

GRECO: Fifth Round Evaluation Report on Greece



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News

On 3 January 2022, GRECO published its [fifth round evaluation report on Greece](#). The on-site visit by the evaluation team took place in June 2021. The focus of this evaluation round is on the effectiveness of the frameworks currently in place to prevent corruption among persons with top executive functions (PTEFs), e.g. ministers, state secretaries, and political advisers as well as members of the police. The evaluation focuses particularly on issues of conflicts of interest, the declaration of assets, and accountability mechanisms (for other reports on this evaluation round → [eu-crim 1/2021, 40-42](#) with further references).

Greece has been a member of GRECO since 1999. The country implemented all recommendations in the first evaluation round, 50% in the second round, and 70% in the third round. The compliance procedure for the fourth round on corruption prevention in respect of parliamentarians, judges, and prosecutors is still in progress, with 58% of the recommendations fully, 26% partly, and 16% not implemented so far.

The perception of corruption in Greece remains high, although indicators have shown a gradual improvement in recent years. According to the Corruption Perceptions Index (CPI) published by Transparency International, Greece ranked 59th out of 180 countries in 2020. Its score was 50 (out of a total score of 100, where 0 corresponds to a high level of corruption and 100 to a low level). According to the 2019 special Eurobarometer, 95% of respondents believe that corruption is widespread in Greece (EU average: 71%), 91% have a strong perception of corruption in public institutions (EU average: 70%), and 9% have experienced or seen corruption (EU average: 5%). 58% of the respondents believe that bribery and abuse of power are widespread among politicians, and companies seem rather pessimistic about the criminal justice response to corruption. 81% of respondents believe that bribery is widespread in the healthcare system (EU average: 27%), in line with a recent corruption case that called into question the integrity of several public leaders under investigation for accepting bribes from the Swiss pharmaceutical company Novartis in exchange for patronage.

In 2019, the downgrading of the offence of bribery of public officials from a felony to a misdemeanour, which allowed for more lenient criminal sanctions, was vehemently criticised; the offence was subsequently reclassified as a felony. Notwithstanding this, GRECO launched an Article 34 procedure on 21 June 2019 – a procedure that can be initiated in exceptional cases where reliable information on institutional reforms, legislative initiatives, or procedural changes indicates a potential serious breach of the CoE's anti-corruption standards. In its *ad hoc* report on Greece, GRECO subsequently made four specific recommendations in this respect (→ [eucriM 4/2019, 248-249](#)). The Rule 34 procedure was terminated on 3 December 2021, following significant improvements to the Greek Penal Code (Law 4855/2021), largely in line with GRECO's recommendations.

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Executive power in Greece is shared between the President of the Hellenic Republic (mainly with a representative function) and the government, which is the actual holder of executive power. In this context, GRECO recommends that greater clarity be provided on the status of political advisers (ministerial associates and special advisers); according to the anti-corruption framework that applies to them, they are held to the highest standards of integrity as regards rules of conduct, conflicts of interest, financial disclosure obligations, etc. In addition, for the sake of greater transparency, the names, functions, and any remuneration (for tasks performed for the government) of political advisors, as well as information on potential ancillary activities, is disclosed in a way that provides for easy, appropriate public access online.

The recently modernised internal control and financial disclosure systems are essential tools to prevent corruption of high-level officials at the central level. In addition, the accountability framework for incumbent and former ministers has been significantly strengthened following constitutional amendments in 2019, including immunity provisions. Digitalisation has led to notable improvements in transparency and public consultation mechanisms. Nevertheless, proper implementation of access to information on request remains a challenge. Similarly, further efforts are needed to better ensure meaningful stakeholder involvement at earlier stages of decision-making processes and to monitor external interventions. Following the on-site visit, new lobbying rules were introduced in September 2021 (Law No 4829/2021), the effectiveness of which will need to be proven in practice.

The establishment of the National Transparency Authority (NTA), which has significantly increased cooperation and coordination between the different audit authorities and inspection bodies, marks a milestone in a more holistic approach to anti-corruption policy. The NTA aims to strengthen the national integrity and accountability framework by conducting investigations and audits, developing strategies to prevent and combat corruption, and by raising awareness. The NTA is also responsible for implementing the National Anti-Corruption Action Plan (NACAP), which has been the guiding policy document in the fight against corruption since 2013 – a new version is currently being prepared for the period 2022-2025.

The NTA encourages the development of codes of conduct that are adapted to the nature, challenges, and day-to-day operations of public sector bodies. Pilot projects are underway to establish integrity officers as an institution in individual ministries. At the time of the visit, however, it was not completely clear whether PTEFs would be able to turn to these officers in cases involving ethical dilemmas. Therefore, GRECO suggests further efforts to promote and raise awareness of ethics and integrity issues at the central level.

The supervision of financial disclosure is shared between different institutions, and some initiatives have already been taken in order to streamline methodologies. Nevertheless, more could be done to maximise synergies and to enhance the exchange of information on the best practices of and experience gained by the responsible bodies.

GRECO recommends reviewing the post-employment regime in order to assess its adequacy; the regime could also be strengthened by broadening its scope in respect of PTEFs. The report calls for further streamlining and strengthening of oversight of the declarations of assets and financial interests of PTEFs.

In the area of law enforcement, the report calls for progress in the prevention of police corruption, which was missing in the previous NACAP. Therefore, the NACAP 2022-2025 is to include an anti-corruption regulation for the police, in particular regarding the disciplinary system. The report identifies the working conditions of police officers and effective compensation for overtime as priority areas for improvement. The low proportion of female police officers (14%) is also a major issue, and GRECO calls for dedicated measures to strengthen the representation of women at all levels in the police force.

Although the police have a code of ethics, officers should participate in awareness-raising measures targeted towards their obligations as regards standards of conduct. They should also have access to targeted confidential counselling on ethical and integrity matters.

GRECO recommends updating the code of ethics for the police in order to address current policing challenges. It should include detailed guidance on integrity matters (conflicts of interest, handling of gifts, misuse of information, abuse of public resources, etc.). The professional training measures (initial and in-service) for police officers on ethics are to be further developed, taking into consideration the specificity of their duties and vulnerabilities – with a practice-oriented focus.

A single, realistic, and feasible policy on parallel employment and post-employment may also be necessary, e.g. establishing unequivocal criteria for permissible secondary activities and streamlining the authorisation process to render it clear, timely, and effective. Rules on the employment of police officers in the private sector after they leave the force also deserve further attention.

The framework for oversight and accountability on the part of the police needs to be strengthened. Further safeguards are necessary to guarantee the objectivity of the investigation and the impartiality of the investigating body and to ensure that they are perceived as such by the public in a sufficiently transparent manner. Lastly, the report calls for all necessary measures to be taken to facilitate the reporting of corruption, including targeted measures to strengthen the protection of whistleblowers within the police by guaranteeing their confidentiality, as appropriate.

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