



NATIONAL ANTI-CORRUPTION ACTION PLAN (NACAP) 2015-2018

Connection to specific action plan objectives and actions/measures of the revised NACAP 2018-2021

S/N	Objectives	Actions	Responsible Authority	Start	End	Number of Specific Action-Plan Objective of the revised NACAP	Number of Action/Measure of the revised NACAP
I. Tasks and duties of the Alternate Minister of Justice, General Secretariat against corruption							
1	Beginning the co-ordination of the anti-corruption efforts at a national level and establishment and commencement of operation of the Governance structure for the co-ordination of the anti-corruption authorities by: 1) appointment of a General Secretariat against Corruption (GEGAD), 2) effective co-ordination between inspection and control bodies including	1) Appointment of National Anti Corruption Coordinator, establishment of Coordination Committee and Advisory Board.	Prime Minister/Government of Greece, Minister of State, General Secretariat against corruption, relevant ministers, inspection and control bodies, prosecutors, relevant authorities (Financial	2013	30.6.2013		
		2) A clear working plan for the Coordination Committee and Advisory Board will be done for year 2014 and later biannually.		Started	30.6.2014, 31.12.2014		
		3) Establishment of the Minister of State against corruption		6.2.2015	6.2.2015		
		4) Establishment of the General Secretariat against Corruption (GEGAD)		19.3.2015	19.3.2015		
		5) Establishment of the high level committee.		24.7.2015	24.7.2015		
		6) A clear working plan for the high level committee will be done on an annual basis. (Difference between the greek and the english version).		22.9.2015	22.9.2015		
		7) Annual update of mapping of the responsibilities between authorities will be defined and published.		Started	30.09.2015		

<p>prosecutors under the same umbrella including both co-ordination of criminal investigations and co-ordination of administrative inspections to avoid overlapping and enhance co-operation and,</p> <p>3) establishment of a high level committee against corruption.</p>	<p>8) Co-ordination for corruption cases will be defined clearly and guidelines will be given to all anti-corruption authorities in order to avoid overlapping and enhance co-operation through liaison officers.</p>	<p>Secretaries (Finance Intelligence Unit, Special Secretariat for Financial and Economic Crime Unit (SDOE), Financial Economic Police and other related authorities)</p>	1.10.2015	31.12.2016		13.2.1
	<p>9) Regular follow up made by the General Secretariat against Corruption will be done on effectivity of co-ordination through the liaison officers including feedback and proposals from prosecutors.</p>		1.10.2015	30.6.2016 (continuous - every June)		13.3.3
	<p>10) Explore the possibility of reconstruction and rationalization of the anti-corruption authorities.</p>		1.1.2016	31.12.2016		13.9
	<p>1) Annual analysis of effectiveness of anti-corruption legislation will be done.</p>		1.6.2016	30.6.2016 (continuous - every June)		13.3.3
	<p>2) Annual analysis of all corruption prosecutions will be made.</p>		1.10.2015	30.6.2016 (continuous - every June)		13.2.1 & 13.3.2

2	Monitoring of all anti-corruption controls and related legislation	3) Regular quantitative and qualitative assessment of effectiveness of anti-corruption controls including inspections will be made.	General Secretariat against corruption, Ministry of Justice, relevant authorities	1.11.2015	30.6.2016		13.2.1 13.2.7 & 13.2.8 13.3.2
		4) Recommendations made by national authorities are implemented by the relevant authorities to which they are addressed to.		1.1.2016	31.12.2016		

3	Develop measures to ensure transparency of public expenditure, public contracts and budgetary process.	1) Publicity of all processes of public expenditure, public contracts and budgetary will be increased.	Ministry of Competiveness, Infrastructure, Tourism and Shipping, Single Public Procurement Authority (SPPA)	2014	10.6.2014	1.1	
		2) Public procurement rules and procedures will be set fully in line with international requirements and recommendations.		Started	31.3.2016		
		3) Identification of relevant anti-corruption measures and actions for public expenditure, public contracts and budgetary processes will be made.			31.10.2015		

4	Strengthening law enforcement institutional capacities and resources to investigate and prosecute corruption and economic crime-related offences.	1) Active and mutually supportive coordination will be guaranteed by a co-ordination mechanism with defining tactical and operational priorities and goals for pre-trial investigation and prosecution processes of anti-corruption. Risk sectors of corruption will be defined as a priority for the co-ordination mechanism.	Ministry of Justice, General Secretariat against corruption	1.9.2015	31.10.2015		13.2.1
		2) Regular reporting by this coordination mechanism to the General Secretariat against corruption of institutional capacities, resources, priorities and results of investigations and prosecutions.		1.1.2016	31.12.2016		
II. Implementation of the "Transparency"							
5	Ensure ownership of all stakeholders and political backing for the national strategy by approval of the Parliament.	Parliament approves "TRANSPARENCY".	Parliament	11.4.2014	11.4.2014		
6	Ensure ownership of all stakeholders and political backing for the national strategy by approval of the Parliament.	New Parliament approves "TRANSPARENCY".	Parliament	1.9.2015	31.12.2015		

7	Political endorsement of "TRANSPARENCY"	Cabinet publicly endorses "TRANSPARENCY".	Greek Government	2012	20.12.2013		
8	Political endorsement of "TRANSPARENCY"	New cabinet publicly endorses "TRANSPARENCY".	Greek Government	1.9.2015	31.12.2015		
		1) Annual reports of actions against corruption are submitted to the General Secretariat against corruption by the General Government authorities.		2016	30.6.2016		13.3.2 & 13.3.3

9	<p>Reporting on anti-corruption cases and actions to inform the Government and Parliament of Greece on actions taken against corruption. Greek Government considers annual reports on "TRANSPARENCY" implementation.</p>	<p>2) Based on the decision of the Minister of State according to article 7, par. 2 L. 4320/2015, the relevant report is submitted to the Prime Minister and to the competent Ministers regarding the implementation review of "TRANSPARENCY"</p>	<p>General Secretariat against corruption, all General Government authorities</p>	<p>1.1.2016, 1.1.2017</p>	<p>30.6.2016 (continuous - every June)</p>	<p>11.1</p>	<p>13.3.4</p>
10	<p>Update the strategy on a continuous basis, discussing new measures and tools as appropriate.</p>	<p>1) Alternate Minister of Justice, Transparency and Human Rights and the General Secretariat against corruption will undertake an annual review of "TRANSPARENCY" activities and performance by taking into account proposals from key stakeholders.</p>	<p>General Secretariat against corruption, key stakeholders</p>	<p>1.1.2016</p>	<p>30.6.2016 (continuous - every June)</p>		<p>13.3.2 & 13.3.3</p>

		2) An update anti-corruption action plan will be presented including follow-up of actions as needed.		42156	31.7.2015 (continuous - every July)		13.3.6
11	Programming of "TRANSPARENCY" legislation completed. Periodical review of Anti-Corruption legislation and harmonization with international recommendations given for Greece and monitoring Greece's compliance with EU, OECD, Council of Europe and UNCAC requirements and take all necessary steps to close the gaps and fulfill given recommendations.	1) Agreed legislation will be adopted to bring the Anti-Corruption legal framework in line with relevant international standards, including the UN Anti-Corruption Convention, and the OECD and Council of Europe Anti-Corruption Conventions and recommendations.	General Secretariat against corruption, Parliament, Ministry of Justice, Transparency and Human Rights	2014	7.4.2014	13.10	
		2) The new Law on Anti-Corruption will be adopted by the Parliament.		2014	7.4.2014		
		3) Legislation, other regulation and other measures to adhere the international standards of anti-corruption (EU, OECD, CoE, UN) will be regularly reviewed.		1.8.2015	30.6.2016 (continuous - every June)		13.10.1 & 13.10.2

III. Detection of Risk Areas of Corruption

12	Strengthening of capacity and skills of state internal control units or departments in Anti-Corruption.	Internal control units will regularly report cases of suspected corruption and submit proposals for developing Anti-Corruption activities to the General Secretariat against corruption and to the Alternate Minister of Justice. Regular consultation among the Alternate Minister of Justice, the General Secretariat against corruption and internal control units is achieved through the competent Liaison Officer.	Ministry of Justice of Justice, Transparency and Human Rights , General Secretariat against corruption	1.10.2015		11.3	11.3.3
13	Enhancing of integrity in all processes in the Public Service, Municipal District Areas and Local Governments.	1) The General Secretariat against corruption in coordination with relevant key stakeholders will submit concrete proposals on what kind of actions can be implemented in enhancing the integrity in Public Service, Municipal District Areas and Local Government.	Alternate Minister of Justice, Transparency and Human Rights , General Secretariat against corruption, Ministry of Interior and Public Reform	1.9.2015	31.1.2016		11.1.1 & 13.3.3
		2) Proposals will be sent to the Alternate Minister of Justice, Transparency and Human Rights		1.2.2016	28.2.2016		11.1.1
		3) Further discussions on possible implementation of these proposals will be held with representatives of Public Service, Municipal District Areas and Local Government.		1.3.2016	31.3.2016		
		4) Implementation of actions.		1.4.2016	31.10.2016		

14	<p>1) Consideration of the particular needs in high risk topics and sectors vulnerable to corruption like tax administrations, national health services, public works, (military) procurement and contracts, entrepreneurial investment state loans and local government,</p> <p>2) Establishment of the standards and principles on which the specific administrations or institutions should base their own efforts to enhance the fight against corruption regarding their own activities,</p> <p>3) For the detection of high risk sectors and for the purpose of keeping it updated there should be a clear risk assessment strategy,</p> <p>4) Implementation of the sector-specific strategies by the relevant ministries based on risk-assessments.</p>	<p>1) Vulnerable areas for corruption inside the General Government's structures will be identified. Development of risk-assessment strategies and concrete action plans will be made to improve the situation by using co-ordinated and agreed approach to methods and evaluation procedures. Especially the evaluation methodology of corruption vulnerability for high-risk areas will be established.</p>	General Secretariat against corruption, Relevant Ministries	2014	31.12.2015	2 & 3 & 4 & 5 & 10	
		<p>2) An overall picture of corruption per institution (including Local Govs) and of the proposed sector specific strategy will be made and provided to the General Secretariat against corruption.</p>		1.9.2014	31.3.2016		
		<p>3) Establishment of sector specific strategies is a part of this Action Plan and they are implemented independently by relevant authorities.</p>		1.4.2016	31.12.2016		
		<p>4) Development of a sound monitoring, follow-up of results and annual reporting on anti-corruption action plans in all sectoral areas will be performed by each agency or ministry. Each agency or ministry reports on a regular basis to the General Secretariat against corruption.</p>		1.1.2017	31.12.2017		

		<p>5) Relevant IT-systems supporting risk-assessment will be established.</p>	<p>1.1.2017</p>	<p>31.12.2017</p>		
		<p>1) Resource needs will be submitted to the Alternate Minister of Justice and to the General Secretariat against corruption via the liaison officers and via the rest anti corruption agencies.</p>	<p>1.12.2015</p>	<p>31.12.2015</p>		<p>13.9.1</p>

15	Undertake a financial, human resource, equipment and logistical study of anti-corruption agencies to establish the sector needs and assist with future planning.	<p>2) The Alternate Minister of Justice, Transparency and Human Rights and the General Secretariat against corruption will analyse the overall situation and propose recommendations to the Government and the Greek Parliament if needed.</p>	Ministry of Justice of Justice, Transparency and Human Rights , General Secretariat against corruption	1.1.2016	30.6.2016 (continuous - every June)		13.9.2
16	Provision of an enhanced system for detection and monitoring of declaration of assets, conflicts of interests and incompatibilities by public and elected officials, as well as for members of government, including sufficiently deterrent penalties for misreporting.	<p>1) Special law preparation committee is active and operational.</p> <p>2) A new legislation following international standards (EU, OECD, CoE, UN and international best practices) concerning declaration of assets, conflicts of interests and incompatibilities of public and elected officials and Members of Government will be presented and adopted providing sufficiently deterrent penalties for misreporting.</p> <p>3) A general information system will be established introducing the electronic monitoring of declaration of assets and conflict of interests for all General Government bodies.</p>	Ministry of Justice, Transparency and Human Rights , General Secretariat against corruption, Parliament, Relevant authorities	31.3.2014	31.7.2014		
				31.3.2014	31.10.2015		
				1.10.2015	31.12.2015, 31.12.2016		

		4) For declaration of assets an effective monitoring of declarations and implementation of further actions will be done by independent bodies with investigative power through risk-based audits.		1.7.2015	31.12.2015, 31.12.2016		9.1.1
IV. Educational Actions							
17	<p>1) Increased information on corruption and anti-corruption actions given to public and private sector.</p> <p>2) Increased national consensus on integrity based values.</p> <p>3) Increased integrity awareness among young people. Monitor public attitudes to accountability issues and service delivery.</p>	1) A website for the General Secretariat against corruption will be set up. Information on anti-corruption actions will be published regularly.	General Secretariat against corruption, Ministry of Justice, Transparency and Human Rights, General Secretariat of Information and Press, Ministry of Education	1.9.2015	30.9.2015		
		2) Regular public information briefings on case management and the delivery of justice (administrative and criminal) will be delivered.		2014	31.12.2015		13.2.2
		3) Integrity forming programmes aimed at young people will be devised and promoted.		1.10.2015	31.12.2016		14.1

18	<p>1) Development of a training policy to support long-term anti-corruption strategic planning and capacity development,</p> <p>2) Train staff of Inspector General and the Office of the Commissioner General of the State, inspection bodies of ministries, Special Secretariat for Financial and Economic Crime Unit (SDOE), Financial Police, Financial Prosecutors and Financial Intelligence Unit in anti-corruption investigations. Training of judges should also be considered.</p>	<p>1) A common training policy and programme with activities and capacity development for anti-corruption agencies and other relevant authorities will be provided.</p>	<p>General Secretariat against corruption, Relevant authorities</p>	<p>1.9.2015</p>	<p>30.9.2015</p>	<p>13.2.14</p>	
<p>2) The training programme consists of three levels; 1. A general level to trigger identification skills of investigators for larger groups. 2. The second level consists of in depth training for smaller groups of dedicated financial investigators, including specific topics, methods and techniques that can be different per organisation. 3. The third level consists of training on the job for a few hand picked professionals on particular topics and ongoing investigations.</p>	<p>1.1.2016</p>	<p>30.6.2017</p>					

		<p>3) A specialised training for prosecutors and magistrates about Structural Funds will be provided.</p>		1.1.2016	31.12.2017		
V. Monitor Controlling of Corruption							
		<p><u>Level/platform 1:</u> 1) Exploring the need of rationalisation, reform and monitoring of current structures of inspection or audit and control authorities, 2) internal control units of anti-corruption will be established in ministries, 3) inspection bodies will be sufficiently resourced to execute inspections and 4) the General Secretariat against corruption will develop a Strategic Plan for inspection bodies.</p>		1.10.2015	31.12.2016		<p>10.3 & 13.9 & 13.9.3 (Concerning 19.1.3) & 13.2.12 (Concerning 19.1.4)</p>

19	<p>Strengthening of internal control mechanisms relating to anti-corruption by strengthening the 'circles of defence' in four levels/platforms: inspection bodies within ministries (level/platform 1), general inspection (level/platform 2), law enforcement, prosecution and judiciary (level/platform 3) and Parliament (level/platform 4).</p>	<p><u>Level/platform 2:</u> The General Secretariat against corruption will strengthen coordination of the administrative audit and inspection mechanisms of corruption in order to reduce the total time demanded for inspection by preventing multiple and parallel inspections as much as possible, by standardizing inspections and by arranging combined inspections, if efficient. Improving the coordination of inspection bodies and control mechanisms through the operation of Liaison Officers under the General Secretariat against corruption auspices. One of the main priorities is to exchange information especially on corruption cases.</p>	General Secretariat against corruption, Alternate Minister of Justice, Transparency and Human Rights	1.5.2015	31.12.2016		13.2.9 & 13.2.10
		<p><u>Level/platform 3:</u> Strengthening the co-ordination of the criminal investigations of corruption crimes, authorities will increase co-ordination and information sharing mechanisms for investigations of financial and economic crime by exploring the adoption through the formation of the proper legislative framework of a coordination mechanism.</p>		1.10.2015	31.10.2015		13.2.1
		<p><u>Level/platform 4:</u> In order to enhance the progress of anti-corruption activities Alternate Minister of Justice, Transparency and Human Rights will report on the implementation of the National Anti Corruption Plan according to the provision article 7, par. 2, L. 4320/2015.</p>		1.1.2016, 1.1.2017	30.6.2016 (continuous - every June).		13.3.3
		<p>1) Specific measures and actions to enforce compliance of ministries and agencies with observations and proposals will be formulated by inspection bodies and the Ombudsman in case the compliance is obligatory by the law.</p>		30.9.2013	30.9.2013		

20	Compliance of ministries and agencies with observations and proposals formulated by inspection bodies and the Ombudsman in case the compliance is obligatory by the law.	2) Regular follow-up and reporting on the effectiveness of these actions will be made via the liaison officers operating in the General Secretariat against corruption.	General Secretariat against corruption, Relevant authorities	1.6.2014	30.6.2014, (continuous - every June)		13.7 & 13.7.1
		1) Annual public opinion polls or surveys and their changes on corruption and anti-corruption actions in Greece for public and private sector will be done to follow the effectiveness of all anti-corruption work. Increased knowledge of the impact of professionalisation on quality service delivery as well changes of a national consensus on integrity based values are followed in these polls.		1.1.2016	30.6.2016		14.2.2
		2) Publicly available citizen information and citizen -rights impact reports will be arranged through anti-corruption web site or other measures.		1.9.2015	31.12.2016		14.2.3

21	<p>1) Strengthening awareness raising and civil society participation, including empowerment of citizens.</p> <p>2) Increased collaboration between state and non-state actors.</p> <p>3) Monitor public attitudes to accountability issues and service delivery.</p>	<p>3) A citizen complaint system will be set up including a focus on prioritisation and effective follow up.</p>	<p>General Secretariat against corruption, Secretariat General of Information and Communication</p>	<p>1.9.2015</p>	<p>31.12.2015 (continuous)</p>		<p>13.3.8 & 13.4.4</p>
<p>4) An annual Anti-Corruption campaign to promote public participation awareness and ownership will be initiated and awareness raising of actions against corruption will be increased in all sectors.</p>	<p>1.1.2016</p>	<p>31.12.2016</p>		<p>14.2</p>			

22	Starting of a research to support policy development and implementation in conjunction with key stakeholders of "TRANSPARENCY".	A research will be undertaken or a working group is started to reflect on the possibilities for further co-operation and actions against corruption between most relevant state authorities and private sector representatives (NGOs, business sector, universities, schools, labour unions, professions etc.).	General Secretariat against corruption	1.1.2016	31.12.2016		
		1) Measures will be taken to give cases of corruption regarding civil servants and public officials a priority in investigations and prosecutions.		2013			13.2.1,13.2.11, 13.2.12, 13.2.7 , 13.1.2. 13.1.1.

23	Improving the timelines that justice is obtained, both in terms of duration of proceedings and statute of limitations. Improving the legal framework of prosecutorial proceedings. More effective use of administrative actions as a mechanism to reduce pressure on judicial system.	2) After inter-sectoral consultations an analysis of the current processes in prosecution service and in courts will be made including identification of gaps, obstacles and issues for improvement, in particular in order to improve the speediness of the legal proceedings.	General Secretariat against corruption, Ministry of Justice, Transparency and Human Rights	1.1.2016	31.12.2016	12.1.1 12.1.2 12.1.3 12.1.4	
		3) Statute of limitations will be brought in line with OECD (OECD Anti-Bribery Working Group practice) standards.		1.1.2016	31.12.2016		

24	Improving of the co-ordination of investigations in high-risk areas like tax, health and urban planning.	Regular reporting of priorities and results in co-ordination of investigations will be made to the Minister of Justice, Transparency and Human Rights and to the General Secretariat against corruption	General Secretariat against corruption	1.1.2016	31.12.2016		13.3.2
VI. Maintaining and Management of Corruption							
		1) Support for the remaining implementation of the Road Map on Anti Money Laundering and the New Agenda on Anti Money Laundering is done, where necessary		1.7.2014	31.12.2015		
		2) Drawing up typologies regarding the link between corruption and money laundering will be made, including making use of the FATF reports on Laundering the Proceeds of Corruption and Red Flag indicators.		1.12.2015	30.3.2016		13.13.1

25	Active collaboration between the newly appointed Anti Money Laundering Strategy Committee (supported by its working group the Anti Money Laundering Co-ordination Committee) and the General Secretariat against corruption.	3) Exploring and advising will be done on the best way to enhance the currently operational registry of bank accounts.	General Secretariat against corruption, Anti Money Laundering Coordination Committee, Relevant authorities, Financial Intelligence Unit	1.9.2015	31.12.2015	13.13	1.2
		4) Exchange of information between Financial Intelligence Unit and the General Secretariat of Public Revenue and the Financial Economic Police will be improved.		1.9.2015	31.12.2015		13.13.2
		5) Appointing specialised prosecutors and inspection magistrates in financial matters will be considered.		20.3.2013	20.3.2013		

26	Strengthening exchange of practical experience and information of financial crime and bribery investigations between representatives of internal control mechanisms and law enforcement.	1) Exploring improvement of procedures to report cases and exchange of information between law-enforcement agencies through the establishment of a co-ordination mechanism for investigations of financial and economic crimes.	Alternate Minister of Justice, Transparency and Human Rights, General Secretariat against corruption, all Ministries	1.10.2015	31.10.2015		13.2.1
		2) Exploring the set up of an IT -based Case Management system(s) where all criminal investigations or audits, administrative audits and prosecutions are registered in order to ease relevant authorities fighting against corruption and economic crime to find out information on ongoing cases and suspects based on certain criteria according to the law and the Constitution.		1.1.2016	31.12.2016		

		<p>3) Experience and results from the two co-ordination mechanism (platforms) will be reported to the Alternate Minister of Justice, Transparency and Human Rights. Relevant authorities will analyse the need for further actions and make recommendations to improve exchange of information between authorities and quality of audits and investigations.</p>		1.1.2016	30.6.2016, (continuous - every June)		<p>13.2.9 /13.2.10/13.3.2</p>
		<p>4) The Alternate Minister of Justice will report on the relevant results of the co-ordination mechanism and on the needs of further actions in his report according to the provision of article 7 par 2 L. 4320/2015.</p>		1.1.2016, 1.1.2017	30.6.2016, (continuous - every June)		<p>13.3.3</p>

27	Assess how to tackle corruption and related fraud issues specifically linked to the use of EU funds with a view to improving Greek management and control systems.	<p>1) Prepararation and implementation of a special Anti-Fraud (AF) strategy for Greece for all Government will be made according to international and EU standards based on the "Final report review Anti-Fraud and related anti-corruption issues in the area of the Structural Funds in Greece suggestions for improvements", including a multi-annual Action Plan covering all EU co-financed programmes the field of European Structural and Investment Funds and including development of necessary methods and tools.</p>	General Secretariat against corruption, Ministry of Development, Tourism, Infrastructure, Shipping	Started	31.12.2015		13.4.1, 13.4.2, 13.4.3, 13.4.4, 13.3.1, 13.5.4
		<p>2) The General Secretariat against corruption, as the Greek Anti-Fraud Co-ordinator Service, will monitor the implementation of the identified mesures falling under the responsibility of the Ministry of Development, Tourism, Infrastructure, Shipping or other parts of the government, whom themselves keep responsibility for the implementation.</p>		19.3.2015	19.3.2015		
		<p>1) A special law preparation committee is active and operational.</p>		7.4.2014	7.4.2014		

28	Improvement of the criminal legislation and procedure concerning corruption related offences and white collar crime, including: 1) aspects related to immunity of members of parliament and government, 2) regulations and procedures for giving and accepting gifts which need to be clarified in the public administration and 3) protection of whistleblowers following the recommendations of international organisations and international standards.	2) The General Secretariat against corruption will make recommendations or proposals for amendmends of legislation into a new Anti-Corruption Law adopted by the Parliament including aspects related to immunity of members of Parliament and Greek Government, also with a view to bringing these aspects in line with relevant GRECO recommendations.	General Secretariat against corruption, Ministry of Justice, Transparency and Human Rights	1.10.2014	31.5.2016		9.2.1 & 9.2.2
		3) The General Secretariat against corruption will make recommendations or proposals for new clarified regulations and procedures for giving and accepting gifts for public administration.		1.4.2016	30.6.2016		11.1.6
		4) The General Secretariat against corruption will make recommendations or proposals for amendmends of legislation of the whistleblower protection.		1.1.2016	31.3.2016		11.2.1
		5) Effective protection mechanisms of whistleblower protection will be established and implemented.		1.1.2016	30.10.2016		11.2
		6) Permanent follow-up on the functionality of these new processes will be done and training provided for the whole administration and especially for the risk sectors of corruption on gifts.		1.11.2016	30.6.2017		11.2.3
29	Explore on the recent withdrawal of the right for the Inspector General to appeal to disciplinary decisions when the case was not initiated by the General Inspector for Public Administration.	Necessary amendments to legislation will be made.	General Secretariat against corruption, Ministry of Justice, Transparency and Human Rights	2012	2013		
		1) Establishment of anti-corruption prosecutors.		2013	20.3.2013		

30	Strengthening the administrative legal framework regarding sanctionability.	2) The current framework of administrative sanctionability and the necessity of raising sanctions in order to reduce pressure on judicial system will be analysed.	General Secretariat against corruption, Ministry of Justice, Transparency and Human Rights	1.10.2015	31.7.2016	12.1 & 12.1.4	12.1, 12.1.3 & 12.1.4
		3) Necessary amendments of anti corruption legislation will be made on the basis of the analysis.			1.9.2015		30.9.2017
31	Strengthening of mechanisms for asset recovery.	1) The existing legal framework will be improved by taking into account international standards (OECD, CoE, UN, UNTOC, international best practices) on asset recovery, by preparation and adoption of strengthening the asset recovery (freezing, seizure and confiscation etc.) and by exploring the possibility to pledge frozen assets with the consent of the owner of the bank account to fully satisfy the Government including the payment of tax debts.	General Secretariat against corruption, Ministry of Justice, Transparency and Human Rights, Ministry of Finance	1.10.2015	1.3.2016	1.3	1.3.1
		2) A common and coordinated approach towards asset recovery will be developed and implemented for the different agencies.		1.4.2016	31.7.2016		1.3.3 & 1.3.5
		3) Enhancement of the existing system of management of frozen, seized and confiscated assets, for which a best practice is the establishment of a management office for frozen assets and provide for guidance on how to manage confiscated assets.		1.9.2016	31.12.2016		1.3.2 & 1.3.4
		4) The obligation of law-enforcement and judicial authorities to report on seizure, confiscation and freezing orders to SDOE will be enforced and implemented.		1.9.2016	31.12.2016		1.3.3/1.3.4/1.3.5

32	Exploring the possibilities of improving the mutual legal assistance arrangements (MLA) with relevant partner countries to guarantee effective MLA.	A research exploring possible gaps in existing mutual legal assistance arrangements (MLA) system according to international standards (EU, OECD, CoE, UN) will be made with recommendations for improved co-operation on anti corruption mutual legal assistance arrangements (MLA) arrangements with relevant partner countries, including a focus on internal procedures to request for and use this information in ongoing investigations.	General Secretariat against corruption, Ministry of Justice, Transparency and Human Rights	1.9.2015	31.12.2015	13.12	
33	Preparation and presentation of methods for improved corruption fighting and introduction of a corruption proofing methodology.	Liaison Officers operating under the General Secretariat against corruption auspices will identify measures in improving technical investigations in corruption crimes and in collecting necessary evidence. Liaison Officers will submit identified measures and proposals to the Alternate Minister of Justice, Transparency and Human Rights and to the General Secretariat against corruption.	General Secretariat against corruption	1.10.2015	30.6.2017		

34	Proven parliamentary decision to play a primary role in anti-corruption.	Adoption of a Code of Conduct for members of the Parliament.	Parliament	1.9.2015	31.3.2016	9.6	
35	Proven political will of the Government to start from itself.	Integrity Code of Conduct for Greek Government (Cabinet) adopted.	Prime Minister, Cabinet	30.6.2014	30.6.2014		9.6.3
36	An effective framework for transparency, supervision and sanctioning of political party financing.	Legislation on the funding of political parties will be presented and adopted by the Parliament following international standards (Council of Europe).	General Secretariat against corruption, Parliament, Ministry of Interior	1.9.2015	30.11.2015	9.3	9.3.1
37	Codes of conduct and ethics for all public and local officials have to be established.	General Government bodies Integrity Codes of Conduct will be improved by the Ministry of Public Administration in coordination with the General Secretariat against corruption as well as adopted and implemented.	General Secretariat against corruption, Ministry of Interior and Administrative Reform	1.10.2015	30.6.2016	11.1.6	

38	Introduction of public officials and integrity tests.	Necessary anti-corruption information will be made regularly available and training for newcomers, key middle-management groups and individuals in General Government bodies will be arranged.	General Secretariat against corruption, Ministry of Interior and Administrative Reform	30.9.2014	30.9.2015	11.1.3 & 13.2.13	
39	Increased adherence by professionals and their associations to established standards and codes.	Development and implementation of codes of conduct among all professional groups and associations including the private sector ones (accountants, lawyers, real-estate agents etc.) will be promoted.	General Secretariat against corruption, General Secretariat of Information and Communication	1.1.2016	31.12.2016		
IX. Accountability and Compliance Reporting							
40	Obligation of Municipal District Area and Local Government to comply with legal Anti Corruption requirements and with objectives of the strategic plan.	An obligation is instituted for Municipal District Area and Local Government to submit an annual report on the audits performed and the outcome to the General Secretariat against corruption reported.	General Secretariat against corruption, Ministry of Interior and Administrative Reform	1.1.2016	31.5.2016	10.3.3	
41	Evaluate the reasons for the lack of implementation of necessary anti-corruption activities and make proposals for remediating those lacks.	The General Secretariat against corruption will take note of the different reports from Municipal District Area, Local Government, Agencies and other sources. The General Secretariat against corruption proposes necessary legal and other regulatory or administrative changes to enhance implementation.	General Secretariat against corruption, Ministry of Interior and Administrative Reform	1.1.2016	30.6.2016 (continuous - every June).	10.2.2	
42	Establishment of a central place or unit where reports on corruption could be received and analysed. For suspicious transactions reports related to money laundering linked to corruption from financial institutions this is Financial	1) The General Secretariat against corruption will receive and analyse reports on corruption.	General Secretariat against corruption, Ministry of	1.11.2015	30.6.2016	13.3.2, 13.13.3 (for both 42.1	

	Intelligence Unit. For reporting between (inspecting and investigating) authorities it might be helpful to consider bundling of information.	2) The General Secretariat against corruption will inform the Minister of Justice, Transparency and Human Rights about the outcomes of the reports on corruption for further proposals.	Justice, Transparency and Human Rights	1.7.2016	31.12.2016	and 42.2)	
43	Explore on the possibilities to give access to the tax audit platform Elenxis to the organisations involved in the anti-corruption network.	Access to Elenxis will be given to prosecutors and possibly to other authorities who may especially need the access in their work of anti-corruption.	General Secretariat against corruption, General Secretariat for Public Revenues	2014	2014	13.14	
44	Use of inducement prizes to identify innovative solutions to reduce corruption	A national awards scheme to recognise integrity and exemplary service will be initiated.	General Secretariat against corruption, Ministry of Interior and Administrative Reform	1.10.2015	31.12.2015	11.1.7	
X. Public Private Partnership							
45	Develop and Operationalise an Anti- Corruption Public Private Partnership (ACPPP) framework. Implement three year ACPPP Action Plan.	1) A detailed workplan will be developed.	General Secretariat against corruption, Secretariat General of Information and Communication	1.10.2015	31.3.2016	8.1	8.1.1
		2) Operational joint activities will be undertaken in areas of mutual interest between public and private sector.		1.4.2016	31.12.2016		
		3) Annual assessment on implementation of "TRANSPARENCY" and ACPPP joint actions will be made.		1.1.2017	31.12.2017		8.1.2

46	Increased cross- community support including the way the independent media can play a role to tackle corruption.	Initiatives to engage the private sector and media as key non-state actors in anti-corruption actions will be set up.	General Secretariat against corruption, Secretariat General of Information and Communication	1.1.2016	31.12.2016		8.1.3
XI. Increased Public Engagement							
47	Development of user friendly information on Anti-Corruption legislation and regulation for public distribution.	1) Easy access to public information (web page) will be made possible.	General Secretariat against corruption	1.9.2015	30.9.2015		
		2) Regular update of information will be done.		30.6.2016	30.9.2016		
This plan is revised once a year (and comments once a month).							