

Road Map for technical assistance in the field of
Anti-Corruption

October 1, 2012

1. Background

1.1. Strengthening the Anti Corruption framework is urgently needed.

While it is widely acknowledged that one of the major problems in Greece is the widespread corruption, countering this issue is crucial to restore general trust in the public administration and to improve the business environment.

The recent Memorandum of Understanding of February 2012 also acknowledges and underlines the importance of an anti corruption program and a fully fledged overall anti corruption strategy.

Political commitment and support of the highest levels for a coherent approach and its implementation is of crucial importance to succeed.

Corruption -according to a broad definition by the EU as “the abuse of power for private gain”- is a very important issue in Greece. This paper will try to provide background on corruption in Greece and analyse lessons from international experience, highlight key policy issues, lay out a suggested roadmap for action, and propose a work program – including the developing of an updated anti-corruption strategy for Greece.

Admittedly is hard to safely estimate the overall size of corruption. A 2010 study by the Washington-USA based Brookings Institution estimated that corruption (bribery, patronage and other public corruption) costs Greece the equivalent of 8% of its GDP or more than € 20bn. This percentage does not include tax evasion or underground economy.

Transparency International's 86-country public survey, the Global Corruption Barometer, tells the same story. 75 per cent of Greek people surveyed in June 2010 thought corruption was increasing, and 18 per cent of households who had contact with a public service in the previous 12 months had paid a bribe. The perceived level of Public Sector corruption for Greece for 2011 is 3.4. According to the latest Eurobarometer on corruption¹ published in February 2012, 98% of the Greek respondents (highest percentage in the EU) consider that corruption is a major problem in their country and 56% think that the level of corruption increased in the last three years. 73% of the respondents in Greece believe that they are affected by corruption in their daily lives.

¹ http://ec.europa.eu/public_opinion/archives/ebs/ebs_374_en.pdf.

A study, published last year by Transparency International, shows that lengthy proceedings and short statutes of limitations pose significant problems for prosecuting corruption in Greece. It is particularly striking that statutes of limitations for parliamentarians and ministers are shorter than for regular citizens. Moreover, an excessive immunity regime of MPs and ministers creates additional obstacles to the prosecution and adjudication of political corruption. Greeks named political parties as the institution they perceived to be the most corrupt (clientelism). This picture is supported by the latest report of Transparency International on Corruption Risks in Europe, while it reports that more than 80 per cent of the people stated that political parties were corrupt. 91% of the Greeks responding to the Eurobarometer survey on corruption believe that there is insufficient transparency and supervision of financing of political parties.

Sectors that seem to be vulnerable to corruption are the tax administration, national health services, public works, (military) procurement and contracts, entrepreneurial investment state loans and local government. According to the latest Eurobarometer survey, corruption is perceived as most endemic in Greece among: politicians at national, regional and local level, public healthcare sector, public procurement, construction permits, inspection services and licencing, customs. These are not necessarily linked to EU funds but there are indications of corruption linked to EU funds.

Corruption is not a separate criminal offence, but appears as a productive source of a series of criminal offences such as active and passive bribery, fraud, economic subsidy fraud, misappropriation, dishonesty, forgery, breach of duty, money laundering, smuggling, tax evasion, etc. It is good to underline GRECO (Group of States against Corruption, working as a body under the Council of Europe) work, while it published in June 2010 a third round evaluation Report on Greece Incriminations and on Transparency of party funding that gives more background to some of the previous issues.

Weak oversight and ineffective regulations have been widely linked to what may be considered as 'legal corruption'. Legal corruption goes beyond bribery and includes influence peddling. Recent research has found that tackling the extent of state capture, and other forms of 'legal corruption' has a positive effect on fiscal deficits, very similar to that of lowering traditional forms of corruption².

Relevant bodies within the Greek administration

- The Office of the Commissioner General of the State as the supreme, independent Judicial Authority that is competent for the supervision of all Financial Inspection bodies of the State, as well as of the General Inspector of Public Administration for cases related to asset recovery. .
- The General Inspector of Public Administration as a non Departmental Authority that is tasked to ensure that public administration functions efficiently and effectively and monitors and evaluates the actions and performance of the Inspection Bodies/Units of Public Administration
- Central coordinating committee of the Ministry of Finance for AML & CTF issues.
- Specialised departmental inspection bodies / units. For example the Internal Affairs Unit of the Police in close connection to the Financial Police. Other internal affairs Units are situated within the Ministries of Transport and Communication, Health and Environment. Further units include the Financial Inspectorate, General Directorate of Customs and Special Taxation of Consumption, General Directorate of Administration and Control of co-financed programs by the European Union, General Directorate of Financial Control, Body of Inspectors of Public Works. It is good to note that recently a new body was created as internal affairs bureau within the Ministry of Finance accountable to the Minister of Finance.
- SDOE via its Financial and Economic Crime Unit.

² Kaufman, D (2010), Can corruption adversely affect public finances in industrialized countries?

- Financial Intelligence Unit
- Financial Public Prosecutors (and courts)
- Supreme Court of Audit
- Greek Ombudsman

International experience can provide useful lessons about corruption and efforts against it:

- A balanced and sequenced approach to fighting corruption, making use of different instruments, is essential. Prevention, detection, prosecution and sanctions, and awareness raising, as well as behavioural and perceptual changes – all are necessary. In particular, due attention needs to be given to prevention and internal control mechanisms – i.e. ensuring that government institutions, systems, and processes are working well enough to minimize vulnerabilities to corruption.
- The institutional framework for fighting corruption needs to be sound. Specialized anti-corruption agencies set up by many developing countries (12 EU countries have such an anti-corruption agency) often fail to achieve their objectives and sometimes even become obstacles. Prospects for success can be improved by giving such agencies a focused rather than a very broad mandate, commensurate resources, strong leadership, accountability for their results and appropriate independence.
- A strategic vision is needed on how to break out of entrenched corruption, and for high-level leadership and effective coordination of anti-corruption efforts. Targeted, focused approaches can yield better results than ambitious and broad-based strategies lacking in implementation and staying power.
- The political dimension of anti-corruption cannot be ignored. Corruption is not only an outcome of weakness of state institutions but also a means for enrichment and empowerment of political elites. Understanding the structure and networks of political and economic power is essential for designing an effective anti-corruption strategy.
- A focused assessment and understanding of corruption issues for individual sectors, agencies, and functions is required. This will provide the basis for concrete actions against corruption which while individually small can add up to significant progress in aggregate.
- Corruption is to varying degrees present in all countries, and although progress in reducing corruption certainly is possible, change takes time. Time, effort, and sustained political will are required, especially in countries with weak institutions

One of the key elements to tackle corruption is to make full use of existing anti-corruption tools and develop new ones, while ensuring coordination and coherence of the entire framework. Anti Corruption measures must be capable of supporting the anti corruption strategy by:

- Sound risk assessments tools.
- Detection and preliminary analysis of suspected corruption.
- Prevention tools
- Suppression tools, including effective, dissuasive and proportionate sanctioning.

- Fast enforcement, prosecution and trials of corruption cases.
- International cooperation.
- Reduction of opportunities for corruption.
- Public awareness raising.

1.2. To prepare a road map.

As anti corruption efforts are not yet put to best use the Greek government has a significant challenge. The first step to fight corruption is building strong anti-corruption measures into key institutions. Transparency, accountability and integrity are concepts that can be translated into concrete actions and enforceable legislation.

Over the course of 26 March to 26 April 2012, bilateral meetings between the TFGR and the several responsible Greek authorities took place which lead to the mutual agreement that the Greek Authorities needed further technical assistance in the field on anti corruption.

TFGR is already coordinating the efforts of Member States on these issues. It has organised a coordination conference in Athens on 26 June 2012 and 7 September 2012 which brought together the European Commission and most of the aforementioned Greek institutions. This conference has helped to identify key priorities, as a first step towards the design of a roadmap for TA in the area of Anti Corruption.

These priorities include:

- Setting up an overall anti corruption strategy with political commitment, including strengthening the anti corruption framework in sectors where appropriate.
- Strengthening coordination, including via a national coordinator and/or via an independent corruption body.
- Strengthening the legal framework.
- Strengthening prevention, awareness raising and public integrity
- Strengthening financial investigation and prosecution of corruption, in particular in high risk sectors.
- Strengthening the exchange of information.

In this context it is good to point to the inter relationship between this Road Map, the Road Map on Administrative Reform, the Road Map for the Hellenic Court of Audit and the Road Map on Anti Money Laundering. TA is already provided in these areas, as well as in the areas of tax administration (with a focus on enhancing internal control and setting up a specific anti-corruption strategy for the revenue administration), health and public procurement. All these TA efforts incorporate aspects of direct relevance for the anti corruption framework. This is also the case for TA provided in the field of justice, since a more efficient and effective judicial system is a major asset against corruption.

This document outlines this road map and how EU Member States could provide technical assistance to Greece and this way contribute to the implementation of the earlier mentioned MoU.

2. Programme

2.1. Work stream 1: Setting up an overall national anti corruption strategy.

A. National anti corruption strategy

- ✓ Work on an Anti-Corruption Strategy. An example of a widely used framework for thinking about anti-corruption strategies includes the following main categories of actions:
 - Reducing the numbers of transactions vulnerable to corruption.
 - Reduce gains from corrupt transactions.
 - Increase probability of being caught.
 - Increase magnitude of penalties.
- ✓ Explore and advice on including in this national strategy how to strengthen ‘circles of defence’: inspection bodies within ministries (level 1), general inspection (level 2), law enforcement, prosecution and judiciary (level 3), parliament (level 4).
- ✓ Ensure ownership of all stakeholders and political backing for the national strategy by approval of the Parliament.
- ✓ Update the strategy on a continuous basis, discussing new measures and tools as appropriate.

Note 1: As an example of such a strategy for further discussion and development, a Framework for Analyzing Anti-Corruption Strategies is added. It includes examples of actions but is not yet clearly focussed on the different high risk topics (grand corruption) and sectors. See annex.

Note 2: It is helpful for such a strategy to make a distinction between the various forms of corruption (party financing, political and administrative corruption, “petty corruption”, military procurement, etc.) in order to choose and shape the appropriate mechanisms and procedures to fight each of them.

- ✓ Include in the strategy relevant measures as already agreed in the Road Map on Anti Money Laundering:
 - a. *Explore and advise on the possibility to introduce a prohibition of cash transactions above a certain amount focussed on either high risk sectors, types of transactions or clients.*
 - b. *Explore and advise on the possibility to introduce an obligation to incorporate the tax identification number in wire transfers.*
 - c. *Explore and advise on the use of data regarding the declared assets of 40.000 'politically exposed persons' and 'other persons' and identify approaches to match this information with the database containing information regarding suspicious transactions and available information regarding domestic politically exposed persons.*

- d. *Explore and advise on a change of the AML law to require financial institutions to apply enhanced due diligence to domestic politically exposed persons (PEP) in addition to already existing requirements for foreign PEPs.*
- e. *Explore and advise on the best way to set up a central registry of bank accounts, which is highly beneficial to support law enforcement and creates efficiency benefits for the financial institutions.*

B. Sector specific strategies

- ✓ Such a national strategy also takes into consideration the particular needs in high risk topics and sectors that seem to be vulnerable to corruption like tax administrations, national health services, public works, (military) procurement and contracts, entrepreneurial investment state loans and local government, and establishes the standards and principles on which the specific administrations / institutions should base their own efforts to enhance the fight against corruption regarding their own activities. For the detection of high risk sectors and for the purpose of keeping it updated there should be a clear risk assessment strategy.
- ✓ If not already covered by other Road Maps or technical assistance a focused sector specific risk assessment and understanding of corruption issues should be set up for certain individual sectors, agencies, and functions. This will provide the basis for concrete actions against corruption which while individually small can add up to significant progress in aggregate.

Note: for example the MoU already mentions concrete actions to be taken for the tax administration, like preparing a fully fledged anti corruption plan for the tax administration, reform of the financial inspections unit, activate an Internal Affairs Directorate, requirement for the FIU to audit annually at least 200 asset statements of tax official, establish procedures for the rotation of managers on a periodic basis and improve the system to protect whistle-blowers on a who report corruption.

- ✓ 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.

Note: The overall anti-corruption strategy intends to directly impact on EU revenues and the management of EU funds insofar as they are implemented by national authorities applying notably national public procurement rules. However, the specificities of the management and control framework for managing EU funds require a targeted assessment with a view to improving the set up and performance of these systems to tackle corruption and related fraud issues.

- ✓ Implement the sector specific strategy and develop a sound monitoring of the results.

2.2. Work stream 2: Strengthening coordination³, including via a national coordinator and / or via an independent corruption body.

- ✓ Explore and advise on strengthening coordination preferably via a Greek National Coordinator for Anti Corruption (and/or an independent central corruption agency). Independence could be institutionalised via either the Parliament (or as an independent body under the Supreme Court like the FIU). Full political support for either of the options is essential

³ Coordination in the context of a prosecution is of course up to the prosecutor.

- ✓ Explore and advise on strengthening coordination via the set up of a coordination committee with all relevant bodies directly or indirectly represented to prepare the national strategy. This could be linked to the existing coordination meeting on Anti Money Laundering by inviting some additional partners. As soon as there is a 'National Coordinator' appointed he or she will have the full individual responsibility and authority for the implementation of the national strategy and the Road Map. The coordination committee will be at his disposal as he or she deems appropriate.
- ✓ Explore and advise on strengthening coordination via the set up of an advisory group with representation of amongst others Transparency International and the Task Force for Greece. This advisory body should have a direct link to the coordination committee and being tasked with giving asked and unasked advice to the National Coordinator and the coordination committee.
- ✓ Mapping overall and individual responsibilities in the anti corruption network, to avoid overlap.
- ✓ Explore and advise on bringing the coordination between inspection and control bodies under the same umbrella.

2.3. Work stream 3: Strengthening prevention, awareness raising and public integrity

A. Prevention and awareness raising:

- ✓ Explore and advice on the introduction of regularly updated risk assessments.
- ✓ Explore and advice on the provision of tools and mechanisms to monitor anti corruption measure implementation.
- ✓ Explore and advice on the introduction of corruption screening mechanisms.
- ✓ Explore and advice on the development and further strengthening of internal control mechanisms.
- ✓ Explore and advice on effective mechanisms for prevention, detection and removal of conflict of interest and incompatibilities for all categories of public officials, including elected officials.
- ✓ Explore and advise on measures to ensure transparency of public expenditure, public contracts and budgetary process.
- ✓ Explore and advice on strengthening civil society participation, including empowerment of citizens.
- ✓ Explore and advice on the provision of monitoring tools and proceedings on anti-corruption related measures.
- ✓ Explore and advice on the way the independent media can play a role to tackle corruption.
- ✓ Explore and advice on an effective framework for transparency, supervision and sanctioning of political party financing.

B. Public Integrity:

- ✓ Explore and advice on monitoring of conflict of interest
- ✓ Explore and advice on strengthening reporting of corruption by public officials.
- ✓ Explore and advice on strengthening of the protection of whistleblowers
- ✓ Explore and advice on strengthening capacity and skills of internal control units / departments and enhance efficiency of disciplinary procedures and their final outcome.
- ✓ Explore and advice on introduction of public officials and integrity tests.
- ✓ Explore and advice on procedures or extension of the scope of the relevant existing legal provisions for giving and accepting gifts.
- ✓ Explore and advice on ethics and a code of conduct for public officials.

2.4. Work stream 4: Strengthening financial investigation and prosecution of corruption, in particular in high risk sectors.

- ✓ Train staff of Inspector General and the Office of the Commissioner General of the State, inspection bodies of ministries, SDOE, Financial Police, Financial Prosecutors and FIU in anti corruption investigations. Training of judges should also be considered.
- ✓ The training program consists of three levels. A general level to trigger identification skills of investigators for larger groups.
- ✓ 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.
- ✓ The third level consists of training on the job for a few hand picked professionals on particular topics and ongoing investigations.
- ✓ Coordinate investigations in high risk areas like tax, health and urban planning.
- ✓ Explore and advice on strengthening law enforcement institutional capacities and resources to proactively investigate and prosecute corruption and economic crime-related offences.
- ✓ Strengthen capacity between internal control mechanisms and law enforcement with a view to enhance notification rates for corruption offences or unjustified wealth.
- ✓ Explore and advice on the possibility of using inducement prizes to identify innovative solutions to reduce corruption.
- ✓ Explore and advice on the strengthening of the mechanisms for asset recovery.
- ✓ Explore and advise on the obligation of the Prosecutors to notify the inspection and control bodies (which referred the case to them) of the results of their investigation.

2.5. Work stream 5: Strengthening the exchange of information (partly the same measures as already agreed in the context of the Road Map on Anti Money Laundering but with a wider context).

- ✓ *Explore and advise on the best way to set up a central registry of bank accounts, which is highly beneficial to support law enforcement and creates efficiency benefits for the financial institutions.*
- ✓ *Explore and advise on the possibilities to give access to the tax audit platform Elenxis to the organisations involved in the anti corruption network.*
- ✓ *Strengthening the feedback given by the FIU by exploring the possibilities to exchange information, for example by concluding MoU's between the FIU and other participants in the anti corruption network*
- ✓ *Explore and advice on a central place /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 clearly the FIU. For reporting between (inspecting and investigating) authorities it might be helpful to consider bundling of information. The national coordinator or an independent anti corruption body could be such a place. This could also include platforms for efficient exchange of intelligence between law enforcement agencies.*
- ✓ *Drawing up typologies regarding the link between corruption and money laundering, including making use of the Financial Action Task Force Reports on Laundering the Proceeds of Corruption and Red Flag Indicators.*
- ✓ *Explore and advice on strengthening mechanisms for disclosure and verification of assets for all categories of public officials, including elected officials.*

2.6. Work stream 6: Strengthening of the legal framework.

- ✓ *Explore and advice on the introduction of a corruption proofing methodology.*
- ✓ *Explore and advise on improving the criminal legislation and criminal procedure concerning corruption related offences and white collar crime, including on aspects related to immunity of members of parliament and government.*
- ✓ *Explore and advise on introducing and enforcing the Greek Bribery Act.*
- ✓ *Explore and advice on improving the prosecutorial proceedings legal framework.*
- ✓ *Improving the timelines before justice is obtained, both in terms of duration of proceedings and statute of limitations.*
- ✓ *Giving priority to cases of corruption regarding civil servants and public officials in courts.*
- ✓ *Strengthening the administrative legal framework regarding sanctionability.*
- ✓ *Explore and advice on the recent withdrawal of the right for the Inspector General to appeal to disciplinary decisions when the case was not initiated by the Inspector General.*
- ✓ *Explore and advise on the recent withdrawal of the provision regarding anonymous complaints.*

- ✓ Explore and advise on the obligation of ministries and agencies to respond to observations and proposals formulated by inspection bodies and the Ombudsman.

3. An integrated approach

There is a need for a strategic vision of how the anti-corruption network can cooperate more closely to strengthen the fight against corruption. Workstream 2 is therefore of key relevance for success and should therefore start as soon as possible. It should be noted that the national strategy as formulated under work stream 1 could in practise consist of most measures as described under work stream 3, 4, 5 and 6. Introducing separate work streams could facilitate the implementation process afterwards.

The different work stream could be worked on and progress independently to a large extent. The process of this program could be organised along the following general lines. As a start a coordination committee should be set up with all relevant bodies directly or indirectly represented to prepare a national strategy. One way of dealing with this would be to make use of the existing coordination meeting on Anti Money Laundering. As soon as a Greek National Coordinator is appointed, he or she should have the full responsibility and authority for the implementation of the national strategy and the Road Map as a whole. The coordination committee would be at his disposal as he deems appropriate. The National Coordinator on anti corruption should chair this meeting.

In addition an advisory group could be set up with representation from amongst others Transparency International and the Task Force for Greece. This advisory body should have a direct link to the coordination committee via its chair. This advisory body should be tasked with giving asked and unasked advice to the National Coordinator and the coordination committee on all relevant issues.

Both the coordination committee and the advisory body should be supported by a full time highly qualified secretariat (2 persons).

The TFGR will facilitate and coordinate the program.

The exact timing of specific actions is flexible while depending on progress in other areas. If needed additional recommendations will be made during the process, for example as outcome of the evaluation mechanism. Therefore during the implementation of the aforementioned, amendment of the road map might be needed.

4. Proposed work plan.

Work stream 1: Setting up an overall national anti corruption strategy

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
SHORT-TERM REFORM					
Work on an Anti-Corruption Strategy. An example of a widely used framework for thinking about anti-corruption strategies includes the following main categories of actions			4 th quarter 2012	Coordination Committee + Advisory Body	
Such a strategy also takes into consideration the particular needs in high risk sectors like tax administration, health, etc.			4 th quarter 2012	Coordination Committee + Advisory Body	
Explore and advice on including in this national strategy how to strengthen 'circles of defence': inspection bodies within ministries (level 1), general inspection (level 2), law enforcement, prosecution and judiciary (level 3), parliament (level 4).			4 th quarter 2012	Coordination Committee + Advisory Body	
Ensure ownership of all stakeholders and political backing for the national strategy by approval of the Parliament.			4 th quarter 2012	Coordination Committee + Advisory Body	
Update the strategy on a continuous basis, discussing new measures and tools as appropriate			4 th quarter 2012 and onwards	Coordination Committee + Advisory Body	
Include in the strategy relevant measures as already agreed in the Road Map on Anti Money Laundering			4 th quarter 2012	Coordination Committee + Advisory Body	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
MEDIUM-TERM REFORM					
<p>Such a national strategy also takes into consideration the particular needs in high risk topics and sectors that seem to be vulnerable to corruption like tax administrations, national health services, public works, (military) procurement and contracts, entrepreneurial investment state loans and local government, and establishes the standards and principles on which the specific administrations / institutions should base their own efforts to enhance the fight against corruption regarding their own activities. 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>4th quarter 2012</p>	<p>Coordination Committee + Advisory Body</p>	
<p>If not already covered by other Road Maps or technical assistance a focused sector specific assessment and understanding of corruption issues should be set up for certain individual sectors, agencies, and functions. This will provide the basis for concrete actions against corruption which while individually small can add up to significant progress in aggregate.</p>			<p>3rd/4th quarter 2012</p>	<p>Coordination Committee + Advisory Body</p>	
<p>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>			<p>4th quarter 2012 - 4th quarter 2013</p>	<p>Coordination Committee + OLAF + Advisory Body</p>	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
Implement the sector specific strategy and develop a sound monitoring of the results			1 st quarter 2013 – 1 st quarter 2014	Coordination Committee	

Work stream 2: Strengthening coordination⁴, including via a national coordinator and / or via an independent corruption body.

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
SHORT-TERM REFORM					
Explore and advise on strengthening coordination preferably via a Greek National Coordinator for Anti Corruption (and/or an independent central corruption agency). Independence could be institutionalised via either the Parliament (or as an independent body like the FIU). Full political support for either of the options is essential			3 rd quarter 2012	TFGR	
Explore and advise on strengthening coordination via the set up of a coordination committee with all relevant bodies directly or indirectly represented to prepare the national strategy. This could be linked to the existing coordination meeting on Anti Money Laundering by inviting some additional partners. As soon as there is a 'National Coordinator' appointed he or she will have the full individual responsibility and authority for the implementation of the national strategy and the Road Map. The coordination committee will be at his disposal as he or she deems appropriate.			3 rd quarter 2012	TFGR	

⁴ Coordination in the context of a prosecution is of course up to the prosecutor.

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
Explore and advise on strengthening coordination via the set up of an advisory group with representation of Transparency International and the Task Force for Greece. This advisory body should have a direct link to the coordination committee and being tasked with giving asked and unasked advice to the National Coordinator and the coordination committee.			3 rd quarter 2012	TFGR	
Mapping overall and individual responsibilities in the anti corruption network, to avoid overlap			4 th quarter 2012	Coordination Committee + Advisory Body	
Explore and advise on bringing the coordination between inspection and control bodies under the same umbrella			4 th quarter 2012	Coordination Committee + Advisory Body	

Work stream 3: Strengthening prevention, awareness raising and public integrity

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
SHORT-TERM REFORM (prevention and awareness raising)					
Explore and advice on the introduction of regularly updated risk assessments			To be decided in the 4 th quarter 2012 in the context of the national strategy		
Explore and advice on the provision of tools and mechanisms to monitor anti corruption measure implementation.			To be decided in the 4 th quarter 2012 in the context of the	Coordination Committee + Advisory Body	

Road Map technical assistance – for Anti Corruption

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
			national strategy		
Explore and advice on the introduction of corruption screening mechanisms.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on the development and further strengthening of internal control mechanisms.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on effective mechanisms for prevention, detection and removal of conflict of interest and incompatibilities for all categories of public officials, including elected officials			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advise on measures to ensure transparency of public expenditure, public contracts and budgetary process			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on strengthening civil society participation, including empowerment of citizens.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on the provision of monitoring tools and proceedings on anti-corruption related			To be decided in the 4 th quarter 2012 in the	Coordination Committee + Advisory Body	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
measures.			context of the national strategy		
Explore and advice on the way the independent media can play a role to tackle corruption			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on an effective framework for transparency, supervision and sanctioning of political party financing			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
SHORT TERM REFORM (public integrity)					
Explore and advice on strengthening reporting of corruption by public officials.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on strengthening of the protection of whistleblowers.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on strengthening capacity and skills of internal control units / departments and enhance efficiency of disciplinary procedures and their final outcome			To be decided in the 4 th quarter 2012 in the context of the national	Coordination Committee + Advisory Body	

Road Map technical assistance – for Anti Corruption

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
			strategy		
Explore and advice on introduction of public officials and integrity tests.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on procedures for giving and accepting gifts.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on monitoring of conflict of interest.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on ethics and a code of conduct for public officials			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	

Work stream 4: Strengthening financial investigation and prosecution of corruption, in particular in high risk sectors

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
SHORT TERM REFORM					
Train staff of Inspector General and the office of the commissioner general of the state, inspection bodies of ministries, SDOE, Financial Police, Financial Prosecutors and FIU in anti corruption investigations. Training of judges should also be considered.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee EU MS?	
The training program consists of three levels. A general level to trigger identification skills of investigators for larger groups.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee EU MS?	
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.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee EU MS?	
The third level consists of training on the job for a few hand picked professionals on particular topics and ongoing investigations.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee EU MS?	
Coordinate investigations in high risk areas like tax, health and urban planning.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee	

Road Map technical assistance – for Anti Corruption

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
Explore and advice on strengthening law enforcement institutional capacities and resources to proactively investigate and prosecute corruption and economic crime-related offences.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Strengthen capacity between internal control mechanisms and law enforcement with a view to enhance notification rates for corruption offences or unjustified wealth.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on the possibility of using inducement prizes to identify innovative solutions to reduce corruption.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on the strengthening of the mechanisms for asset recovery			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advise on the obligation of the Prosecutors to notify the inspection and control bodies (which referred the case to them) of the results of their investigation			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
MEDIUM-TERM REFORM					

Work stream 5: Strengthening the exchange of information (partly the same measures as already agreed in the context of the Road Map on Anti Money Laundering but with a wider context).

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
SHORT-TERM REFORM					
<i>Explore and advise on the best way to set up a central registry of bank accounts, which is highly beneficial to support law enforcement and creates efficiency benefits for the financial institutions.</i>			To be decided in the 4 th quarter 2012 in the context of the national strategy	Road Map AML	
<i>Explore and advise on the possibilities to give access to the tax audit platform Elenxis to the organisations involved in the anti corruption network.</i>			To be decided in the 4 th quarter 2012 in the context of the national strategy	Road Map AML	
<i>Strengthening the feedback given by the FIU by exploring the possibilities to exchange information, for example by concluding MoU's between the FIU and other participants in the anti corruption network</i>			To be decided in the 4 th quarter 2012 in the context of the national strategy	Road Map AML	
Explore and advice on a central			To be decided	Coordination Committee	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
place /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 clearly the FIU. For reporting between (inspecting and investigating) authorities it might be helpful to consider bundling of information. The national coordinator or an independent anti corruption body could be such a place.			in the 4 th quarter 2012 in the context of the national strategy	+ Advisory Body	
Drawing up typologies regarding the link between corruption and money laundering, including making use of the Financial Action Task Force Reports on Laundering the Proceeds of Corruption and Red Flag Indicators.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + EU MS?	
Explore and advice on strengthening mechanisms for disclosure and verification of assets for all categories of public officials, including elected officials			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + EU MS?	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
MEDIUM-TERM REFORM					

Work stream 6: Strengthening of the legal framework

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
SHORT-TERM REFORM					
Explore and advice on the introduction of a corruption proofing methodology.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advise on improving the criminal legislation and criminal procedure concerning corruption related offences and white collar crime, including on aspects related to immunity of members of parliament and government.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on improving the prosecutorial proceedings legal framework.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advise on introducing and enforcing the Greek Bribery Act			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Improving the timelines that justice is obtained, both in terms of duration of proceedings and statute of limitations.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Giving priority to cases of corruption regarding civil servants and public officials in courts.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
			strategy		
Strengthening the administrative legal framework regarding sanctionability.			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advice on the recent withdrawal of the right for the Inspector General to appeal to disciplinary decisions when the case was not initiated by the Inspector General			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advise on the recent withdrawal of the provision regarding anonymous complaints			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	
Explore and advise on the obligation of ministries and agencies to respond to observations and proposals formulated by inspection bodies and the Ombudsman			To be decided in the 4 th quarter 2012 in the context of the national strategy	Coordination Committee + Advisory Body	

Main objective	Action required	Type	When	Lead Agency (Funding Source)	Composition
MEDIUM-TERM REFORM					

Annex: A Framework for Analyzing Anti-Corruption Strategies

One widely used framework for thinking about anti-corruption strategy is based on a minimalist approach to government, which links corruption to monopoly in some activity or its regulation, the scope for discretion on the part of government officials, and (negatively) the degree of accountability of officials. In this regard, a framework for analyzing anti-corruption strategies would include the following main categories of actions: (i) reducing the number of transactions vulnerable to corruption; (ii) reducing the gains from corrupt transactions; (iii) increasing the probability that those who are corrupt get caught; and (iv) increasing the magnitude of penalties for corruption.

Reduce Number of Corrupt Transactions	Reduce Gains from Corrupt Transaction	Increase Probability of Being Caught	Increase Magnitude of Penalties
Change bureaucratic culture / streamline services / introduce competition for service provision / decentralize	Change bureaucratic culture (results-oriented; ethics and leadership)	Change civil service rules (asset declaration; protection of whistle blowers; rules for promotion and rotation)	Change bureaucratic culture (results-oriented; ethics and leadership) / Increase disciplinary penalties
Create / raise public service standards	Rationalize public service salaries		
Reduce public employment / public sector size			
Liberalize financial sector / other economic reform (e.g. privatization)	Economic reform (more competitive environment)		Laws and regulations with penalties (civil service, procurement, etc.)
Increase transparency (financial management; procurement; assets) and reporting	Adjust procurement rules; scale down individual projects	Improve financial management, transparency, control framework, reporting	
		Oversight (Parliament; external auditor; independent media; etc.)	Popular pressure (public opinion surveys; public awareness seminars; political system; independent media)
Introduce and enforce penalties for corruption		Strong central Anti corruption agency	
Reform political processes		Reinforce Judicial independence, rule of law	Capable judicial system for prosecution

Some general measures

- ✓ Delegate responsibilities and manpower by agency or departments in accordance with real needs and rational criteria (New organizational charts with organizational development plan)
- ✓ Privatize those units, which are not imperium and fiscus, without the state losing its regulatory and inspective role
- ✓ Reduce bureaucracy and continually simplify red tape e.g. transaction handling by systems like “one’s man job” or “one stop shop” where feasible.
- ✓ Continuously enhance transparency of the administrative action
- ✓ Prohibit civil servants and state officials from serving in their area of origin
- ✓ Establish mobility of human resources within the civil service
- ✓ Establish a salary system for civil servants, with merit criteria linked to productivity
- ✓ Effectively assess public institutions and human sources based on goals that will be set as a part of upcoming strategic plans. Increase Probability of Being Caught
- ✓ Shorten lengthy proceedings by improving the timelines.
- ✓ Give priority to examine cases of corruption regarding civil servants and public officials