The General Secretariat Against Corruption (GSAC) addresses effectively the implementation of the National Anti-Corruption Action Plan (NACAP 2018-2021)\(^1\), in respect with the relevant timeframe.

The NACAP’s horizontal approach, ensures the coordination among the relevant stakeholders, the effective assistance and cooperation of the public and private sector, as well as the active engagement of the public in the implementation of the relative objectives and actions, while aligning itself with the current international anti-corruption standards (EU, OECD, CoE, UN) and the national strategic action plans of other sectors. More specifically, for the current period, actions of the NACAP have already been linked both to the National Action Plan for the effective combating of money laundering, terrorist financing and proliferation of weapons of mass destruction financing, which is under finalization and to the United Nations (UN) Agenda 2030 on Sustainable Growth.

Focusing on the timely and thorough implementation of the NACAP, GSAC has created a network of the relevant stakeholders for a more efficient and effective coordination on the follow up and implementation of the NACAP. The results of this strategic planning are already visible by the timely acceleration and implementation of the actions due for the second semester of 2018, as outlined in summary below.

**PART 1  Sectoral prevention of corruption in public administration, in the private and political sector**

Regarding the introduction of international accounting standards to the public sector (budgetary processes), the Presidential Decree no. 54/2018 (GG 103 A) has been issued, which lays down the accounting framework that will be applied to the entities of the General Government (action 1.1.1). Furthermore, the extension of the Bank Accounts and Payroll Accounts Registry System in order to incorporate loans, has been technically completed (action 1.2.1). Finally, the establishment of a central registry of beneficial ownership information of legal persons has been ensured by article 20 of Law no. 4557/2018 (GG 139 A), obliging legal persons based in Greece to provide information regarding the beneficial owner to the Central Registry of

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Beneficial Owner, which will be developed by the General Secretariat of Information Systems – GSIS (action 1.4.1\(^2\)).

To ensure the strengthening of transparency in the Private Sector towards a sustainable and without exclusions development, a work plan for Public Private Partnerships against corruption (ACPPP) has been established and adopted (action 8.1.1).

For the enhancement of transparency in the Political Sector, GSAC submitted a proposal to the committee for Constitutional revision, regarding the abolition of the Parliament’s ability to revoke the prosecution of the members of the government by its decision (action 9.2.1\(^3\)), and was further noted that the abolition of the special statute of limitation for the prosecution of current and former members of the government (action 9.2.2\(^4\)) had already been included in the proposal of the President and SYRIZA’s parliamentary group.

Furthermore, for the establishment of an effective framework for transparency, supervision and sanctioning on political parties’ financing, Laws no. 4472/2017 (GG 74 A) and no. 4509/2017 (GG 201 A) were voted, regarding the financing of political parties by private entities and the state, as well as their transparent financial management (action 9.3.1\(^5\)). Moreover, the special permanent Committee for Parliamentary ethics, conducted an assessment of the current Code of Conduct of the Members of the Hellenic Parliament (action 9.6.1). Finally, a proposal regarding the assessment of the Code of Conduct of the Members of the Government was submitted by GSAC to the General Secretariat of the Government and an update is already under process in cooperation with the Prime Minister’s General Secretariat (action 9.6.3).

Part 2  
Public Integrity across Administration and Judiciary System

GSAC has submitted a proposal for amendment of legislation to the Deputy Minister of Justice, Transparency and Human Rights, for the enhancement of legal framework regarding Whistleblower Protection (action 11.2.1).

Regarding the enhancement of integrity and effectiveness of the judiciary system, GSAC completed at the beginning of 2018 a proposal for technical assistance, in cooperation with the Structural Reform Support Service (SRSS) of the European Commission in the context of the SRSP II financial instrument. The draft contract has

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2 Early implementation of the action.
3 Early implementation of the action. GRECO’s 4\(^{th}\) evaluation round recommendation xix
4 Early implementation of the action. GRECO’s 4\(^{th}\) evaluation round recommendation x
5 Implementation of GRECO’s 3\(^{rd}\) evaluation round recommendations i, ii (i), ii (ii), (iii), (vii)
been finalized and submitted to the European Commission for signature (actions 6 12.2.1, 12.2.2, 12.2.3, 12.2.5).

PART 3 Strengthening cooperation, coordination and collaboration across the Public Sector

Aiming at the improvement of the cooperation framework between the judicial authorities and the tax administration in the fight against high level tax evasion, the Directorate of Financial Crimes Investigations was established by Law no. 4512/2018 (GG 5 A) and relative measures for its adequate staffing have already been taken (action 13.1.1).

Additionally, regarding the creation of a monitoring procedure of certain cases of important financial crimes, especially corruption and money laundering cases, a proposal has been made (action 13.2.2 1) and relative circulars have been sent by the Supreme Court to the Prosecutors’ Offices across the country. Thus a reliable database on prosecution and sanctioning is being created (action 13.2.2 2). GSAC has already made the relative data available on its website after processing, according to the GDPR and the criminal procedure7.

Law no. 4478/2017 (GG 91 A) strengthened the disciplinary powers of the General Inspector of Public Administration (GIPA), while its competence to audit the assets of any official, employee, or body of the general Public Sector, was further extended to those not obliged to submit a declaration of assets. Moreover the same law provided for GIPA’s involvement in the Strategic and Operational Planning of Public Sector Inspections and Audits (action 13.2.9). GIPA informed the President and Prosecutor of the Supreme Court on issues related to the commissioning and execution of Prosecution orders for a preliminary examination/preliminary investigation by inspectors (actions 13.2.6, 13.2.10). In addition, operational planning of inspections and audits has been developed in order to reduce the total inspection time required (action 13.2.11). Moreover, the National Centre for Public Administration and Local Government (EKDDA) through the Institute for Training (INEP) developed an Audit Certification System, in order to upgrade the audit skills and qualifications of the Inspectors (actions 13.2.12, 13.2.14). It also carried out a number of training programs on anti-corruption issues (action 13.2.13). In November 2018 INEP, after GSAC’s request, organized the Innovative Laboratory entitled "Internal Audit: a Policy Tool in the Public Sector" aiming to the enhancement of the effectiveness of

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6 GRECO’s 4th evaluation round recommendations xii (ii), xv, xvi, xiv
7 http://www.gsac.gov.gr/index.php/el/etisies-ektheses/stats
Internal Audit in the Public Sector, as well as its emergence as a function critical for monitoring, evaluating and improving the procedures (actions 13.2.12, 13.2.13). Furthermore, GSAC’s annual report was issued in June 2018, regarding statutory actions and the implementation of the NACAP (action 13.3.3).

Concerning the complaints submitted to GSAC - including those concerning acts of corruption and fraud in co-funded programs - two circulars have been issued in 2018, for their management and in particular the procedures of receiving, processing, assessing, forwarding and monitoring the complaints, as well as the rapporteurs’ competencies and duties on their handling (actions 13.3.7, 13.4.3).

Moreover, for the automation of the assessment and the monitoring procedures, as well as for the extraction of statistical data, a digital application for complaint management has already been approved and is at the final stage of development (actions 13.3.8, 13.4.4).

GSAC, as the authority responsible for coordinating the fight against fraud (Greek AFCOS), has coordinated the implementation of audit controls of the Special Secretariat for Financial and Economic Crime Unit (SDOE) and the Payment and Control Agency for Guidance and Guarantee Community aid (OPEKEPE) and is already drafting a trilateral Memorandum of Understanding (action 13.4.2).

In order to evaluate the effectiveness of the anti-corruption Authorities, GSAC has sent a specific questionnaire to the Judicial Authorities, the Inspection and Control Bodies, Law enforcement agencies and Independent Authorities, in order to investigate their resource needs (action 13.9.1). Thereafter, GSAC informed accordingly and in detail the Alternate Minister of Justice Transparency and Human Rights (action 13.9.2). GSAC also explored the possibility of using various financial tools to meet the recorded resource needs.

Regarding the active collaboration between the Anti Money Laundering Strategy Committee and GSAC, for the implementation of the National Risk Assessment on Money Laundering and its Action Plan, the Anti Money Laundering Strategy Committee is already in the process of finalizing the National Strategy and the National Action Plan to effectively tackle money laundering, terrorism and the financing of the proliferation of weapons of mass destruction (hereinafter referred to as the "National Action Plan"). Several actions of the NACAP have been adopted in the "National Action Plan", with the active participation of GSAC, promoting the coherence and harmonization of anti-corruption actions included in the two action plans (Specific Objective 13.13).

The National Strategy and the “National Action Plan” are currently being approved by the Strategy Committee in order both to be finalized. The actions of the NACAP to investigate the possibility of extending access to databases of authorities involved in the anti-corruption network (Specific Objective 13.14) are linked to an action of the "National Action Plan" and will be harmonized accordingly.

**PART 4 Education and raising awareness**

GSAC and the Hellenic Ministry of Education, Research and Religious Affairs have signed a Memorandum of Understanding for common actions regarding the promotion of integrity in the Greek Educational System (Action 14.1.1). On 9/12/2018, GSAC organized the Annual Anti-Corruption Forum entitled: “Breaking the Silence – Whistleblowers and Protection of the Public Interest”. At the same time, the two-day Hackathon competition (Computer Programming Marathon) dedicated to integrity in the sport sector, was organized for the second time (Action 14.2.1).