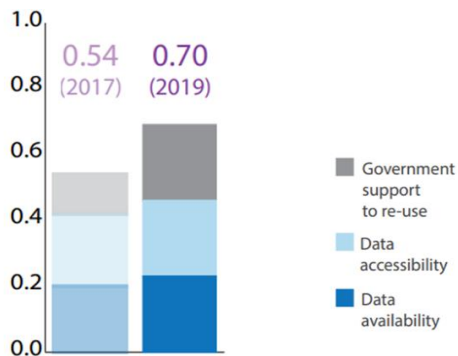
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Figure 4. Digital Public Services (e-government)



Source: European Commission, Digital Scoreboard (Greece)

Figure 5. Open, Useful, Reusable Government Data



Source: OECD (2017, 2019). Survey on Open Government Data

### 3. THE CURRENT REGULATORY FRAMEWORK FOR TRANSPARENCY

As a precondition for accountability, transparency regulations generally reflect areas of mistrust between state and the citizens. This typically regards political and administrative decision-making, i.e., the grounds on which choices are made, the potential illegitimate influences and the information on which they rely. In Greece, certain policy fields are particularly affected by suspicion of partiality or even corruption, such as financial decisions and the management of public funds, as well as recruitment in the public service. This explains why corresponding transparency provisions have at times been included in the Greek Constitution, i.e., to mark a concern at the highest political (and legal) level. Further

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provisions are integrated in laws, presidential decrees and codes regulating different aspects or opening new areas of transparency.

In the current circumstances, law 4622/2019 (chapter on the National Transparency Authority) establishes the principles of transparency and provides for implementation mechanisms (see section 4). This law represents a synthetic approach to central government, embracing in a prominent way the issue of transparency. More specifically, transparency is set as a core principle of good governance and good administration.<sup>21</sup> Transparency and accountability in the operation of central public administration are directly linked to a) consultation procedures in the policy formulation process and mechanisms to integrate its results, b) clear roles and responsibilities of public officials, c) the use of quality information and data for decision making and the accessibility of society to this information, without prejudice to any confidentiality or personal data protection.<sup>22</sup>

The existing regulatory framework falls into two broad areas, namely access of citizens and interested parties to information (section 3.1) and openness of government activities and decisions (section 3.2).

### *3.1 Access to administrative information*

#### Administrative documents and information

This group of regulations aims at facilitating the access of citizens and interested parties to information held by the administration but also at allowing them to actively contribute to illuminating decisions.

Constitutional provisions cover “the right to know”, including access to administrative documents and information and the justification of administrative acts. More specifically, article 5A par. 1 of the Constitution of Greece provides that: “*all persons have the right to information, as specified by law*”. With reference to public administration, this provision establishes transparency as a core principle of administrative action. More specifically, the principle of transparency aims at fighting corruption, guarantees the control of administration, increases its effectivity, and safeguards the rights of the citizens (Anthopoulos & Akrivopoulou, 2015: 26-27).

The Constitution further guarantees the citizens’ right of access to information and the obligation of public administration to provide the necessary information and data: “*The competent (public) service or authority is obliged to reply to requests for the provision of information and for the supply of documents, especially certificates, supporting documents and attestations, within a set deadline (...)*”.<sup>23</sup> These rights are further specified in the Code of Access to Public Documents and Data (see Presidential Decree 28/2015 that gathered provisions regarding access to public documents and data)<sup>24</sup> adding that all

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<sup>21</sup> Art. 19.

<sup>22</sup> Art. 19, par. 3.

<sup>23</sup> Art. 10, par. 3.

<sup>24</sup> Laws 1599/1986, art. 16, the Code of Administrative Procedure, law 2690/1999, art. 5 par. 1, as amended by laws 2880/2001, art. 8 par. 2 and 3230/2004 art 11, par. 2.

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interested parties are entitled to be informed of administrative documents, including documents drawn up by public services, such as reports, studies, minutes, statistical data, circulars and replies.

At the top-government and ministerial level, law 4622/2019<sup>25</sup> specifies the conditions under which citizens have access to the archives of the Prime Minister, Ministers and Deputy Ministers.

In addition, the Code of Good Administrative Behavior (2012), elaborated by the (then) Ministry of Administrative Reform and E-Government in cooperation with the Greek Ombudsman, as a “soft law” instrument, also requires transparency in the behaviour of civil servants. Chapter B.2.9 provides that civil servants should perform their duties “*in a way that facilitates the information of the citizens, the social dialogue, the criticism and the legal control*” and that citizens have the right to be informed about the administrative and private documents that are kept in public services and are related to their cases / interests.

At the local government level, the Municipal and Communal Code<sup>26</sup> provides that the local authorities “ensure the exercise of the right of citizens and residents to access information and guarantee the continuous improvement of the transparency of their action and the strengthening of social cohesion”. The access to the minutes of regional and municipal councils is also guaranteed by Laws 3852/2010<sup>27</sup> and 3463/2006.<sup>28</sup>

### Digital information and the re-use of public sector data

Along with the provisions for administrative documents, access to information applies also to digital information, since according to art. 5A 1, par. 2 of the Constitution “*All persons have the right to participate in the Information Society. Facilitation of access to electronically transmitted information, as well as of the production, exchange and diffusion thereof, constitutes an obligation of the State (...)*”.

Law 4727/2020 replaced most of the provisions of law 3979/2011 (framework legislation for e-governance) and transposed in the Greek legislation the Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information.<sup>29</sup> Prior to law 4727, laws 3448/2006<sup>30</sup> and 4305/2014<sup>31</sup> provided for the open disposal and use of documents, information and data of the public sector as well as for the establishment of a Code of Access to Public Documents and Data (Data.gov.gr, <https://www.data.gov.gr/>). Data.gov.gr is the central directory of public data that provides access to databases of Greek government agencies, bodies and entities along with other platforms providing open data that are described in section 4.2.

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<sup>25</sup> Art. 77-81.

<sup>26</sup> Law 3463/2006, art. 265.

<sup>27</sup> Art. 170, par. 5-8.

<sup>28</sup> Art. 97 par. 5-8.

<sup>29</sup> Art. 59-74.

<sup>30</sup> Art. 1-14.

<sup>31</sup> Art. 1-16.

### 3.2 Openness of government activities and decisions

Transparency regulations aim at shedding light on government activities and decisions. Main areas of concern in this regard are financial decisions including public procurement contracts, recruitment and personnel issues in the public sector, and lobbying activities. All these areas are particularly sensitive to potential illegitimate influence by private interests.

#### Open Government

Setting a general rule, the Standing Orders of the Hellenic Parliament,<sup>32</sup> as amended in 2010<sup>33</sup>, provide that bills and law proposals must be accompanied by an impact assessment report and by a public consultation report that has preceded their submission. This process is assisted by the National Centre for Public Administration and Local Government (EKDDA)<sup>34</sup> as the competent body for the proper operation and management of the *Open Government* website (see section 4.2). Its tasks include the posting of calls for expression of interest for positions in the public sector, as well as of draft laws and regulations that are put into public consultation.

In the same vein, law 4622/2019 sets transparency as a core principle of “Good Regulation” providing for transparency requirements in the formulation of laws and regulatory acts.<sup>35</sup> According to the law, citizens have access to the draft regulations and can submit proposals during their preparation as well as contribute to the evaluation of their implementation (open procedure, art. 58). Therefore, all planned regulations must be publicized with the aim of timely information and participation of every interested party. The law also defines the competent bodies as well as the duration of the consultation process<sup>36</sup>.

#### Digital transparency and open data policy

An important step in transparency has been Open data policy as introduced by law 3861/2010<sup>37</sup> (“Enhancing Transparency with the Mandatory Uploading and Disclosure of Laws and Acts of the Government Administrative and Local Government Authorities, Project “Clarity”-diavgeia”). It established the online publication of all acts, decrees, and decisions, as a condition of their validity, meaning that they cannot be executed without prior disclosure on the electronic platform. This law was replaced in 2020 by law 4727/2020, which maintained and enriched existing provisions regarding Digital Transparency and the Diavgeia Program<sup>38</sup>. The provisions of the law apply to all governmental, administrative and local government agencies, namely the Prime Minister, the Council of Ministers and collective government bodies, Deputy Ministers, General Secretaries, Special Secretaries, the

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<sup>32</sup> Art. 85, par. 3.

<sup>33</sup> Government Gazette 139/A'/10.8.2010.

<sup>34</sup> Presidential decree 105/2018, art. 9, par. 4.

<sup>35</sup> Previous law 4048.

<sup>36</sup> Art. 61 and 63.

<sup>37</sup> Amended by laws 4210/2013 (art. 23) and 4305/2014 (art. 15-16).

<sup>38</sup> Art. 75-83.

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management of legal entities of public law (NPDD), the independent and regulatory administrative authorities, the Legal Council of the State, the management of entities of the wider public sector, as well as of the first and second tier local government units.

Access to governmental information and transparency of administrative action are technically safeguarded through an electronic platform entitled “Diavgeia” (see section 4.2). This platform has been operational since October 2010 and all public authorities are obliged to upload all administrative acts of financial or administrative content, such as appointments decisions, grants, transfers of personnel and decisions on state subsidies to citizens (European Commission, 2020c: 12).

### Lobbying activities and interest representation in decision-making

A legislative framework regulating interest representation and lobbying activities in public decision-making has been most recently (and for the first time) established by law 4829/2021. The main principles and the objectives of the regulation are to promote integrity, transparency, and the equal access of lobbyists to the decision-making processes. This regulation came largely as the result of external recommendations and pressures aiming at scrutinizing lobbying activities.<sup>39</sup> The law aims at promoting transparency in lobbying activities that involve contacts of special interest representatives with public officials / civil servants of the legislative and executive branches of government.

The law further requires the creation of a public register of lobbyists and an obligation for all interest representatives to register. Lobbyists should provide accurate and up-to-date information and must submit an annual report (statement) on their lobbying activities aiming at influencing public decision making<sup>40</sup>. The register will be publicly accessible via the central digital government platform (gov.gr).<sup>41</sup> The implementation of this policy including compliance to corresponding obligations are assigned to the NTA, which oversees the register and verifies the accuracy of the information provided.

### Selected areas of transparency

The long-standing widespread skepticism regarding more particularly the selection and recruitment procedures in the civil service had already led to the establishment of an independent authority and special provisions in the Constitution of Greece: “*The law may provide for special selection procedures that are subject to increased guarantees of transparency and meritocracy*”.<sup>42</sup> The Supreme Council for Civil Personnel Selection (ASEP)<sup>43</sup> is responsible for the respect of transparency, publicity, objectivity and meritocracy in the civil personnel selection. The Civil Servants Code<sup>44</sup> further provides that the recruitment / appointment of civil servants is based on the principles of equal opportunity for participation, meritocracy, objectivity, social solidarity, transparency and publicity.

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<sup>39</sup> See for instance Council of Europe, 2017; OECD, 2021a and 2021b.

<sup>40</sup> Art. 9-10.

<sup>41</sup> Art. 8.

<sup>42</sup> Art. 103, par. 7.

<sup>43</sup> ASEP was first established in 1994 (law 2190) and was endowed with Constitutional guarantees in the revision of 2001.

<sup>44</sup> Law 2683/1999, art. 12.

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At the local government level, the Greek Constitution<sup>45</sup> provides that the State shall adopt the legislative, regulatory, and fiscal measures required for ensuring transparency in the management of the funds of local government agencies. In addition, law 3852/2010 (“Kallikratis”) provides, among others, that the organizational structure of all municipalities should include transparency units<sup>46</sup> and that the organization of regional services should ensure adequacy and quality, transparency and equity, in order to better serve the citizens<sup>47</sup>.

Table 1 summarizes the current regulatory framework and key provisions for transparency in Greece.

*Table 1. The current regulatory framework for transparency*

<b>Administrative documents and information</b>		
The Constitution of Greece	Article 5A 1	Right to information Right to participate in the Information Society
	Article 10, part 3	Provision of information and supply of documents
Presidential Decree 28/2015		Codification of provisions for access to public documents and data
Law 4622/2019	Articles 77-81	Access to the archives of the Prime Minister, Ministers and Deputy Ministers
Law 2690/1999 (and amendments) (Code of Administrative Procedure)	Article 5	Access to documents
Law 3463/2006 (Municipal and Communal Code)	Article 265	Citizens’ access to information Transparency of local action
Law 3463/2006 Law 3852/2010	Article 97, par. 5-8 Article 170, par. 5-8	Access to the minutes of regional and municipal councils
Code of Good Administrative Behaviour (2012)	Chapter B.2.9	Citizens’ access to / information of the documents kept in public services
<b>Digital information and the re-use of public sector data</b>		
The Constitution of Greece	Article 5A 1	Right to information Right to participate in the Information Society
Law 4727/2020	Articles 59-74	Open disposal and re-use of documents, information and data of the public sector
	Articles 75-83	Digital Transparency – “Diavgeia Program”
<b>Open Government</b>		
Standing Orders of the Hellenic Parliament	Article 85, par. 3	Public consultation reports accompanying bills and law proposals
Presidential decree 105/2018	Article 9, par. 4	Operation and management of the Open Government website
Law 4622/2019	Article 58	Good regulation principles (Transparency – law formulation)
	Article 61	Public consultation process

<sup>45</sup> Art. 102, par. 5.

<sup>46</sup> Art. 97.

<sup>47</sup> Art. 186, β, iv.

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	Article 63, par. 6	Posting of draft laws and regulatory impact assessment on Open Government website
<b>Digital transparency and open data policy</b>		
(Law 3861/2010) (Law 4210/2013) (Law 4305/2014)	Articles 1-10 Article 23 Articles 15-16	Establishment of the “Diavgeia” Program - Publication of all acts, decrees and decisions on the internet
Replaced by Law 4727/2020	Articles 75-83	
<b>Interest representation / lobbying activities</b>		
Law 4829/2021	Articles 1-13	Regulation of lobbying activities in public decision-making (legislative and executive branch) Public registers of lobbyists / interests
<b>Selected areas of transparency</b>		
Selection and recruitment procedures in the civil service: Constitution of Greece Law 2683/1999 (Civil Servants Code)	Article 103, par. 7 Article 12, par. 2	Transparency, publicity, objectivity and meritocracy in the civil personnel selection
Local government: Greek Constitution Law 3852/2010 (“Kallikratis”)	Article 102, par. 5 Article 97 Article 186, β, iv	Transparency in the management of the funds of local government agencies Transparency units (Municipalities) Adequacy and quality, transparency and equity in service provision (Regional services)

### 3.3 Limits for transparency

The above regulations introducing transparency requirements are circumscribed by public interest concerns as well as by the protection of individual rights. At the Constitutional level, it is provided that restrictions to the right of information “...may be imposed by law only insofar as they are absolutely necessary and justified for reasons of national security, of combating crime or of protecting rights and interests of third parties”.<sup>48</sup> In the same vein, all persons have the right to be protected from the collection, processing, and use, especially by electronic means, of their personal data, as specified by law.<sup>49</sup>

Such limitations are specified in European as well as national level regulations. According to article 23 par. 1 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection) (see also law 4624/2019), restrictions may be imposed on the right (of access) to information as regards the processing and the free movement of personal data, in view of safeguarding:

<sup>48</sup> Article 5A par.1.

<sup>49</sup> Art. 9A.



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- national security,
- defence,
- public security,
- prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of, threats to public security,
- other important objectives of general public interest, including monetary, budgetary and taxation matters, public health and social security,
- the protection of judicial independence and judicial proceedings,
- the prevention, investigation, detection, and prosecution of breaches of ethics for regulated professions,
- a monitoring, inspection or regulatory function connected, even occasionally, to the exercise of official authority in certain cases,
- the protection of the data subject or the rights and freedoms of others,
- the enforcement of civil law claims.

The protection of personal data in Greece is ensured by an independent authority, namely the Hellenic Data Protection Authority (HDPA), which was established in 1997 (law 2472) and received Constitutional status in the revision of 2001. HADP is responsible for the implementation of the General Data Protection Regulation (GDPR) and the provisions of laws 4624/2019 and 3471/2006 on the protection of personal data and privacy by both public and private organizations.

Additional exceptions to the publication of documents as well as restrictions and limitations of the processing and disclosure of personal data are defined by law 4727/2020<sup>50</sup> (which incorporated European regulation), specifying that *“from the obligation of publication are exempted the documents and data of public contracts that are obligatorily registered in the Central Electronic Register of Public Procurement (KIMDIS) of article 11 of Law 4013/2011, which operates in the General Secretariat of Information Systems”*. Furthermore, to protect personal data and disclosed information the law provides that the acts *“(…) shall be posted on the Internet and the search for information shall be organized without prejudice to national and Union rules for the protection of individuals with regard to the processing of personal data”*. Therefore, no acts should be posted that include special categories of personal data or involve public secrecy issues, intellectual and industrial property rules, as well as corporate or other secrecy provided by specific provisions.<sup>51</sup>

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<sup>50</sup> Art. 76, par. 4.

<sup>51</sup> Law 4727/2020, art. 79.

**Transparency policy in Greece: From citizen empowerment to anticorruption and open data***Table 2. Limits for transparency*

Constitution of Greece	National security, combating crime protecting rights and interests of third parties.
Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and Law 4624/2019	National security, defence, public security, prevention, investigation, detection / prosecution of criminal offences / execution of criminal penalties, objectives of general public interest, judicial independence and judicial proceedings, ethics for regulated professions, exercise of official authority, etc.
Law 4727/2020	Documents and data of public contracts that are obligatorily registered in the Central Electronic Register of Public Procurement. Special categories of personal data, public secrecy issues, intellectual and industrial property rules, corporate or other secrecy.

## 4. POLICY FORMULATION AND IMPLEMENTATION

The formulation and implementation of transparency policy involves various bodies and institutions across the government, administrative and parliamentary spheres, as well as international and non-governmental organizations. In most cases, along with transparency, their tasks include a range of related competences, namely open government, accountability, integrity and fighting maladministration and corruption. Particularly after 2010, a series of organizational changes were introduced because of the rising concerns for increased transparency and anticorruption.

### 4.1 Institutional actors

#### Government bodies

##### *Ministry of Digital-Governance*

The Ministry of Digital Governance (Division of Open Government and Transparency)<sup>52</sup> is the competent ministerial structure involved in the planning and implementation of open government and transparency policies in the public sector. The Department of Open Government and Transparency is responsible for<sup>53</sup>: the design, implementation, monitoring and continuous improvement of policies on open government and open data as well as for the promotion of the necessary regulations and actions for their implementation; the monitoring and continuous improvement of the implementation of open government standards and open data; the planning, operational management and submission and promotion of the implementation of proposals for the optimization of horizontal open government

<sup>52</sup> Law 4704 (art. 22) and Presidential Decree 40/2020 (art. 19, par. 6).

<sup>53</sup> Law 4704, art. 22.

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applications, in particular of the Registry for Subsidized Bodies, the “Diavgeia” program, as well as the Open Data portal; and the monitoring of Regulation 2018/1807 on a framework for the free flow of non-personal data in the European Union. The Division of Open Government and Transparency is also responsible for the drafting, monitoring and implementation of the Open Government Action Plan (OGAP), in line with the Charter of the Open Government Partnership Initiative (OGP) (4<sup>th</sup> National Action Plan on Open Government 2019-2021: 5).

*National Transparency Authority (NTA)*

The *National Transparency Authority (NTA)* was established in 2019<sup>54</sup> and is the main actor for the planning, co-ordination, implementation, and monitoring of transparency policy. The establishment of the NTA marked a shift towards a new centralized organizational model via the merger of control bodies and institutions into a single authority. This aimed at addressing institutional fragmentation and the lack of coordination among different control bodies (European Commission, 2020c: 5-6). The audit authorities and inspection bodies that were transferred to (and merged into) the NTA are the Inspectors–Controllers Body for Public Administration (SEEDD), the General Inspector of Public Administration (GEDD), the Inspectors Body for Health and Welfare Services, the Inspectors Body for Public Works, and the Inspectors-Controllers Body for Transport.

The NTA also integrated the competences of the General Secretariat Against Corruption (GSAC) of the (then) Ministry of Justice, Transparency and Human Rights that was established in 2015.<sup>55</sup> It replaced the National Coordinator against Corruption which was established in 2013 (see section 2.3). The GSAC was responsible for ensuring the coherence and effectiveness of the national anti-corruption strategy and the coordination of control bodies and the effectiveness of their actions and was the national Anti - Fraud Coordination Authority (AFCOS), until 2019 when it was integrated into the NTA.

The establishment of the National Transparency Authority (NTA) as a key institution for safeguarding transparency, represents a response to recommendations included in a series of evaluation reports regarding the implementation of the country's commitments to fight corruption, stemming from international conventions. These policy inputs include the conclusions and proposals of the working group of the Organization for Economic Cooperation and Development (OECD) to combat bribery of foreign public officials in international business transactions, the findings from the review of the implementation of the Convention of the United Nations (UN), the findings and recommendations of the Group of States against Corruption (GRECO) of the Council of Europe Conventions, as well as the findings of the Financial Action Task Force (FATF) for Greece (NTA, 2020: 24).

The NTA is an independent authority without separate legal personality, operationally independent, and endowed with administrative and financial autonomy. It is not subject to control or supervision by government bodies, agencies, or other administrative authorities. The NTA is entrusted with a range of horizontal responsibilities that include not only carrying out controls but also formulating policy in this area (NTA, 2020: 24). The main objectives pursued by the NTA are to (i) enhance transparency, integrity,

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<sup>54</sup> Law 4622.

<sup>55</sup> Law 4320.

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and accountability in the action of government bodies, administrative authorities, government agencies, and public bodies, and (ii) prevent, detect and deal with fraud and corruption in the action of public and private bodies and organizations.<sup>56</sup> The NTA is also the Hellenic Anti-Fraud Coordination Service (AFCOS).

With a focus on transparency policy, the key responsibilities of NTA include<sup>57</sup>:

- the central planning and coordination of all necessary actions to enhance transparency and accountability in the action of governmental and public entities and bodies,
- the central planning and coordination of all necessary actions to prevent, deter, detect, and suppress acts and phenomena of fraud and corruption, raise awareness, educate and change societal standards on the issues of transparency, integrity and fight against corruption,
- the preparation, monitoring, evaluation, and redesign of the National Anti-Corruption Strategic Plan,
- the carrying out of audits, re-inspections, inspections, and investigations,
- the design and development of the National Integrity System,
- the strengthening of transparency in the areas of entrepreneurship and competitiveness to support growth and attract foreign direct investment,
- the supervision and coordination of government agencies and organizations implementing anti-corruption programmes and actions, as well as the evaluation and monitoring of the results of their action.

The NTA's scope of control covers both the public and the private sector, including Ministries and other central government organizations, public or private law legal entities of central government, local authorities, enterprises and public or private law legal entities supervised by local authorities, public authorities or companies managed by the public sector, private entities, and individuals, as summarized in Table 3 (NTA, 2020: 15).

Table 3. NTA's scope of control

Sector	Scope of Control - Obligated Subjects
Public sector	Ministries and central government organizations
	Legal entities of public or private law
	Local authorities (first and second tier)
	Enterprises and public or private law, legal entities supervised by local authorities
	Public authorities or companies managed by the public sector
Private sector	Private entities
	Individuals

Source: Authors' own elaboration based on NTA, 2020: 15 and law 4622/2019

The governing bodies of the Authority are the Board of Directors (composed of 5 members) and the Governor, who are appointed for a 5-year term through special selection procedures.

<sup>56</sup> Law 4622/2019, art. 82.

<sup>57</sup> Law 4622/2019, art. 83.

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The activity of NTA is subject to parliamentary scrutiny. The Special Standing Committee on Institutions and Transparency is responsible for exercising parliamentary control on the NTA. The Annual Report of the NTA is submitted by the Governor of the Authority to the President of the Hellenic Parliament and to the competent parliamentary Committee and is publicized on NTA's website. In exceptional cases, upon request, the Authority is obliged to submit to the Prime Minister and the President of the Hellenic Parliament special reports on issues that fall within its scope of competence.<sup>58</sup>

The NTA covers geographically the whole country. Along with the NTA's central unit in Athens, regional offices operate in Thessaloniki, Larissa, Patras, Serres, Tripoli and Rethymnon. It cooperates with other institutions (such as the competent judicial and prosecutorial authorities and all administrative authorities and bodies exercising responsibilities of financial control, accountability, transparency and fight against fraud and corruption), providing assistance, if requested, to those authorities. The Authority also undertakes horizontal actions in cooperation with the Independent Public Revenue Authority (IPRA). Its staff consists of personnel either under public law (civil servants) or on private law contract of unlimited duration.

*National Coordinating Body for Audit and Accountability*

The National Coordinating Body for Audit and Accountability (NCBAA/SOEL) replaced the Coordinating Body for Inspection and Control (SOEE) and is operating under the auspices of the NTA. The NCBAA is the competent body for the coordination of the fight against corruption.<sup>59</sup>

The NCBAA is also responsible for the preparation of operational programmes which support the National Strategic Plan against Corruption (NACAP) (see section 4.2), for conducting inspections, audits and investigations by joint teams of inspectors-auditors of the authorities, bodies and services that participate in it, for identifying training needs of the members of these authorities, bodies and services, for raising public awareness on issues of transparency, anti-corruption, good practices and attitudes in the relations between citizens and public bodies or government officials, for detecting overlaps of responsibilities and creating synergies among public bodies and services involved in the fight against fraud and corruption, and other responsibilities that are described in the Internal Rules of Operation of NCBAA.<sup>60</sup> NCBAA also aims at the development of systematic dialogue and exchange of views between all authorities, bodies and services involved in the control of public bodies and in the fight against corruption, and at the dissemination of good practices and innovative methodological approaches and tools through the development of common standards and tools.<sup>61</sup>

According to the recent re-composition of NCBAA, its plenary session includes different authorities, bodies and services that are presented in Table 4.

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<sup>58</sup> Law 4622/2019, art. 85, par. 1.

<sup>59</sup> Law 4622/2019, art. 103.

<sup>60</sup> No. 1256/2021 decision of the Governor of NTA.

<sup>61</sup> Law 4622/2019, art. 103.

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Table 4. Authorities, bodies and services participating in NCBA

NCBA plenary session
National Transparency Authority
Financial Police Directorate
Internal Affairs Service of the Security Forces
Directorate of Financial Inspection of the General Staff of National Defence
Service of Internal Affairs of the Ministry of National Defence
Inspection Directorate of the Ministry of Foreign Affairs
Internal Audit Department of the Independent Authority for Public Revenue
Directorate of Internal Affairs of the Independent Authority for Public Revenue
General Directorate of the Financial Crime Prosecution Body of the General Secretariat of Tax Policy and Public Property of the Ministry of Finance
General Directorate of Financial Controls of the Ministry of Finance
Financial Control Committee of the Ministry of Finance
Health Expenditure Control Service of Social Security Institutions of the National Organization for the Provision of Health Services (EOPYY)
General Directorate of the Body of Environmental, Construction, Energy and Mining Inspectors of the Ministry of Environment and Energy
Cybercrime Prosecution Directorate of the Hellenic Police Headquarters

Source: No. 1256/2021 decision of the Governor of NTA

### *Anti-Fraud Coordination Service*

The NTA has been designated as the Hellenic Anti-Fraud Coordination Service (AFCOS) in collaboration with the Financial Crime Prosecution Body.<sup>62</sup> According to Regulation (EU, EURATOM) No 883/2013 of the European Parliament and of the Council of 11 September 2013 (art. 3), its mission is to facilitate effective cooperation and exchange of information with the European Anti-Fraud Office (OLAF) and may be regarded as a competent authority for the purposes of the above Regulation.

### *The Greek Ombudsman*

Transparency is an important dimension of the Ombudsman's activity in ensuring administrative accountability. The Greek Ombudsman is a constitutionally established independent authority<sup>63</sup> (founded by law 2477/1997, amended by law 3094/2003). Its main mission is to mediate between citizens and public services, local authorities, private and public organizations with the aim of protecting citizens' rights and freedoms, combating maladministration, and ensuring legality, as well as defending

<sup>62</sup> Law 4622/2019, art. 82, par. 5.

<sup>63</sup> The Ombudsman is one of 5 such independent authorities which received in 2001 Constitutional status, involving increased guarantees of independence. The others are: the Hellenic Data Protection Authority (HDPA), the Supreme Council for Civil Personnel Selection (ASEP), Hellenic Authority for Communication Security and Privacy (ADAE) and the National Council for Radio and Television (ESR).

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and promoting children's rights, gender equality and antidiscrimination.<sup>64</sup> With reference to transparency issues, the current legislative framework provides that the Ombudsman “*shall investigate cases in which an individual or collective public body (...) commits or omits a due legal act, in violation of the principles of fair administration and transparency or in abuse of power*”.<sup>65</sup>

The Ombudsman’s jurisdiction extends over the public sector, local and regional authorities and other public bodies, state private law entities, public corporations, local government enterprises whose management is directly or indirectly determined by the state by means of an administrative decision or as a shareholder.<sup>66</sup> The Greek Ombudsman cannot impose sanctions on public administration or annul illegal actions but makes recommendations and proposals with the aim of improving the operation of public services and public administration. These organisational and legislative proposals may refer to the simplification of administrative procedures as well to the achievement of transparency in the operation of public administration<sup>67</sup> (OECD, 2018c: 32).

However, the development of regulations regarding personal data protection (and the corresponding Hellenic Data Protection Authority)<sup>68</sup> emerged as an antagonistic requirement. The administration tended to use it as an excuse for refusing access to information. At times, borders between transparency and protected opacity appeared unclear.

#### *Hellenic Single Public Procurement Authority (HSPPA)*

As already mentioned, public procurement is a sensitive area regarding transparency. A major role is entrusted to the Hellenic Single Public Procurement Authority (HSPPA), an independent authority which was established in 2011. Along with its core competences of planning, implementation and monitoring of the national public procurement strategy, HSPPA aims at ensuring transparency, efficiency, cohesion and compliance of public procurement procedures, systems and contracts with the national and the EU legislative framework.<sup>69</sup> The Authority enjoys operational independence, administrative and financial autonomy and is not subject to control or supervision by government bodies or any other independent or administrative authority. HSPPA is subject to the control of the Greek Parliament in accordance with article 138A of the Standing Orders of the Hellenic Parliament.

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<sup>64</sup> The Ombudsman is assisted by Deputy Ombudsmen who are responsible for the respective Departments (Human Rights, Social Protection, Health and Welfare, Quality of Life, State-Citizen Relations, Children's Rights and Equal Treatment).

<sup>65</sup> Law 3094/2003, art.3, par. 3.

<sup>66</sup> Law 3094/2003, art.3, par. 1.

<sup>67</sup> A synthesis of the Ombudsman’s experience regarding access to documents and administrative transparency in various policy areas was presented at the One-Day Conference of 23 of February 2009 (see Spanou, 2010).

<sup>68</sup> The Hellenic Data Protection Authority (HDP) is an independent public authority under Article 9A of the Constitution.

<sup>69</sup> Law 4013/2011, art. 1.

**Transparency policy in Greece: From citizen empowerment to anticorruption and open data***Supreme Council for Civil Personnel Selection (ASEP)*

The Supreme Council for Civil Personnel Selection (ASEP) was established in 1994<sup>70</sup> as an independent authority and its role was constitutionally empowered in 2001.<sup>71</sup> ASEP is responsible for promoting and safeguarding transparency, publicity, impartiality, objectivity and meritocracy in personnel recruitment and selection processes in the public sector, including the selection procedures of the top-management positions.<sup>72</sup>

*Internal Audit Units*

Finally, transparency is monitored by internal audit mechanisms. Internal audit provides feedback on the practices and activities of government management and promotes “*the overall effectiveness and efficiency of government operations and the transparency of decision making*” (OECD, 2018b: 13).

Internal audit was originally introduced in 2006<sup>73</sup> with the establishment of Internal Audit Units in all Ministries and Regions, as well as in supervised legal entities (as determined by law 3492), when their budget exceeded 3 million euros. Initially, their competences were mostly of a fiscal-economic nature and were until then exercised by the Financial Inspectorate of the Ministry of Economy and Finance or the General Directorate for Financial Controls, also including the improvement of management and control systems and of the efficiency of the procedures. Under the Economic Adjustment Programmes (2010-2018) and as part of administrative reorganization policies (i.e., the drafting of new organigrammes), internal audit units were (re-)established and strengthened, taking on broader responsibilities. In 2019, law 4622<sup>74</sup> confirmed this policy, providing for the establishment of internal audit units in all Ministries.

More recently, a framework legislation<sup>75</sup> set out detailed rules and horizontal standards for the internal audit procedures and structures in public administration. According to the explanatory report of the law, internal audit aims at strengthening good governance and promoting transparency and accountability in the activity of government bodies and public administration.<sup>76</sup> The internal audit system monitors the efficiency and effectiveness of their operational functions, the reliability of their financial and other reports and their compliance with the laws, regulations and policies governing its operation.<sup>77</sup>

Along with the internal audit system and units, the recent law 4795/2021 establishes *Integrity Advisors* to public administration and an *Audit Committee*. The Integrity Advisor has supporting, information and advisory competences.<sup>78</sup> Among others, s/he participates in the formulation of internal policies and the

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<sup>70</sup> Law 2190/1994 (see also recent Laws 4590/2019 and 4765/2021).

<sup>71</sup> Article 101A of Constitution (see also Law 3051/2002).

<sup>72</sup> Law 4369/2016.

<sup>73</sup> Law 3492, art. 12 and art. 4.

<sup>74</sup> Art. 39.

<sup>75</sup> Law 4795/2021.

<sup>76</sup> pp. 130-131.

<sup>77</sup> Law 4795/2021, art. 4.

<sup>78</sup> Law 4795/2021, art. 24.



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development of tools to enhance integrity and transparency, such as codes of ethics and conduct, management regulations, conflict of interest, fraud, and corruption protocols. The Audit Committee guarantees the independence of the Internal Audit Unit, monitors its work, ensures the quality of its work and makes sure that its recommendations are taken into account by the head of the body.<sup>79</sup>

## Parliamentary institutions

### *Special Standing Committee on Institutions and Transparency*

At the Parliamentary level, a Special Standing Committee on Institutions and Transparency (one of the eight Special Standing Committees of the Hellenic Parliament) exercises parliamentary oversight and control on the Independent Administrative Authorities, including the NTA, the Greek Ombudsman and the HSPPA, as described above, as well as on mass media. In addition, it elaborates proposals that aim to contribute to the transparency of public life.<sup>80</sup>

According to article 138A of the Standing Orders of the Hellenic Parliament, every independent authority submits to the Speaker of the Parliament an annual activity report. Moreover, independent authorities may submit special reports on matters relative to their competences and various parliamentary committees may order special reports from independent authorities to inform Parliament on matters of general interest. The findings of the discussions between the parliamentary committees and the independent authorities are submitted to the Speaker of the Parliament, who transmits these findings to the competent Minister and to the relevant authority. The Standing Committee on Institutions and Transparency (or other parliamentary committees according to their scope of competence) may also organize hearings with independent authorities.<sup>81</sup>

The key actors involved in the planning and implementation of transparency policy as well as their main competences in relation to the issue of transparency are summarized in Table 5.

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<sup>79</sup> Law 4795/2021, art. 8.

<sup>80</sup> <https://www.hellenicparliament.gr/>.

<sup>81</sup> Art. 138A and 41 A of the Standing Orders of the Hellenic Parliament.

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*Table 5. Transparency policy – Key actors*

	Body / Authority	Type	Main Competences
Government / administrative bodies	Ministry of Digital-Governance (Division of Open Government and Transparency)	Central ministerial structure	Design, implementation, monitoring of open government and open data policies and applications
	National Transparency Authority	Independent Authority without legal personality (established by Law)	Planning, co-ordination, implementation and monitoring of transparency policy
	National Coordinating Body for Audit and Accountability	Body operating under the auspices of NTA, comprising of public authorities, bodies and services involved in the fight against fraud and corruption	Coordination of the fight against corruption
	Anti-Fraud Coordination Service (NTA in collaboration with the financial crime prosecution body)	Independent Authority without legal personality (established by Law) in collaboration with the financial crime prosecution body	Effective cooperation and exchange of information with the European Anti-Fraud Office (OLAF)
	The Greek Ombudsman	Independent Authority without legal personality (Constitutionally established)	Mediation between citizens and public administration, protecting citizens' rights and freedoms, combating maladministration and ensuring legality
	Hellenic Single Public Procurement Authority	Independent Authority without legal personality (established by Law)	Transparency of public procurement procedures and contracts
	Supreme Council for Civil Personnel Selection	Independent Authority without legal personality (Constitutionally established)	Transparency and meritocracy in the recruitment and selection procedures of civil servants.
	Internal Audit Units	Ministerial Units (Directorate level)	Good governance - promotion of transparency and accountability in government and public administration Efficiency and effectiveness of operational functions, reliability of financial reports, compliance with the laws, etc.
Parliamentary institutions	Special Standing Committee on Institutions and Transparency	Special Parliamentary Committee	Parliamentary control on Independent Administrative Authorities and on mass media Elaboration of proposals aiming at contributing to the transparency of public life

Source: Authors' own elaboration

**Transparency policy in Greece: From citizen empowerment to anticorruption and open data****External actors, technical support, and advisory bodies**

During the 2010s, the context as well as the means and goals of transparency policy in Greece have been strongly affected by external pressure and, to a certain extent, were the result of external guidelines, recommendations, and advisory support. For instance, the National Anti-Corruption Plan (NACAP), which is the key plan for anti-corruption policy (see section 4.2) is linked to obligations that derive from the Economic Adjustment Programmes of Greece (OECD, 2018a: 5) and ensures the continuation of the European Stability Mechanism reforms (NTA, 2020: 1). Along with the EU requirements, various advisory bodies and supranational organizations were also involved in the formulation, funding, and technical support of transparency policy, as described below.

*The Greece-OECD Technical Support Project on Anti-Corruption*

In 2016, the OECD, Greece and the European Commission initiated a technical support project, co-funded by the EU and national funds, with the aim of increasing integrity and reduce corruption in Greece, especially regarding the implementation of the NACAP, which was completed in January 2018 (duration: 18 months). As regards the goals of strengthening public sector integrity in Greece, in line with the objectives of NACAP, the project included eight measures in key-areas, as presented in Table 6. The stakeholders of this project were the General Secretariat Against Corruption (GSAC) within the (then) Ministry of Justice, Transparency and Human Rights, the Structural Reform Support Service (SRSS) of the European Commission<sup>82</sup> and the Organisation for Economic Co-operation and Development (OECD).

In the framework of the technical support project, numerous reports, manuals, guidelines, training programmes, action plans, assessment reports, studies and proposals were published, along with the organization of forums, workshops, consultations, and other events.<sup>83</sup>

*Table 6. Key measures / areas of the Greece-OECD Technical Support Project on Anti-Corruption*

<b>Strengthening public sector integrity in Greece</b>
Modernisation of internal and external control mechanisms
Advanced tailor-made anti-corruption approaches for high-risk policy areas
Strengthened institutional capacity of the General Secretariat against Corruption
Enhancing anti-corruption awareness across relevant stakeholders in the field of corruption prevention and public integrity
Strengthened whistle-blower mechanisms
Corruption complaints management
Improved integrity safeguard through enhanced Asset Declaration, Conflict of Interest and Political Financing systems
Integrity mainstreamed in the educational system

Source: Greece-OECD project: Technical support on anti-corruption

(<https://www.oecd.org/governance/ethics/public-sector-integrity-greece.htm>)

<sup>82</sup> Currently Directorate-General for Structural Reform Support (DG Reform).

<sup>83</sup> See <https://www.oecd.org/governance/ethics/public-sector-integrity-greece.htm>.

**Transparency policy in Greece: From citizen empowerment to anticorruption and open data***GRECO recommendations*

Greece participates in the Group of States against Corruption (GRECO) and the Greek government has committed to implement all recommendations made by GRECO by mid-2021 (GRECO, 2019). However, due to the pandemic, 12 out of the 23 recommendations have been implemented so far and their full implementation is estimated later than expected (European Commission, 2021a: 35-36).

*Grants and partnerships*

The programme “Good Governance, Accountable Institutions, Transparency” is funded by the European Economic Area (EEA) grants and aims at enhancing public administration’s integrity, transparency, accountability, and effectiveness. The Greek programme was approved on December 2020 with a total amount of €7,000,000 and is supported by EEA grants and funds of the Public Investment Program of Greece.<sup>84</sup> The operator of the programme is the Management & Implementation Authority for Information Communication Technologies in the Ministry of Digital Governance.

As regards open government policies and initiatives, since 2011 Greece participates in the Open Government Partnership (OGP), which is an international multi-stakeholder initiative. OGP aims to secure governments’ commitments to promote transparency, empower citizens, fight corruption, and use new technologies to strengthen governance (IRM, 2018: 12).

*Technical expertise*

The technical assistance project for Administrative Reform in Greece, provided by *Expertise France* in cooperation with the EU Structural Reform Support Service – DG-Reform, supported the implementation of NACAP’s actions that aimed at reinforcing the internal audit system in public administration (NTA, 2020: 5). In addition, under the “Structural Reform Support Programme IV” (SRSP IV), there is currently underway an initiative which will support the design of an Annual Audit Plan using methodology and risk analysis tools (Risk Based Audit Plan) and the development of an Integrated Behavior Insight Framework (Behavior Insight Framework) (NTA, 2021a: 49-51).

Regarding public procurement procedures, the role of the Task Force for Greece (TFGR) in the development of the procurement platforms that improved transparency and accountability was also important (European Commission, 2016: 96).

**Non-governmental organizations**

Along with government actors, several NGOs are active in the area of transparency policy, for instance, Transparency International-Greece, “Budget Transparency” research group, Open Knowledge Greece, Gov4All, Citizen’s Movement for an Open Society, Science for you (SciFY), Hellenic Open Knowledge

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<sup>84</sup> Ministerial Decision 124428/2020 (Government Gazette B’ 5355/07.12.2020).

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Foundation - OK Greece, Impact Hub Athens, Open Technologies Organization (EEL/LAC), Reporters United, Solidarity Now, Vouli-watch and others. These actors provide information, monitor government's actions, issue reports, and make suggestions on transparency issues.<sup>85</sup> However, their interaction with the official government institutions is not regular but mostly of an ad hoc nature and refers for instance to collaboration for organizing information events, workshops, awareness-raising programmes, etc.

*Transparency International Greece*

Transparency International Greece was established in 1996 (see section 2.2) and is the local brunch of Transparency International in Greece. Transparency International is a global independent, non-governmental, not-for-profit movement aiming at fighting corruption and promote transparency, accountability, and integrity in all areas of public life. Transparency International Greece's main objectives include providing information and raising citizens' awareness towards the dangers of corruption, as well as the promotion of systemic changes with a view to enhancing transparency in the functioning of society.

*Research institutions*

Certain initiatives have been developed by research institutions that provide scientific support and information relevant to transparency issues. For instance, the Research Institute for Transparency, Corruption and Financial Crime" (RITCFC) at the Law School of Aristotle University of Thessaloniki aims at promoting transparency and enhancing awareness towards corruption and financial crime, based on the rule of law.

Another initiative that focuses particularly on transparency issues with reference to the state budget is the "Budget Transparency" research group. "Budget Transparency" is a team of post-graduate university students that issue the "Citizens' Budget" on an annual basis (2020 and 2021). The "Citizens' Budget" project facilitates citizens' accessibility and understanding of the budget and aims at improving budget transparency, enabling public debate on Government fiscal priorities, and controlling Government accountability as regards the commitments included in the State Budget.

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<sup>85</sup> Such an example is the role of "independent monitor" played by Transparency International-Greece in the context of the project "*Integrity Pacts-civil control mechanisms for safeguarding EU funds*", which is funded by the European Commission. See [http://integritypact.gr/wp-content/uploads/2020/04/1st\\_Monitoring\\_Report\\_IntegrityPact\\_ENG\\_FINAL.pdf](http://integritypact.gr/wp-content/uploads/2020/04/1st_Monitoring_Report_IntegrityPact_ENG_FINAL.pdf)

## *4.2 Implementation plans and tools*

### The National Anti-Corruption Action Plan

In the past years, Greece has thoroughly revised its anti-corruption legal framework. Since 2013 a comprehensive anti-corruption strategic framework has been developed for the planning and monitoring of the efforts aiming at preventing and combating corruption, namely the National Anti-Corruption Action Plan (NACAP) (European Commission, 2020c: 5-6).

NACAP provides a single framework for the planning and monitoring of the efforts made for preventing and combating corruption and is the national implementation tool of the priorities set out by the European Semester and as well as of the recommendations of the international organizations (NTA, 2020: 1).

The first National Strategy against Corruption was presented for the first time in March 2013. The plan was entitled “Transparency – A National Anti-Corruption Action Plan” and included 112 actions which were linked to 47 objectives connected to eleven 11 pillars (sectors of interventions) (GSAC, 2018). The Transparency Plan was initially launched in January 2014 and took the form of a National Action Plan to Combat Corruption, which is primarily a strategy-oriented paper.

The NACAP aims to (GSAC, 2018):

- promote transparency, integrity, good governance,
- contribute to the reduction of corruption,
- strengthen integrity,
- increase citizen’s trust in public institutions,
- promote zero tolerance mind-set to corruption,
- strengthen governance institutions in the fight against corruption.

Since 2013, the Anti-Corruption plan was revised and updated twice, in 2015 and in 2018. Currently the NACAP covers the period from July 2018 to mid-2021 and consists of four parts: (i) sectoral prevention of corruption, (ii) public integrity across administration and judiciary system, (iii) strengthening cooperation, coordination and collaboration across the public sector, and (iv) education and raising awareness. Their general strategy objectives are summarized in Table 7. In the end of 2020, the NTA has launched the process of (re)formulating NACAP for the period 2022-2025 (NTA, 2021: 123).

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Table 7. General Strategy Objectives of the NACAP

<b>PART 1: SECTORAL PREVENTION OF CORRUPTION</b>	
Reducing Corruption risks in specific Public Sectors	Public finances
	Specific Sectoral Strategy: Public Procurement
	Specific Sectoral Strategy: In Tax administration & customs
	Specific Sectoral Strategy: In Health
	Specific Sectoral Strategy: In Defence
	Special anti-corruption measures for sports / Strengthen transparency and integrity of sport society and public trust
Reducing Corruption risks in the private sector	Increase Transparency in the private sector, to ensure a safe environment for building sustainable and inclusive growth
Reducing Corruption risks in the political sphere	Enhancing Transparency in the Political Sector
Reducing Corruption risks in local government	Specific Sectoral Strategy: Local Government
<b>PART 2: PUBLIC INTEGRITY ACROSS ADMINISTRATION AND JUDICIARY SYSTEM</b>	
	Advancing the integrity in the public sector and increasing public trust
	Enhancing the integrity and efficiency of the judiciary system
<b>PART 3: STRENGTHENING COOPERATION, COORDINATION AND COLLABORATION ACROSS THE PUBLIC SECTOR</b>	
	Improvement of the inter – institutional cooperation
<b>PART 4: EDUCATION AND RAISING AWARENESS</b>	
	Raising Public Awareness

Source: National Anti-Corruption Plan 2018-2021

Along with the NACAP, sectoral anti-corruption plans have been developed between the NTA and line-Ministries, for instance in the health and public procurement sectors (European Commission, 2020a: 23, 95), while others are currently being processed. IAPR has also developed a plan entitled Anti-Corruption Strategy (2019-2021), which includes transparency issues.

### National Action Plan on Open Government

The National Action Plan on Open Government (NAPOG) is a key tool for monitoring and coordinating the implementation of the commitments of each Ministry as regards open government, open data and participatory policies, programmes and actions, as well as commitments further promoting open access and the re-use of documents, information and public sector data (Ministry of Administrative Reconstruction, 2019). NAPOG also aims at improving public administration and strengthening accountability for service delivery, via the commitment of public authorities to publish new information regarding government structures, identify mechanisms for public dispute resolution and monitor tools for open government (IRM, 2018: 15). Greece submitted to the OGP the first national Action Plan for Open Government in April 2014 (Ministry of Administrative Reform and E-Government, 2014: 4). The commitments and objectives of public bodies undertaken in the current programme are summarized in Table 8.

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*Table 8. Open access to data: Public bodies' commitments and objectives (NAPOG)*

Public bodies' commitments on Open access to data	Objectives
Ministry of Education, Research and Religious Affairs (Ministry of Education and Religious Affairs)	<ul style="list-style-type: none"> <li>Web services for data mining (API)</li> <li>Integration of new datasets</li> <li>Mobilization of entities of the Ministry of Education, Research and Religious Affairs for data publication</li> <li>Improvement of the quality of datasets</li> <li>Open data release decisions</li> </ul>
Ministry of Rural Development and Food (Ministry of Agricultural Development and Food)	<ul style="list-style-type: none"> <li>Anonymization and creation of new datasets</li> <li>Integration of new datasets</li> <li>Mobilization of entities of the Ministry of Rural Development and Food for data publication</li> <li>Improvement of the quality of datasets</li> <li>Open data release decisions</li> <li>Upgrading of digital applications and provision of additional datasets</li> </ul>
Ministry of Immigration Policy (Ministry of Migration and Asylum)	<ul style="list-style-type: none"> <li>Integration of new datasets</li> <li>Open data release decisions</li> </ul>
Ministry of National Defence	<ul style="list-style-type: none"> <li>Anonymization and creation of new datasets</li> <li>Integration of new datasets</li> <li>Mobilisation of entities of the Ministry of National Defence for data publication</li> <li>Improvement of the quality of datasets</li> <li>Open data release decisions</li> </ul>
Ministry of the Interior	<ul style="list-style-type: none"> <li>Anonymization and creation of new datasets</li> <li>Integration of new datasets</li> <li>Mobilisation of entities of the Ministry of the Interior for data publication</li> <li>Improvement of the quality of datasets</li> <li>Open data release decisions</li> <li>Upgrading of digital applications and provision of additional datasets</li> </ul>
Ministry of Administrative Reconstruction (currently Ministry of the Interior)	<ul style="list-style-type: none"> <li>Creation of a new open data site with advanced functionalities, screening, scoring and communication mechanisms with users</li> <li>Integration of new datasets</li> <li>Mobilisation of entities of the Ministry of Administrative Reconstruction for data publication</li> <li>Improvement of the quality of datasets</li> <li>Open data release decisions</li> <li>Upgrading of digital applications and provision of additional datasets</li> <li>Creation of new datasets, statistics and reports</li> <li>Further expansion of the open data ecosystem by involving civil society</li> <li>Integration of information of previous phases of the civil servant mobility system</li> </ul>
Ministry of Economy and Development (Ministry of Development and Investments)	<ul style="list-style-type: none"> <li>Integration of new datasets</li> <li>Mobilisation of entities of the Ministry of Economy and Development for data publication</li> <li>Improvement of the quality of datasets</li> <li>Open data release decisions</li> <li>Upgrading of digital applications and provision of additional datasets</li> <li>Datasets, applications and visualisations of data of procurement, contracts, public works and services</li> </ul>



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National Centre for Public Administration and Local Government	Study on the Implementation of the Digital Repository Implementation of a platform of a Digital Repository for research and studies of the public sector Study on optimisation of the online consultation process Integration of new datasets
Ministry of Justice, Transparency and Human Rights (Ministry of Justice)	Anonymization and creation of new datasets Integration of new datasets Mobilisation of entities of the Ministry of Justice, Transparency and Human Rights for data publication Improvement of the quality of datasets Open data release decisions Upgrading of digital applications and provision of additional datasets
Ministry of Environment and Energy	A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Environment and Energy and will be made available for re-use in order to contribute to the development and participation of citizens. Investigation of the possibility of harvesting the data of the Ministry of Environment and Energy into data.gov.gr Integration of new datasets and web services Improvement of the quality of datasets Open data release decisions
Ministry of Culture and Sports	Open data release decisions Updating of the datasets Adaptation of datasets in accordance with the new structure of the Ministry's services Grouping and homogenisation of the datasets of the Ministry

Source: IRM, 2021

## Open Data Portals and Platforms

### *OpenGov.gr*

The Greek Open Government Initiative (<http://www.opengov.gr/>) was launched in 2009 with the aim of serving the principles of transparency, deliberation, collaboration, and accountability. The Initiative includes three key areas, namely (i) open calls for the recruitment of top executive positions and other posts in public administration, (ii) electronic deliberation (draft legislation is posted in a platform prior to their submission to the parliament, where citizens and organizations can post comments, suggestions and / or criticisms), and (iii) Labs OpenGov, which aims at bringing together ideas and proposals from citizens, the public sector and the private sector.

### *'Transparency' portal – Diavgeia*

The Transparency Portal (Diavgeia/"Cl@rity project" <https://diavgeia.gov.gr/>) was established in 2010 with the aim of enhancing and safeguarding transparency of government actions. The "Transparency

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programme”<sup>86</sup> also aims at fighting corruption, monitoring legality and good administration, reinforcing citizens’ constitutional rights, including their participation in the Information Society, modernizing existing mechanisms of administrative acts and decisions’ publication and ensure that the format of all administrative acts is easy to access, navigate and comprehend.<sup>87</sup>

All public authorities are required to publish their acts and decisions on the Portal, as a prerequisite of their validity. In addition, according to law 4305/2014<sup>88</sup> all Ministries, Legal Persons of Public Law (NPDD), Local Entities and their NPDD are obliged to publish data on the execution of their budget on their website and the Diavgeia platform, describing in detail their revenues and expenditures.

According to the data published in the Diavgeia website, until April 2021, 43.8 million acts and decisions have been published by 5,031 bodies and entities of the Greek public sector.

*UltraCl@rity portal – Yperdiavgeia*

<https://yperdiavgeia.gr/> (“UltraClarity”) is a portal which operates as a search engine for Greek open public data with the aim of enhancing transparency. The portal contains all Greek open Government documents, namely (i) all documents published through the Diavgeia platform, (ii) Greek Legislation published through the National Printing Service, (iii) all tenders, and procurements published through the Central Electronic Registry for Public Contracts (CERPC), and (iv) all Greek Parliament proceedings published through the official site of the Hellenic Parliament.

*Data.gov.gr*

Data.gov.gr (<https://www.data.gov.gr/>) is the central directory of public data that provides access to databases of Greek government agencies, bodies, and entities. The purpose of data.gov.gr is to increase access to high-value, machine readable datasets by providing integrated services of cataloging, indexing, storage, search and availability of public sector data and information, as well as online services to citizens and third-party information systems. The previous version of Data.gov.gr included 340 entities and 17 categories. In its current form, the available topics and datasets are presented in Table 9.

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<sup>86</sup> Law 3861/2010.

<sup>87</sup> <https://diavgeia.gov.gr/>.

<sup>88</sup> Art. 15.

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Table 9. Topics and datasets of Data.gov.gr

Topics	Datasets
Business and Economy	Number of travel agencies Number of registered auditors and auditing firms Number of energy inspectors Number of registered realtors Casino Tickets Number of Accountants
Crime and Justice	Traffic Accidents Traffic Violations Rescue Operations Crime Statistics Financial Crimes Number of Lawyers Number of Law Firms
Education	University Teaching Staff Students by School Atlas Internship System Statistics "Eudoxos" Requests & Deliveries
Environment	Energy System Load Renewable Energy Sources Protected area plots per local authority Energy Balance Cadastre plots per local authority Electricity consumption in Greece Urban Incidents List of Forest Fires
Health	COVID-19 vaccination statistics Inspections & Violations Number of Pharmacists Number of Pharmacies Number of Doctors Number of Dentists
Society	Unemployment Claims Electors by Age Electors by Region & Gender
Technology	Internet Traffic in Greece
Telecommunications	Telecommunications Indicators & Statistics
Transportation	Road Traffic for the Attica region OASA Daily Ridership Commercial Sailing Traffic and Routes

Source: data.gov.gr

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*GEODATA.gov.gr*

Geodata.gov.gr (<https://geodata.gov.gr/>) operates since 2010 and provides open geospatial data and services for Greece. Most of the participating organizations that publicize data are public organizations. Geodata.gov.gr serves, among others, as a national open data catalogue and is powered exclusively by open-source software.

*Table 10. Implementation tools: Open data portals*

Portal	Data and information provided
OpenGov.gr	<ul style="list-style-type: none"> <li>• Calls for the recruitment of public administration officials</li> <li>• Electronic deliberation (draft legislation)</li> <li>• Labs OpenGov</li> </ul>
diavgeia.gov.gr ("Cl@rity" portal)	<ul style="list-style-type: none"> <li>• Acts and decisions of public authorities</li> </ul>
yperdiavgeia.gr ("UltraCl@rity" portal)	<ul style="list-style-type: none"> <li>• Documents published on "diavgeia"</li> <li>• Greek Legislation published through the National Printing Service</li> <li>• Tenders and procurements published through the Central Electronic Registry for Public Contracts (CERPC)</li> <li>• Greek Parliament proceedings published through the official site of the Hellenic Parliament</li> </ul>
Data.gov.gr	<ul style="list-style-type: none"> <li>• Databases of Greek government agencies, bodies and entities</li> </ul>
GEODATA.gov.gr	<ul style="list-style-type: none"> <li>• Open geospatial data and services</li> </ul>

Source: Authors' own elaboration

### *Other platforms*

Along with the central portals for e-government and open data policy, additional sources and platforms exist at the central level as well as at the decentralized and local one. For instance, within the "Diavgeia" portal operates the Registry for Subsidized Bodies (<https://mef.diavgeia.gov.gr/>) in which are published all entities that are subsidized in any way by General Government, over the amount of three thousand (3,000) euros in total, annually (name, date and amounts).

As regards independent authorities, the HSPPA, in line with the European Directive 2019/1937, has adopted a secure anonymous whistleblowing platform (<https://whistle2eaadhsy.disclosers.eu/#/>).

At the municipal level, certain local entities have introduced initiatives aiming at strengthening the openness and transparency of their activities. For instance, the Municipality of Athens provides data, information and services via <https://www.cityofathens.gr/khe>. The Municipality of Thessaloniki operates the open data platform [opendata.thessaloniki.gr](https://opendata.thessaloniki.gr/) (<https://opendata.thessaloniki.gr/>), where several datasets are published providing information on its actions and programmes. The Municipality of Gortinia also provides open data via <http://opendatagortynia.gr/>, which includes 37 datasets.

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## Public procurement platforms

A central portal, entitled “Prometheus”, contains links to all the key platforms, as well as training and guidance materials, legal materials, and statistical reports. The key e-procurement platform is the National Electronic Public Procurement System (ESIDIS), providing e-notification, e-access, and e-submission, while the Central Electronic Registry for Public Procurement (CERPP) serves as a transparency register (European Commission, 2016: 94). As regards the post-awarding procedures, electronic tools have been established, namely e-auction, e-catalogue, e-ordering, e-payment and e-archiving, which have contributed to a higher level of transparency regarding contracts and payments (European Commission, 2016: 94-96).

## Audit procedures, methodologies, and tools

The NTA uses various innovative methodological tools, such as integrated management systems, manuals, auditing standards, risk management tools and behavioral analyses, as depicted in Figure 5.

Figure 6. NTA’s methodological tools



Source: NTA’s website

Within its central role in transparency policy, the NTA publishes and reproduces Manuals and Codes that provide guidance and technical advice to public administration in the fight against corruption, internal audit and ethics, for instance the Corruption and Fraud Risk Management Guide, the Code of Conduct for Internal Auditors, Professional Standards for the Audit Work of NTA, the Code of Professional Ethics for Inspectors - Auditors of the NTA, etc. Regarding the risk of fraud and corruption in relation to transparency issues, a common method of extracting information is conducting interviews with the heads and employees of public institutions, as presented in Table 11 (NTA, 2021b: 61).

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Table 11. Interviews - questionnaire focused on transparency in public entities

1.	Does the public entity have a communication policy for the publicity of its action?
2.	Are the following provided on the institution's website?
	<ul style="list-style-type: none"> <li>• Organizational structure and communication officers</li> <li>• Policies and policy documents</li> <li>• Laws and regulations</li> <li>• Procedures for serving citizens and businesses</li> </ul>

Source: NTA, 2021b: 61 (Annex 2)

Finally, concerning internal audit, law 4795<sup>89</sup> provides that internal auditors should consider and use generally accepted international internal auditing standards and best practices, as developed by bodies such as the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the Institute of Internal Auditors (IIA).

### 4.3 Co-ordination mechanisms and tools

As the key institution in the field of transparency policy, the NTA is responsible for the overall coordination, planning, supervision, and evaluation of the activity of all control bodies and units, as well as of the Integrity Advisors (Integrity Advisers Network).<sup>90</sup> Its coordination mission also embraces the implementation of the NACAP (European Commission, 2020c: 6), which is a key tool for the cooperation among competent authorities in the fight against corruption (NTA, 2020: 1).

Regarding more specifically the Internal Audit Units, coordination, monitoring, and evaluation of their operation has been assigned to<sup>91</sup>:

- The *National Transparency Authority*, as regards the institutional, organizational and operational framework for the National Internal Audit System, internal control function and the risk management function; the standards, methodologies and internal control tools; the coordination and support of the operation and control action of the Internal Audit Units; the monitoring and evaluation of the Internal Audit Units and the submission of proposals to address problems identified during the process; the information of the reports and findings of the Internal Audit Units and the implementation of their proposals,
- The *Ministry of Finance*, as regards the adequacy of the Internal Audit System in relation to the principles of sound financial management,
- The *Court of Auditors*, as regards the monitoring and evaluation of the effectiveness and adequacy of Internal Control Units in accordance with the relevant legislative.

<sup>89</sup> Art. 21.

<sup>90</sup> Law 4795 /2021, art. 30.

<sup>91</sup> Law 4795/2021, art. 22.

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The National Coordinating Body for Audit and Accountability (NCBAA), as above described (section 4.1), is responsible for the coordination of the fight against corruption. To this end, NCBAA aims particularly at (i) identifying synergies and possible overlaps among audit actions and anti-corruption initiatives, (ii) planning and undertaking joint actions, (ii) systematic dialogue and exchange of views between all competent authorities, bodies and services in controlling public organizations and in the fight against corruption, and (iv) disseminating good practice and innovative methodological approaches and tools through the development of common standards and tools.<sup>92</sup>

*Table 12. National Coordinating Body for Audit and Accountability: Key goals*

NCBAA goals (co-ordination)	
i	Identifying synergies and possible overlaps among audit actions and anti-corruption initiatives
ii	Planning and undertaking joint actions
iii	Systematic dialogue and exchange of views between all competent authorities, bodies and services
iv	Disseminating good practice and innovative methodological approaches and tools through the development of common standards and tools

Source: Law 4622/2019, art. 103, par. 2

## 5. CONTROL AND EVALUATION OF TRANSPARENCY POLICY

### 5.1 Transparency policy monitoring

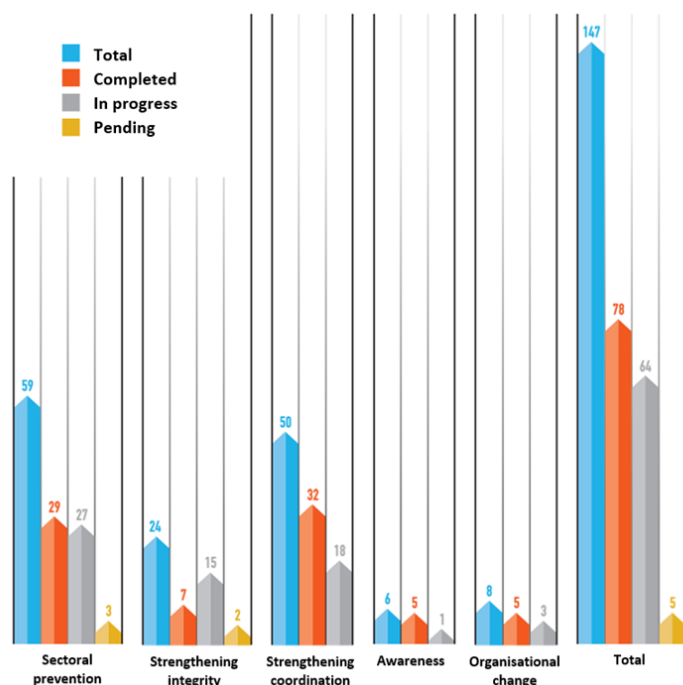
The key tool for monitoring the overall implementation of transparency policy is the NACAP Implementation Reports that are issued by the NTA on a bi-annual basis and assess the progress of anti-corruption policy implementation. Actions are categorized depending on their progress in line with horizontal criteria, namely sectoral prevention, strengthening integrity, strengthening coordination and awareness (Figure 7).

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<sup>92</sup> Law 4622/2019, art. 103, par. 2.

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Figure 7. Implementation of NACAP 2018-2021



Source: NTA, 2021a: 24, 120

The implementation of the sectoral strategy and plans for the fight against corruption and the enhancement of transparency is monitored by the competent bodies, via standard and special reports (NTA, 2020: 3-4):

- In public procurement, the sectoral anti-corruption strategy is monitored via the annual reports of HSPPA. This authority also adopts e-procurement and online reporting tools, which aim at increasing efficiency, openness, and ease of oversight of the procurement system for combating corruption and enhancing transparency (European Commission, 2016: 91).
- In tax and customs administration, the sectoral strategy is under way, while the Independent Authority for Public Revenues (IAPR) has published a respective strategy for the 2019-2021 period and progress is being monitored via IAPR's annual reports.
- With reference to open data, law 4727/2020<sup>93</sup> provides that for the availability and re-use of open data the Minister of Digital Governance within the first two months of each calendar year submits to the Speaker of Parliament an annual report on the open distribution and re-use of documents, which prior to its submission, shall be put to public consultation for a period of at least fifteen days. This report is posted on the website of the Ministry of Digital Governance and the single digital portal of public administration (gov.gr) and is discussed in the Hellenic Parliament.

<sup>93</sup> Art. 73.



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The progress of the National Action Plan on Open Government (NAPOG) is monitored via the reports of the Open Government Partnership Independent Reporting Mechanism (OGP-IRM) that includes a set of commitments for each public body. The latter are responsible for the release of data from their domain of responsibility, with the aim of addressing transparency challenges, access to information issues as well as (in some cases) budget transparency (IRM, 2021: 21). The implementation and impact of these commitments are monitored and assessed via regular reports.

The implementation of the programme “Good Governance, Accountable Institutions, Transparency” (GGAIT), is monitored through reports (financial reports, annual programme reports and a final programme report, art. 2.7) submitted by the programme operator, as required by the programme agreement under the EEA Financial Mechanism 2014-2021.<sup>94</sup> In addition, surveys are to be conducted for the measurement of the effectiveness of the implemented anti-corruption policies (NACAP Action: 14.2.2) (NTA, 2020: 8).

The key tools for monitoring transparency policy are summarized in Table 13.

Table 13. Key tools for monitoring transparency policy

Plans / policies / programmes	Competent body	Monitoring tools
NACAP	NTA	NACAP Implementation Reports (bi-annual)
Sectoral anti-corruption plans	Sectoral authorities (HSPPA, IAPR)	Annual Reports, Special Reports, Strategic Plans
Open distribution and re-use of documents	Minister of Digital Governance	Annual Report
Action Plan on Open Government	OGP Independent Reporting Mechanism (IRM)	Progress Reports (mid- and end-term reports)
GGAIT programme	Programme Operator	Financial reports, annual programme reports, final programme report (implementation) Surveys (effectiveness of implemented policies)

Source: Authors' own elaboration

## 5.2 Evaluation Indicators

Until 2018, no formal evaluation of the implementation of the Action Plan had been carried out on the basis of specific and measurable indicators. Furthermore, available indicators, as presented in Table 14 for the 2017 Action Plan, do not correspond directly to the actions included in the “Transparency” (National Anti-Corruption Action Plan) or in the subsequent Action Plans (OECD, 2018a: 13-15). Currently, the NTA is in the process of specifying the objectives and the corresponding indicators for the next evaluations.

<sup>94</sup> Ministerial Decision 124428/2020 - Government Gazette B' 5355/07.12.2020.

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*Table 14. Efficiency Evaluation Indicators for TRANSPARENCY Objectives*

Strategic Objectives	Actions / Evaluation Indicators
Efficient political leadership in the fight against corruption	<ul style="list-style-type: none"> <li>• Consistent political pledges and actions</li> <li>• Adoption of Codes of Conduct by the Parliament and the Government</li> <li>• Adoption of Codes of Conduct by all Local Authorities</li> <li>• Voting of anti-corruption statutes</li> <li>• Action taken by the Parliament based on the reports of the National Coordinator</li> <li>• Voting of law for the funding of politicians and parties</li> </ul>
Increased public demand for accountability and rejection of corruption	<ul style="list-style-type: none"> <li>• Alertness of society for political anti-corruption actions</li> <li>• Implementation of PPSSAC plans in all sectors of increased corruption</li> <li>• Joint actions with all anti-corruption non-governmental bodies</li> <li>• Comprehensive annual reports</li> </ul>
Efficient enforcement of anti-corruption measures	<ul style="list-style-type: none"> <li>• Voting of legislation</li> <li>• Operation of internal structures for controlling transparency in General Government bodies</li> <li>• Full compliance of Greece with international obligations within the period of “TRANSPARENCY”</li> <li>• Development of joint legal initiatives for mutual support with at least six other countries</li> <li>• Time required for reducing corruption cases by 50%</li> </ul>
Increased compliance with sound management regulations and increased accountability of public and private bodies	<ul style="list-style-type: none"> <li>• Reporting of anti-corruption cases in bodies, services and Local Authorities</li> <li>• Individual / sectoral anti-corruption actions</li> <li>• Identification of high-risk areas for corruption</li> <li>• Annual reports on integrity / accountability issues</li> <li>• Assessment of integrity of public bodies (National Integrity Survey)</li> <li>• Implementation of public sector reform</li> </ul>
Reinforced implementation of the “TRANSPARENCY” anticorruption plan	<ul style="list-style-type: none"> <li>• Systems for collecting information, installed and in operation</li> <li>• Strategic decisions relating to the coordination of the fight against corruption</li> <li>• Anti-corruption research programme, in operation</li> <li>• Detailed reports and work plans submitted for annual joint review</li> <li>• Activated mechanisms for the control and assessment of “TRANSPARENCY”</li> <li>• Joint policy on education and plan for the joint use of resources, in operation</li> <li>• Information and communications systems in operation</li> <li>• Resources allocation planning</li> </ul>

Source: OECD, 2018a: 14-15

Data on transparency policy is collected through various entities and institutions that are involved in the implementation of the NACAP and anti-corruption policies. The bodies providing the relevant qualitative and quantitative data are presented in Table 15.

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Table 15. Bodies from which data is collected (2018)

Data sources (Public bodies)	
1	Supreme Court's Public Prosecution Office
2	General Commission of the State
3	The Prosecutor's Office Against Corruption (Athens)*
4	The Prosecutor's Office Against Corruption (Thessaloniki)*
5	Court of first instance of Athens
6	Court of first instance of Thessaloniki
7	Court of first instance of Piraeus
8	Hellenic Financial Intelligence Unit (FIU)
9	The Greek Ombudsman
10	Independent Authority for Public Revenue - Internal Affairs Directorate
11	Customs Service
12	General Inspector of Public Administration**
13	Hellenic Police Internal Affairs Directorate
14	Hellenic Police, Financial Police Division
15	Cyber Crime Division of the Hellenic Police
16	The Inspectors-Controllers Body for Public Administration**
17	Special Secretariat of the Financial and Economic Crime Unit (SDOE)
18	Ministry of Finance/Internal Audit Unit
19	Health and Welfare Services Inspection Body**
20	Service for the control of health expenditure of social security funds, national organization of health care services (YPEDYFKA EOPYY)
21	Inspectors – Controllers Body for Public Works (SEDE)**
22	Internal Affairs Service of the Hellenic Ministry of Shipping and Island Policy

Source: OECD, 2018a: 17

\* Replaced by the Financial Crime Prosecutors (2020)

\*\* Abolished and merged in the NTA (2019)

### 5.3 Control reports and results

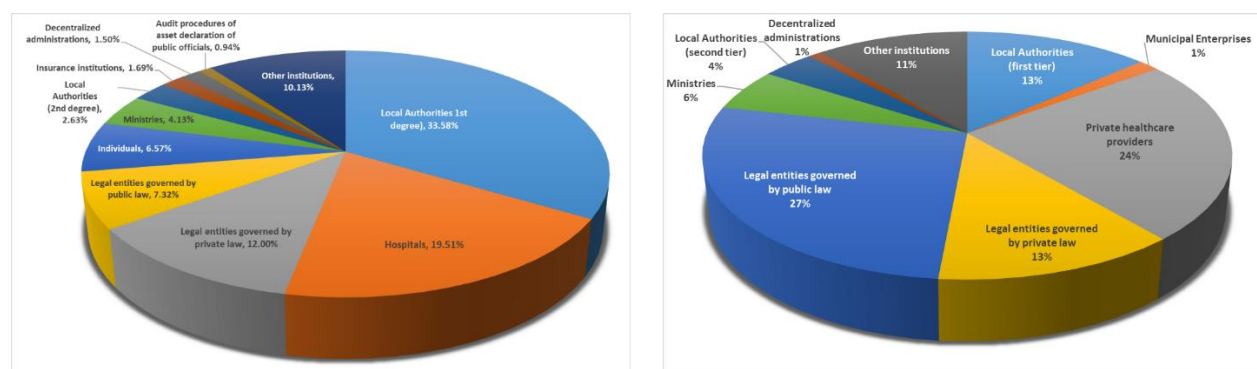
The results of the conducted controls are processed and published in the annual and / or special reports of the NTA. The received complaints refer to various public entities and institutions. Most of them concern first tier local government, hospitals, and legal entities of private law, while the complaints received for central administration (Ministries) are much fewer (Table 16). These findings reflect among others the distribution of competences and the volume of contacts between the citizens and various public services.

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*Table 16. Complaints received per entity (2019, 2020)*

% of received complains		Controlled entities
2019	2020	
33.58 %	13.38%	Local Authorities (first tier)
	1.53%	Municipal Enterprises
19.51 %		Hospitals
	23.90%	Private healthcare providers
12.00 %	12.68%	Legal entities governed by private law
7.32 %	27.15%	Legal entities governed by public law
6.57 %		Individuals
4.13 %	5.54%	Ministries
2.63 %	3.82%	Local Authorities (second tier)
1.69 %		Insurance institutions
1.50 %	0.96%	Decentralized administrations
0.94 %		Audit procedures of asset declaration of public officials
10.13 %	11.09%	Other institutions

Source: NTA, 2020: 17 and 2021: 68

In 2019, first tier local government covers the larger part (33.58%) of the conducted controls. Hospitals (19.51%) and legal entities of private law (12%) also have important shares, while other institutions follow with smaller part of total controls. In 2020, the largest parts of the conducted controls refer to legal entities governed by public law (27%) followed by private healthcare providers (13%), as presented in Figure 8.

*Figure 8. Controlled entities and individuals by NTA (2019, 2020)*


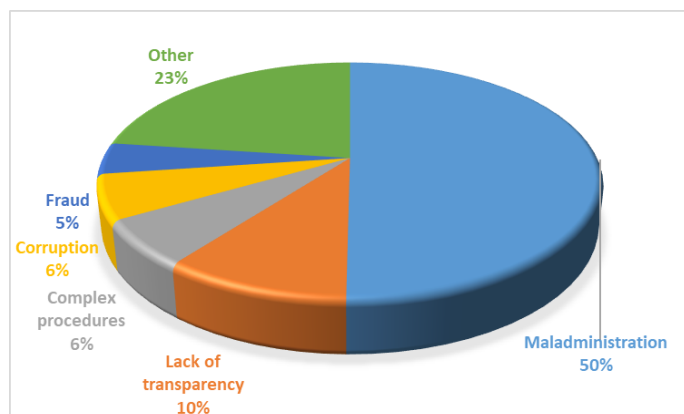
Source: Data based on NTA, 2020: 17 and 2021a: 68

Regarding the type of complaints submitted to the NTA, available data show that the 6.17% of received complains refer to cases of “lack of transparency”, while most complaints as well as the findings of the controls refer to cases of maladministration and non-compliance with procedures (NTA, 2020: 17-18). These trends are also confirmed by the 2020 Annual report, as depicted in Figure 9. For 2021, the findings

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of the conducted controls show that most cases refer to illegal actions, omission of required action and delays, while non-compliance with publicity rules accounts for a small percentage (0.74%) (NTA, 2021a: 69).

Figure 9. Complaints submitted to NTA, 2020



Source: NTA, 2021a: 64

#### 5.4 Implementation problems and recommendations

As described in section 5.1, the current implementation tools of transparency policy include the national action plans on Anti-Corruption and Open Government and several open data portals and platforms, where information is publicized. However, despite the increasing volume of the available data, information is not sufficiently organized, something that tends to limit its visibility and its use in practice. Further implementation problems have been detected in the area of access to information as regards the quality of information and the lack of monitoring and control mechanisms for ensuring that deadlines are met (European Commission, 2021c: 32). In addition, existing indicators for policy evaluation are not specific and measurable, while the results of the controls mostly refer to cases of maladministration and non-compliance with procedures and to a lesser extent to transparency issues.

While the NTA is acknowledged as having a good start (European Commission, 2020b: 77), several sectoral or procedural issues of transparency have been pointed out. Such a sectoral issue is transparency in public procurement where, according to a 2016 European Commission comparative study (European, 2016: 98), much needed to be done in the direction of mitigating the risk of corruption and maximizing transparency. Such an example was the incorporation of comprehensive and timely data collection and publication into the system of e-procurement, which could also provide a better oversight possibility to outside groups and the public. The recently adopted new national public procurement strategy for 2021-2025 includes certain measures towards the right direction, for instance the digitalisation of public procurement processes and the upgrade of relevant systems, the launch of new tools and e-services and the improvement of governance and control framework in public procurement (European Commission, 2021b: 57).

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The question of openness and participation in transparency policy decision-making appears problematic as well. The involvement of non-governmental stakeholders in the development of an effective open data strategy has been recommended by the OGP (IRM, 2021) and has been a constant request of the Greek NGOs that are active in the area of transparency.<sup>95</sup> As showed in the previous sections, there is no regular collaboration between the government and NGOs, while transparency mainly remains a top-down policy. In practice, existing initiatives involving non-governmental organizations in policy-making mainly refer to ad-hoc collaborations for information and awareness raising purposes and not to a regular and active participation of NGOs in the policy process.

Finally, an assessment of existing regulations is needed before proceeding to further amendments or changes. For instance, a comprehensive review of the legal framework for the fight against corruption of public officials is required before making the necessary amendments to the codes and sanctions for bribery of public officials, as recommended by GRECO, something that would enable Greece to fight corruption in a more effective way (European Commission 2020b: 20-21).

## 6. CONCLUSIONS

Transparency policy had a relatively early start in Greece. It initially emerged as a government initiative in the context of the democratization reforms of the 1980s. Though there was no explicit social demand, it responded to a broader claim for political change and participation that included the reversal of the authoritarian features of citizen-administration relations. However, the impact of these provisions often remained at a symbolic level and lacked an active involvement and mobilization of civil society. A critical role was played by the Directorate for citizen-administration relations in the (then) Ministry of the Presidency, which fed the political leadership of the time with specific proposals.

Further political initiatives built on the initial laws, but soon a new perspective came to be added in the 1990s and early 2000s. The new focus was on the development of inspection and control bodies, which were utterly absent until then. Open government and open data were later integrated as part of transparency policies though with a different focus, one emphasizing citizen empowerment and the other stressing the potential economic value of government collected (digital) data for the private sector. More recently, the economic crisis of the 2010s shifted attention to the fight against corruption. It is no coincidence that the National Transparency Authority constitutes an independent control mechanism with a special mission for preventing and fighting corruption. In that sense, the term “transparency” seems to have embraced a wide variety of concerns, objectives, procedures, and institutions. Currently, transparency policy is to a large extent dominated by (i) anticorruption and (ii) digital governance, rather than other aspects such as citizen empowerment and participation, and democratic accountability.

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<sup>95</sup> See for instance the Letter of 9 civil society organizations to the Minister of Digital Governance (April 14, 2021) (<https://www.transparency.gr/>).

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Like other policy domains and due to successive changes, fragmentation of the legislative framework, of the administrative infrastructure involved and partly of the electronic platforms, in the course of time became a constant feature of transparency policies. Fragmentation further resulted in a rather complex legislative, administrative, and digital landscape, which came under the scrutiny of the 2010-2018 adjustment programmes and the growing influence of expert international organizations during the past years. In this context, the dominant priority of fighting corruption led to successive initiatives for the coordination and finally merger of control mechanisms in 2019. In addition, under the ongoing programme for public sector digitalization, an effort is made to centralize and interconnect existing platforms.

Despite the legislative expansion of anti-corruption and open government policies, up to date no single framework legislation for transparency policy exists. Relevant provisions are included the Constitution of Greece and numerous laws, presidential decrees, and ministerial decisions, while constant changes and amendments of the regulatory framework hamper its continuity and coherence over time. However, it needs to be acknowledged that a significant effort is under way to establish a general coherent framework integrating and codifying preexisting regulations and setting the general principles, guidelines, and standards to follow.

At the policy-making level the picture is equally complex. The implementation of transparency policy implicates multiple actors across central government. Apart from the Ministry of Digital Governance, and the National Transparency Authority, other independent authorities, internal structures of the administrative apparatus, as well as external experts are involved in policy-making. Transparency policy is being monitored and evaluated via regular reports that assess the progress of the key policies, namely anti-corruption, and open government, along with sectoral strategies and plans. However, given the variety of the actors involved along with the implementation and monitoring tools, co-ordination issues may arise.

Beyond the institutional, legislative, and technical prerequisites, a full, effective, and inclusive transparency policy needs to take into account its role for democracy and accountability. This dimension needs to be brought back into the debate. Transparency is a horizontal requirement that concerns any policy sector. In contrast, as a result of the Economic Adjustment Programmes and the Post-Programme Enhanced Surveillance, transparency is often seen in the particular light of the economy and anticorruption. Its political significance for developing trust in government should not be lost in the multiplicity of its technical aspects.

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## Abbreviations

AFCOS: Hellenic Anti-Fraud Coordination Service

ASEP: Supreme Council for Civil Personnel Selection

CERPC: Central Electronic Registry for Public Contracts

CERPP: Central Electronic Registry for Public Procurement

COSO: Committee of Sponsoring Organisations of the Treadway Commission

IIA: Institute of Internal Auditors

EEA: European Economic Area

EOPYY: National Organization for the Provision of Health Services

ESIDIS: National Electronic Public Procurement System

FATF: Financial Action Task Force

GGAIT: 'Good Governance, Accountable Institutions, Transparency' programme

GIPA/GEDD: General Inspector of Public Administration

GRECO: Group of States against Corruption

GSAC: General Secretariat Against Corruption

HDP: Hellenic Data Protection Authority

HSPPA: Hellenic Single Public Procurement Authority

IAPR/AADE: Independent Authority for Public Revenue

ICBPA/SEEDD: Inspectors-Controllers Body for Public Administration

NACAP: National Anti-Corruption Action Plan

NAPOG: National Action Plan on Open Government

NCBAA/ESOEL: National Coordinating Body for Audit and Accountability

NPDD: Legal Entities of Public Law

NTA/EAΔ: National Transparency Authority

OECD: Organisation for Economic Co-operation and Development

OGAP: Open Government Action Plan

OGP: Open Government Partnership Initiative

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OLAF: European Anti-Fraud Office

PPACC: Public Prosecutor Against Crimes of Corruption

PPMU: Public Procurement Monitoring Unit

PR: proportional representation

SDOE: General Directorate for Financial and Economic Crime Unit

SEEDD: Inspectors-Controllers Body for Public Administration

SELDD: Body of Controllers of Public Administration

SOEE: Coordinating Body for Inspection and Control

SRSS: Structural Reform Support Service of the European Commission

TFGR: Task Force for Greece