OECD Anti-Corruption and Integrity Outlook: Country Fact Sheet 2024





Contextual factors

State structure	Executive power	Legislative system	Legal system
Unitary	Parliamentary	Unicameral	Civil law

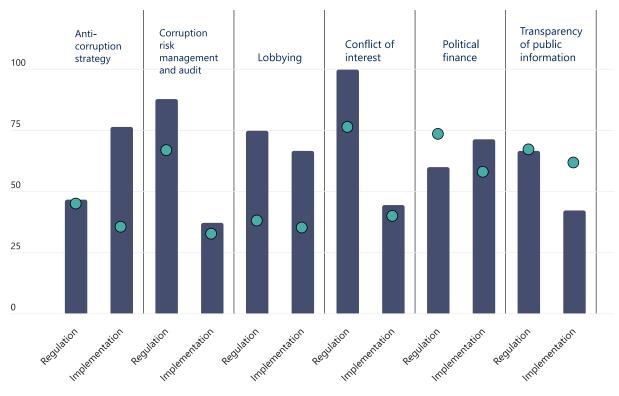
Strategy and institutions on anti-corruption and public integrity

In 2022, Greece adopted the <u>National Anti-Corruption Action Plan 2022-2025</u> (NACAP). The main objectives of the NACAP are to 1) continuously strengthen citizens' trust in Greece's institutions, 2) steadily improve the country's investment climate, and 3) systematically improve Greece's score in relevant global and European indices.

In terms of institutions, the central coordinating body for the integrity system is the <u>Hellenic National</u> <u>Transparency Authority</u> (NTA) with a mandate to strengthen transparency, integrity and accountability in the public sector and to prevent, deter, detect and address fraud and corruption in public and private entities. The NTA is responsible for preparing, monitoring, evaluating, and updating the NACAP, as well as coordinating the actions required for its implementation, in cooperation with all the co-competent bodies. The NTA is also responsible for overseeing transparency in lobbying activities as well as for developing Greece's internal control and audit systems. The <u>Audit Committee of the Hellenic Parliament</u> is the independent authority responsible for overseeing political finance. Open data policy is overseen by the <u>Ministry of Digital Governance</u>, although its mandate does not include public information issues.

Overview

Figure 1. Overview



Greece OECD

Greatest strengths	Areas to improve	
Corruption risk management and audit - regulation	Corruption risk management and audit - implementation	
Conflict of interest – regulation	Anti-corruption strategy	
Lobbying	Transparency of public information	

Anti-corruption strategy

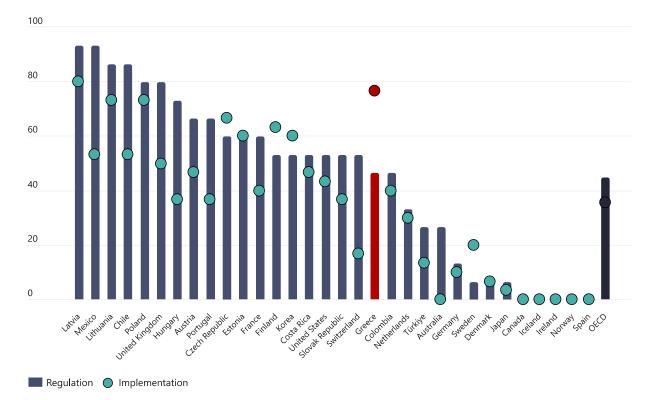


Figure 2. Anti-corruption strategy

The NACAP 2022-2025 is the first strategic plan adopted at the level of government in Greece, including strategic objectives on reducing fraud and other types of corruption across the public sector, as well as on mitigating public integrity risks in public financial management and internal control and risk management. The development process of the NACAP 2022-2025 included extensive consultations with the public, government entities and civil society organisations. In addition, monitoring, reporting and evaluation arrangements are included in the strategy and monitoring and evaluation reports are publicly available online. However, the NACAP 2022-2025 currently lacks evidence-based problem analysis and use of diagnostic tools to inform its approach.

Corruption risk management and audit

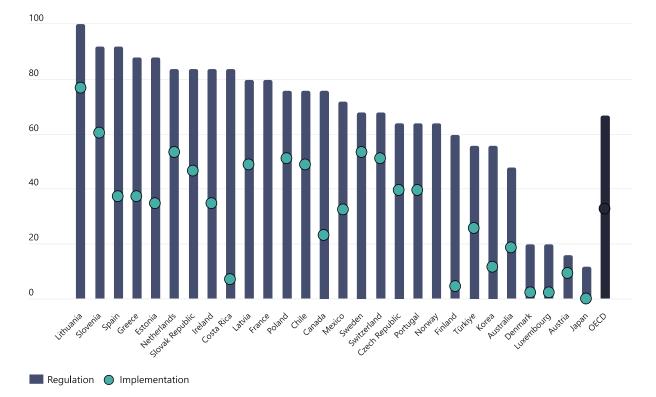


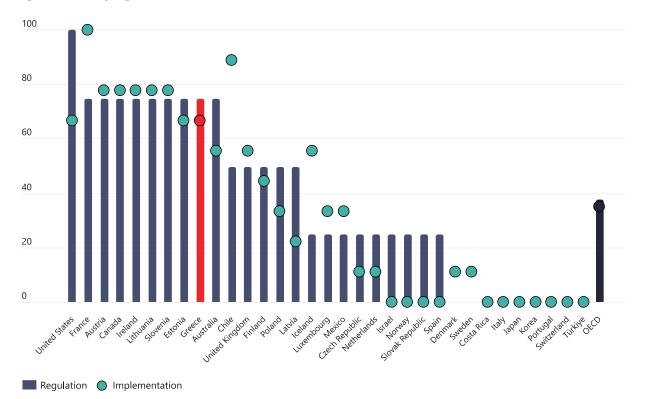
Figure 3. Corruption risk management and audit

As measured against OECD standards on risk management, which includes internal control and audit, Greece has a comprehensive regulatory framework fulfilling 88% of criteria on regulations and 37% of criteria on practice, compared to the OECD average of 67% and 33%, respectively. The regulatory framework defines internal control and internal audit according to international standards. In addition, Greece has established standards of conduct and ethical behaviour for ministers, members of parliament, civil servants and other political appointees, which are published. Regarding internal audit, Greece's regulations ensure the independence of the internal audit function and require Internal Audit Units to develop an internal audit activity manual based on a standard methodology. Standards of conduct and ethical behaviour of internal Auditors. The regulatory framework also places restrictions on internal audit staff auditing operations for which they used to be responsible to avoid any perceived conflict-of-interest. Regulations in Greece establish a risk management framework, which explicitly addresses public integrity risks and delegates responsibility for conducting risk assessments to management. Public bodies are also required to prepare entity-wide risk registers recording risks of corruption and fraud.

However, Greece could improve internal audit and risk-based approaches in practice and the use of integrity risk management in budget organisations. Internal Audit Units are not staffed according to legal requirements. Few organisations have adopted audit procedure manuals and there are no annual reports on internal control and audit available. In the area of risk management, not all organisations have conducted at least one risk assessment exercise in the past three years and only a few organisations have established a system for documenting the results of risk assessments. As Greece's system matures these criteria may be met.

Lobbying

Figure 4. Lobbying



As measured against OECD standards on lobbying, Greece is above the OECD average, fulfilling 75% of criteria on regulations and 67% of criteria on practice, compared to the OECD average of 38% and 35% respectively. In particular, the regulatory framework on lobbying defines lobbying activities and which actors are considered as lobbyists and establishes cooling off periods for public officials. A Code of Conduct for lobbyists has been adopted regulating interactions between public officials and lobbyists and including practical examples of at-risk or undesirable behaviours and situations. Moreover, a lobbying register is publicly accessible including information on lobbyists and lobbyists and progenisation, domain of intervention and type of lobbying activity.

Conflict of interest

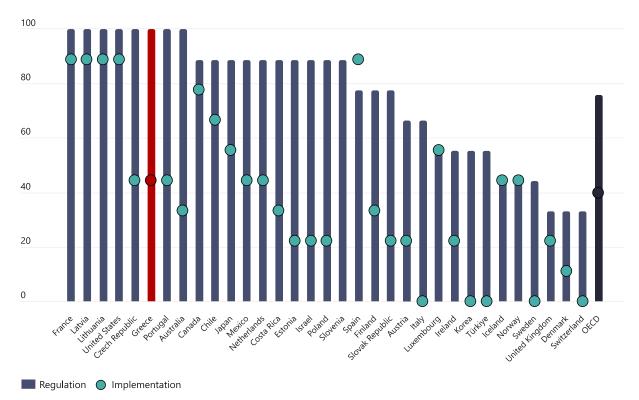


Figure 5. Conflict of interest

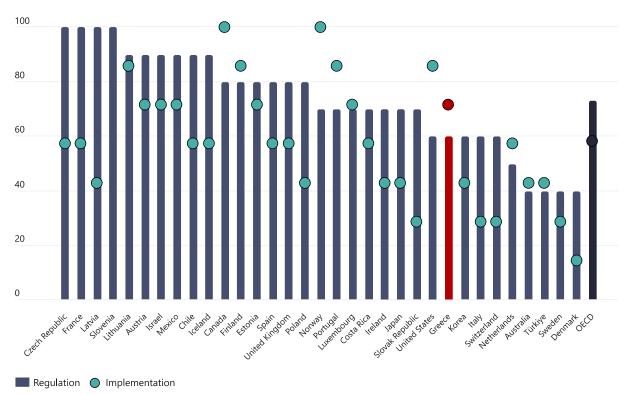
As measured against OECD standards on conflict-of-interest safeguards, Greece fulfils all criteria on regulations and 44% of criteria on practice, compared to the OECD average of 76% and 40%, respectively. Greece's conflict-of-interest regulations list incompatibilities between public functions and other public or private activities, define circumstances and relationships that can lead to conflicts of interest, and establish the obligation to manage them. Furthermore, regulations establish disclosure requirements, define categories of declarants, and set out procedures for submission, compliance and content verification. Interest declarations from members of Government, parliament, the highest bodies of the judiciary, top-tier civil servants of the executive branch and employees in high-risk positions are submitted as a minimum upon entry and any renewal or change in public office. Regulations further establish sanctions for breaches of conflict-of-interest provisions.

However, although declarations to be verified are selected according to a risk-based approach and all declarations are submitted electronically, submission rates of interest declarations remain low. Additionally, the responsible authority has not issued recommendations for resolution for all identified cases of conflict of interest.

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Political finance





As measured against OECD standards on political finance, Greece fulfils 60% of criteria on regulations and 71% of criteria on practice, compared to the OECD average of 73% and 58%, respectively.

The country's framework establishes personal liability of electoral candidates for breaches of political finance regulations and bans contributions from publicly owned enterprises. Political parties and candidates are required to report their finances during electoral campaigns. The financial reports of political parties and coalitions are published and available on the website of the Audit Committee of the Hellenic Parliament. However, Greece's regulatory framework on political finance does not ban anonymous donations, contributions from foreign states or enterprises and the use of public funds and resources in favour of or against a political party. Further, the regulations do not establish a ceiling for electoral campaign expenses for parties, candidates and third parties.

In practice, oversight of financing of political parties and election campaigns is ensured by an independent body (the Audit Committee of the Hellenic Parliament) which employs certified auditors. All financial reports are available from one single online <u>platform</u> in a user-friendly format. However, there is no published information on the number of cases related to breaches of political finance regulations, the number of investigations conducted, and a breakdown of the different types of sanctions issued.

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Transparency of public information

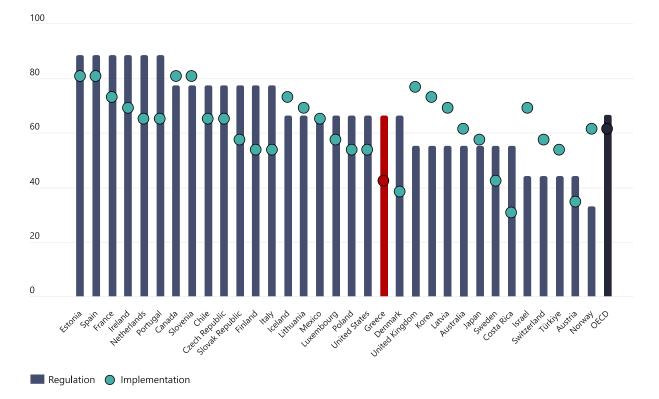


Figure 7. Transparency of public information

As measured against OECD standards on access to public information and open data, Greece fulfils 67% of criteria on regulations and 42% of criteria on practice, compared to the OECD average of 67% and 62%, respectively. The regulatory framework establishes statutory deadlines for processing requests for information and ensures the right to appeal to an independent body or the court against refusal or inactivity of an administrative body. Greece's data are open by default and public consultation is required for draft laws with a minimum established duration for the consultation period. However, Greece is lagging regarding the coverage of basic functions to implement access to information and open data. For instance, there is no statistical data on requests for access to information and decisions have not been aggregated and published by the relevant public body. Agendas of formal government sessions are usually not made publicly available prior to the sessions.