

Independent Reporting Mechanism (IRM) Progress Report 2014-2015: Greece

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Executive Summary

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Independent Reporting Mechanism (IRM) Second Progress Report 2014–2015

Following the debt crisis, government instability stalled implementation of the Greek action plan. The commitments, focused on access to information and parliamentary transparency, were not sufficiently detailed to lead to meaningful reforms. The action plan tackled key areas such as taxation and open data, but the next action plan could include key national issues such as healthcare and the pension system.

The Open Government Partnership (OGP) is a voluntary international initiative that aims to secure commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. The Independent Reporting Mechanism (IRM) carries out a review at the mid and end point of the national action plan for each OGP-participating country.

Greece began its formal participation in October 2011. The Ministry of Interior and Administrative Reconstruction is the institution responsible for the development and implementation of Greece's national action plan. The Department of Transparency, Open Government and Innovation within the Ministry coordinates open government policies across the public administration.

The Greek debt crisis continues to affect political stability with multiple cabinet reshuffles, the election, resignation, and reelection of the Prime Minister, and snap elections taking place during the implementation period. All non-debt-related domestic reforms have been postponed and the government has not been able to fully engage in OGP activities.

OGP PROCESS

Countries participating in the OGP follow a process for consultation during development and implementation of their OGP action plan.

Overall, Greece improved the quality of its public consultation, although more work is needed to improve collaboration with civil society. Advanced notice of seven days was provided for first online stakeholder consultation, but no public announcements were made for later meetings and workshops that were invitation-only. Stakeholders found the consultations to be meaningful, but criticized the government for insufficient notice, not opening activities to all interested stakeholders, and a lack of shared decision making power on the action plan content. A draft action plan for public comment was made available online for five weeks and a summary of comments was published.

In December 2014, the government held an open call for a permanent cooperation committee to perform the tasks of a permanent consultation forum. While one meeting was held during the implementation phase, a fully operational forum does not exist yet.

At the time of writing the report, the government had not published a self-assessment report.

At a glance

Member since:	2011
Number of commitments:	19
Number of milestones:	41

Level of Completion:

Completed:	1 (5%)
Substantial:	3 (16%)
Limited:	10 (53%)
Not started:	5 (26%)

Timing:

On schedule:	4 (21%)
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Commitment Emphasis:

Access to information:	16 (84%)
Civic participation:	4 (21%)
Accountability:	1 (5%)
Tech & innovation for transparency & accountability:	10 (53%)

Number of Commitments that Were:

Clearly relevant to an OGP value:	17 (89%)
Of transformative potential impact:	1 (5%)
Substantially or completely implemented:	4 (21%)

All three (☆): 0

This report was prepared by Alexandros Melidis, Athanasios Deligiannis, and Thanasis Priftis of Openwise.

COMMITMENT IMPLEMENTATION

As part of OGP, countries are required to make commitments in a two-year action plan. The Greek action plan is divided into four themes that include increasing public participation, open government data, integrity and accountability, and open parliament. The four themes contain 17 commitments comprising 41 milestones. The following tables summarize for each commitment the level of completion, potential impact, and whether it falls within Greece's planned schedule. The Greek plan largely focused on internal improvements to data release processes and parliamentary openness. While the commitments represented good first steps in improving their respective policy areas, implementation suffered due to political and economic instability. Greece completed one of its 19 commitments.

The Greek action plan contained no starred commitments. Note that the IRM updated the star criteria in early 2015 to raise the bar for model OGP commitments. In addition to the criteria listed above, the old criteria included commitments that have moderate potential impact. Under the old criteria, Greece would have received one additional star (commitment 2.1). See (<http://www.opengovpartnership.org/node/5919>) for more information.

Table 1: Assessment of Progress by Commitment

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION			TIMING
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	
Theme 1: Boosting Public Participation								
1.1. Transparency Program Upgrade								On schedule
1.1.1. Issue guidelines								On
1.1.2. Integrate public bodies in new system								On
1.1.3. Data and promotion study								On
1.2. Public Participation in Decision Making								Behind schedule
1.2.1. Legislative action								Behind
1.2.2. Operational and technical improvements								On
1.2.3. Training and mobilization plan								On
Theme 2: Open Government Data								
2.1. Public Sector Information (PSI) Directive on Reuse of Data								On schedule
2.2. Regulatory Amendments on Open Data								Behind schedule
2.2.1. Open data provision guide								On
2.2.2. Open data on the design of IT projects								Behind
2.2.3. Open data licensing framework								Behind
2.3. Central Open Data Platform								Behind schedule

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION			TIMING
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	
2.3.1. Sign implementation contract								Behind
2.3.2. Implementation study and platform pilot phase								Behind
2.3.3. Platform rollout								On
2.4. Open Geospatial Data								Behind schedule
2.4.1. Geospatial registry and EKCHA SA								Behind
2.4.2. OKXE SA archive in digital format								On
2.4.3. Environmental protection areas data								On
2.5. Open Cultural Data								Behind schedule
2.5.1. Legal amendments								Behind
2.5.2. National Digital Archaeological Cadastral Registry								On
2.5.3. Interoperability services								On
2.6. Open Data for Offshore Companies								Behind schedule
2.7. Open Public Sector Datasets								Behind schedule
2.7.1. Taxation datasets								Behind
2.7.2. Public procurement datasets								Behind
2.7.3. Commerce datasets								Behind
Theme 3: Integrity and Accountability								
3.1. Open Public Sector Job Posts								Behind schedule
3.1.1. Regulatory interventions								Behind
3.1.2. Operational and technical changes								Behind
3.2. Public Administration Organizational Chart								Behind schedule
3.2.1. Organizational chart IT system								On
3.2.2. Organizational charts for Transparency Initiative								On
3.2.3. Organizational charts for public administration								Behind
3.3. Open Government Policy								On schedule
3.4. Strategic Alliance Against Corruption								Behind schedule

COMMITMENT SHORT NAME	POTENTIAL IMPACT				LEVEL OF COMPLETION			TIMING
	NONE	MINOR	MODERATE	TRANSFORMATIVE	NOT STARTED	LIMITED	SUBSTANTIAL	
3.4.1. Study on inspectorate bodies								Behind
3.4.2. Study on strategic alliance								On
Theme 4: Open Parliament Commitments								
4.1. Track Changes on Bills								On schedule
4.1.1. Review legislative information flow								On
4.1.2. XML standard for legislative documents								On
4.1.3. Legislative document handling system								On
4.2. “Parliamentary Transparency” Section of Parliament’s Website								Behind schedule
4.2.1. “Parliamentary Transparency” website visitor experience								Behind
4.2.2. Improvements to “Parliamentary Transparency” section								On
4.3. Parliament Website and New Standards								Behind schedule
4.3.1. Review study of Parliament website improvements								On
4.3.2. Parliament website improvements								Behind
4.4. Open Historical Parliamentary Data								Behind schedule
4.4.1. Digitize public historical Parliament material								On
4.4.2. Standards and public access to Parliament e-books								Behind
4.5. Parliament Social Media Policy								Behind schedule
4.5.1. Social media use goals and models								Behind
4.5.2. Content management teams and content automation								Behind
4.6. Online Provision of Exhibitions								Behind schedule
4.6.1. Adopt digital exhibitions platform								Behind
4.6.2. Digital exhibitions platform								Behind

Table 2: Summary of Progress by Commitment

NAME	SUMMARY OF RESULTS
Theme 1: Boosting Public Participation	
<p>I.1. Transparency Program Upgrade</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>This commitment provides efficient access to government-held information on implementation of a new Transparency Program, including legislative changes and technical updates to the online platform. These activities represent a minor but important step towards greater accountability. The government has updated the transparency policies and the program's online platform for the systematic publication of all decisions from the public administration, offering a more user-friendly platform. However, the legislation exempts certain forms of budgetary information from being published immediately on the platform, and the extent to which public officials are using the new platform is unclear because not all government bodies have fully adopted it. To strengthen the updated program, the Greek Government should (1) not make exemptions to the updated legislation, (2) explore ways to continue improving the interface, and (3) define concrete awareness-raising activities.</p>
<p>I.2. Public Participation in Decision Making</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Minor • Completion: Limited 	<p>The government aims to increase public awareness and civic participation by improving the online consultation processes and consolidating the legal framework. However, the commitment language is vague and addresses minor, technical improvements. Milestone I.2.1 has not been started. Limited progress has taken place on operational and technical improvements to the consultation process (I.2.2) and technical support on implementing consultations (I.2.3), but there is no official plan for training, raising awareness, or citizens' mobilization. There remains no adequate mechanism for Parliament to adopt the findings of the online consultation processes. The IRM researchers recommend establishing a follow-up mechanism that allows for stakeholders to track how their inputs are incorporated and developing a formal citizen engagement strategy.</p>
Theme 2: Open Government Data	
<p>2.1. PSI Directive on Reuse of Data</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Complete 	<p>These commitments introduce a modern legal framework for open data that fulfills European Union requirements for an open by default policy, which represents an important step forward for enabling public access to information. Commitment 2.1 has been completed with the integration of EU Directive 2013/37/EU into existing Greek law, eliminating regulatory barriers on the release of public sector data.</p>
<p>2.2. Regulatory Amendments on Open Data</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Limited 	<p>Additional work remains on commitment 2.2, which focuses on implementing the revisions. A guide on open data provision is substantially completed (2.2.1), but open data provisions on the design of IT projects (2.2.2) and the disclosure of the licensing framework (2.2.3) have not been started. Public officials have struggled with the implementation of the open by default policy. The IRM researchers recommend the government reevaluate its open data strategy and take actions that address the policy's structural issues.</p>
<p>2.3. Central Open Data Platform</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Limited 	<p>This commitment standardizes processes for automatic collection of government data for public release, representing an important step to enabling access to information. The government has not signed an implementation contract (2.3.1), developed an implementation study (2.3.2.), or established a system for the automatic collection of public information (2.3.3). Public datasets have been uploaded manually in various file formats to a central government portal, but a significant amount of data files do not have machine-readable formatting capabilities. Further engagement with stakeholders would help to improve the portal so that it addresses users' needs.</p>
<p>2.4. Open Geospatial Data</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Minor • Completion: Limited 	<p>To increase government accountability, this commitment streamlines the release of geospatial datasets in open data format and with corresponding licenses. These activities represent a minor incremental advance in the opening geospatial data. The government has provided geospatial datasets only in PDF format and has not indicated a plan to release any additional data in machine-readable format. Moving forward, the IRM researchers recommend the Ministry of Environment coordinate with civil society experts to formulate a time-bound plan for releasing geospatial data in open, machine-readable format.</p>

Table 2: Summary of Progress by Commitment cont.d

<p>2.5. Open Cultural Data</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Limited 	<p>This commitment aims to enhance citizens' accountability role in public policy making by releasing datasets on culturally significant artifacts (cultural data). Although amendments to the legal framework regulating the publication of cultural data have not been introduced (2.5.1), the government has established an integrated information system for the publication of cultural heritage information (2.5.2). The IRM researchers suggest the Ministry of Environment carry out public consultations for the formulation of legal amendments.</p>
<p>2.6. Open Data for Offshore Companies</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Not started 	<p>The government aims to curb tax evasion and financial fraud in Greece with the release of data on offshore companies. However, the commitment language does not assign a responsible government agency for implementation. Releasing this data is an important first step, but the government would need to elaborate clear activities that either enhance public monitoring of offshore companies or include an enforcement mechanism to deter illegal conduct. No progress has been made on this commitment. The IRM research team recommends better linking the publication of this data to policy reform outcomes and creating a monitoring agency to oversee implementation.</p>
<p>2.7. Open Public Sector Datasets</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Not started 	<p>This commitment seeks to identify trends in areas of tax evasion and financial fraud through the proactive publication of datasets on taxation, public procurement, and commercial activities. In the context of the Greek financial crisis, these datasets are critical for stakeholders to monitor government reform efforts. Implementation of this commitment was not assigned to a specific government agency and therefore has not been started. The IRM researchers recommend identifying a responsible institution and connecting the release of datasets to specific reform efforts.</p>
<p>Theme 3: Integrity and Accountability</p>	
<p>3.1. Open Public Sector Job Posts</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Transformative • Completion: Not started 	<p>This commitment aims to reduce cronyism and increase public accountability by mandating the use of an existing public appointments platform to advertise high-ranking public sector positions. Commitment activities include potentially transformative reforms to mandate transparency and accountability in the hiring of high-ranking public officials. However, implementation of this commitment has not started. Moving forward the IRM researchers recommend (1) involving civil society in pushing for the required institutional changes to fully implement this commitment (2) drafting legislation codifying hiring processes for high-ranking officials, and (3) adopting a comprehensive Code of Practice for Public Appointments, overseen by an independent commissioner.</p>
<p>3.2. Public Administration Organizational Chart</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>This commitment seeks to create uniform standards for the publication of public agencies' organizational charts in open and machine-readable format. In the past, they were published on an ad hoc basis and displayed in a variety of formats. This commitment represents a small, but important step towards greater public accountability by allowing stakeholders to easily access information on the organizational structure of agencies and identify "bloat" in the civil service. However, the charts lack detail beyond hierarchical relationships, which limits the overall impact of this commitment. This commitment is substantially fulfilled as organizational charts are automatically generated by the Diavgeia information system. Recommendations include involving stakeholders to ensure that the charts and similar data visualization include information relevant to stakeholders' interests.</p>
<p>3.3. Open Government Policy</p> <ul style="list-style-type: none"> • OGP value relevance: Unclear • Potential impact: Moderate • Completion: Limited 	<p>This commitment aims to establish permanent institutions in all ministries with a legal mandate to coordinate implementation and to enforce open government policies. Progress has been limited. A single Transparency, Open Government and Innovation Department with the Ministry of Interior and Administrative Reconstruction was created with monitoring and coordinating, but with limited interministerial enforcement powers. This commitment addresses an internal administrative issue and therefore is not directly relevant to OGP values. However, the IRM researchers found that this commitment could have moderate potential impact as the creation of dedicated open government units with enforcement powers would insulate the OGP process from political upheaval and ensure continuity in action plan implementation. The IRM researchers recommend forming an independent interministerial project management team to "own" individual commitments and to coordinate OGP implementation.</p>

Table 2: Summary of Progress by Commitment cont.d

<p>3.4. Strategic Alliance Against Corruption</p> <ul style="list-style-type: none"> • OGP value relevance: Unclear • Potential impact: Minor • Completion: Limited 	<p>This commitment aims to study the effectiveness of inspectorate bodies and the development of a strategic alliance to fight corruption. The scope of the commitment is limited to conducting these studies and represents a minor step towards addressing the issues of corruption and the role of inspectorates. During the implementation period, the responsibility to address corruption cycled through multiple agencies, which hindered progress on this commitment. The government has not approved implementation of the studies as described in the action plan. However, ad hoc meetings to promote creative uses of open data in tackling corruption were held between the Ministry of Interior and Administrative Reconstruction and inspectorate bodies. This took place in the context of an unrelated project, YourDataStories, but has increased interagency cooperation. Moving forward, the IRM researchers suggest adapting the commitment activities to match priority areas identified by the new implementing agency, the Ministry of Justice.</p>
Theme 4: Open Parliament Commitments	
<p>4.1. Track Changes on Bills</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Minor • Completion: Substantial 	<p>Parliament developed these as part of their individual action plan, which focuses on streamlining parliamentary functions. The main goal is to adopt a legislative document handling system for monitoring revisions to drafts. These changes would allow for public participation during the early drafting stages and would increase access to information and transparency in legislative activities. A pilot was conducted for a new system of publishing draft legislation in machine-readable format and tracking changes to the document (4.1.1). Additional work is needed to adopt an international open standard XLM (4.1.2) and to implement fully the new system (4.1.3). For commitment 4.2, the IRM researchers verified the upgrading of the “Parliamentary Transparency” section of the website. However, stakeholders note that no outside consultation was held on the website revisions, and the lack of a mandate to track and publish changes to documents undermines the overall utility of the website. To make this new system effective in increasing transparency and participation in the legislative process, the IRM researchers recommend including stakeholder consultation activities and a legal mandate that would require the Parliament to publish all decisions.</p>
<p>4.2. “Parliamentary Transparency” Section of Parliament’s Website</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Limited 	
<p>4.3. Parliament Website and New Standards</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Limited 	<p>These commitments were developed by the Parliament as part of their individual action plan, and they streamline parliamentary functions. These two commitments aim to increase access to information by improving the functionality of the Parliament’s existing online platforms (4.3) and increasing the amount of parliamentary data made available to the public (4.4). The activities have a moderate potential impact because they seek to bridge the communication and information gap between the Parliament and citizens. Aside from the completion of a study of Parliament’s website (4.3.1), these commitments achieved limited overall completion. This is due in part to the fact that a crucial intermediary step—the adoption of an international data-formatting standard (commitment 4.1)—has not been completed. Additionally, the release of historical parliamentary data (4.4) is restricted by a Greek Data Protection Agency decision requiring all legal text to be made anonymous before publication. To implement these commitments while addressing larger issues of data openness and accessibility, the IRM researchers recommend collaborating with CSOs, such as Open Knowledge Foundation Greece, which have relevant experience and expertise in this area.</p>
<p>4.4. Open Historical Parliamentary Data</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Minor • Completion: Limited 	
<p>4.5. Parliament Social Media Policy</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Moderate • Completion: Not Started 	<p>The Hellenic Parliament seeks to further engage with stakeholders by enhancing its social media policy and providing online exhibitions to promote democracy and parliamentarianism. A unified strategy with overarching goals for social media use, overseen by content management teams, serves as a feedback mechanism for citizens. Also, the provision of online exhibitions would raise awareness of the Parliament’s duties. Due to the Parliament’s limited human and economic resources, these commitments have not been started. The IRM research team recommends adopting open source software and crowdsourced inputs to jumpstart progress on commitment 4.6.</p>
<p>4.6. Online Provision of Exhibitions</p> <ul style="list-style-type: none"> • OGP value relevance: Clear • Potential impact: Minor • Completion: Not Started 	

RECOMMENDATIONS

Greece continues to struggle to recover from the global economic crisis of 2008, and the Greek Government has been primarily focused on reaching financial stability and tackling the issue of the Greek international debt. As a result, all non-debt-related domestic reforms have been postponed and the Government of Greece has not been able to engage fully in action plan-related activities. After the September 2015 elections, the political climate has stabilized, but it remains to be seen if work on the commitments will continue through the end of the implementation cycle. While the action plan addresses issues related to the origins of the Greek financial crisis, more work has to be done to address widespread issues of corruption and domestic reforms that are not limited to the financial crisis. Based on the findings in the progress report, the IRM researchers made the following five specific, measurable, accountable, relevant, and time bound (SMART) recommendations for improving the OGP process in Greece.

TOP FIVE 'SMART' RECOMMENDATIONS

1. Improve ownership of the OGP action plan by appointing a relevant authority with increased enforcement powers for the overall coordination of the OGP action plan. It should be an independent role, following the model of the State Secretary for Public Revenue.
2. To ensure meaningful stakeholder participation in the development and implementation of the action plan, the government should coordinate with Parliament to initiate a legal mandate for open government and a permanent dialogue mechanism for public consultation.
3. Support ongoing efforts to connect the release of datasets with specific reform efforts in critical policy areas.
4. Commitments should be written in such a way that they clearly elaborate *which* policy targets they intend to achieve and *how* these activities will lead to reforms in the policy area.
5. The scope of the action plan should include other policy areas that would benefit from more openness and open government solutions such as healthcare, the pension system, and undeclared workers.

Eligibility Requirements 2014: To participate in OGP, governments must demonstrate commitment to open government by meeting minimum criteria on key dimensions of open government. Third-party indicators are used to determine country progress on each of the dimensions. For more information, visit: <http://www.opengovpartnership.org/how-it-works/eligibility-criteria>

Openwise accompanies business, government, and civil society organizations in redefining their mission, processes and impact with the transformative power of openness. It was founded in 2014 by a multidisciplinary team with many years of expertise in the fields of Public Policy, Communications, Open Technologies, Social Research, Multimedia Content Strategy, Transparency and Participation.

The Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.

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I. National participation in OGP

History of OGP participation

The Open Government Partnership (OGP) is a voluntary, multistakeholder international initiative that aims to secure concrete commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP provides an international forum for dialogue and sharing among governments, civil society organizations, and the private sector, all of which contribute to a common pursuit of open government.

To participate in OGP, governments must exhibit a demonstrated commitment to open government by meeting a set of minimum performance criteria on key dimensions of open government that are particularly consequential for increasing government responsiveness, strengthening citizen engagement, and fighting corruption. Indicators produced by organizations other than OGP are used to determine the extent of country progress on each of the dimensions. See Section IX on eligibility requirements for more details.

All OGP-participating governments develop OGP country action plans that elaborate concrete commitments over an initial two-year period. Action plans should set out governments' OGP commitments, which move government practice beyond its current baseline. These commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area.

Greece began its formal participation in October 2011, after the former Vice Minister of Administrative Reconstruction Pantelis Tzortzakis declared the country's intention to join. Greece developed its second national action plan from February 2014 through June 2014. The effective start date for the action plan submitted in June 2014 was officially 1 July 2014 for implementation through 30 June 2016. This midterm progress report covers the first year of implementation of this period, from 1 July 2014 to 30 June 2015.

In accordance with OGP requirements, the Independent Reporting Mechanism (IRM) of OGP has partnered with Openwise, an independent and local organization in charge of carrying out the evaluation of the development and implementation of Greece's second action plan. It is the aim of the IRM to inform ongoing dialogue around development and implementation of future commitments in each OGP participating country. Methods and sources are further explained in this report's methodological annex.

At the time of writing (September 2015), the second action plan's self-assessment report is still being developed by the Ministry of Interior and Administrative Reconstruction and has not been made available to the IRM research team.

Basic institutional context

The Ministry of Interior and Administrative Reconstruction¹ is the leading institution for the development and implementation of Greece's OGP action plan. In late August 2014, a presidential decree established the Department of Transparency, Open Government and Innovation within the Ministry, endowing them with a wide mandate.² The Department, among other things, is responsible for implementing open government policies across the public administration, promoting the necessary new regulations, and confronting organizational, legal, technical, and operational issues that might arise in its jurisdiction.

However, the presidential decree does not directly mention OGP or the action plan, reflecting the lack of a specific legal mandate. Moreover, the action plan has not been presented to the Prime Minister, nor has the full national action plan been presented for discussion in the Ministerial Council or Hellenic Parliament.

In contrast with the development cycle of the first action plan, the Hellenic Parliament contributed more in the development of the second action plan. The Parliament proposed six commitments on parliamentary activities structured in three thematic clusters making up an independent action plan that was subsumed under the full national action plan (see Overview of Commitments in Section IV). The Parliament is responsible for the implementation of these commitments but did not participate in the overall coordination of the rest of the national action plan.

The first year of the action plan coincided with extraordinary political events that hindered the ability of the administration to implement the action plan. The first event was an extended general election cycle that started after the results of the European Parliamentary elections were announced in June 2014. This period lasted until a new government coalition took office on 25 January 2015. The second event was the negotiation of a new bailout program with Greece's creditors, which took priority over all other government activities. The insecurity regarding the future prospects of Greece within the Eurozone posed a significant challenge to implementing open government reforms. A referendum on the bailout agreement and a new general election in September 2015 completed a sequence of events in a 14-month period within which Greece went through four different ministers that were in charge of OGP.

At the time of writing of the report (September 2015), six employees of the Ministry of Interior and Administrative Reconstruction and two of the Hellenic Parliament are now responsible for OGP issues on a part-time basis. There is no specific budget dedicated to OGP beyond some promotional funding for social media derived from relevant e-government public sector projects on an ad hoc basis.

Methodological note

The IRM partners with experienced, independent national researchers to author and disseminate reports for each OGP participating government. In Greece, the IRM partnered with Openwise. The IRM researchers gathered the views of civil society and interviewed appropriate government officials and other stakeholders. OGP staff and a panel of experts reviewed the report.

This report covers the first year of implementation of Greece's action plan, from 1 July 2014 to 31 June 2015. Beginning in 2015, the IRM published end-of-term reports to account for the final status of progress at the end of the action plan's two-year period. This report follows on an earlier review of OGP performance, "Greece Progress Report 2012-2013," which covered the development of the first action plan as well as implementation from 1 July 2012 to 30 June 2013.

To gather the voices of multiple stakeholders, Openwise organized one stakeholder forum, in Athens, which was conducted according to a focus group model and a public information event. Eleven participants attended the focus group representing organizations such as the GFOSS, Vouliwatch, Wikipedia Greek Community, the OGP government team, the Hellenic Parliament OGP team, as well as one employee of the General Secretariat of the Government and one local citizen. At the public information event, Openwise also reviewed the government's report on Greece's first action plan. Numerous references are made to these documents and events throughout this report. Summaries of these forums and more detailed explanations are given in the Annex.

¹ The Ministry of Interior and Administrative Reform was renamed to the Ministry of Interior and Administration Reconstruction in September 2015. However, the Ministry retained the same duties and responsibilities.

² Department of Transparency, Open Government and Innovation, Establishing Decree, [Greek] <http://bit.ly/1KT58u0>

II. Process: Action plan development

The Greek Government applied a combination of consultation methods to develop the action plan. At an early stage it organized working meetings with internal stakeholders. The intermediate step included a number of policy workshops with internal stakeholders and a few participants from civil society organizations. After the government released the contents of the action plan, it organized a five-week online consultation open to the general public.

Countries participating in the OGP follow a set process for consultation during development of their OGP action plan. According to the OGP Articles of Governance, countries must:

1. Make the details of their public consultation process and timeline available (online at minimum) prior to the consultation
2. Consult widely with the national community, including civil society and the private sector; seek out a diverse range of views; and, make a summary of the public consultation and all individual written comment submissions available online
3. Undertake OGP awareness-raising activities to enhance public participation in the consultation
4. Consult the population with sufficient forewarning and through a variety of mechanisms—including online and through in-person meetings—to ensure the accessibility of opportunities for citizens to engage.

A fifth requirement, during consultation, is set out in the OGP Articles of Governance. This requirement is dealt with in the Section III on Consultation during Implementation:

Countries are to identify an existing or new forum to enable regular multistakeholder consultation on OGP implementation.

This is discussed in the next section, but evidence for consultation before and during implementation is included here and in Table I for ease of reference.

Table I: Action Plan Consultation Process

Phase of Action Plan	OGP Process Requirement (Articles of Governance Section)	Did the government meet this requirement?
During Development	Were timeline and process available prior to consultation?	Yes
	Was the timeline available online?	Yes
	Was the timeline available through other channels?	Yes
	Provide any links to the timeline.	http://bit.ly/1O1bVWQ
	Was there advance notice of the consultation?	Yes
	How many days of advance notice were provided?	7
	Was this notice adequate?	No
	Did the government carry out awareness-raising activities?	Yes
	Provide any links to awareness-raising activities.	http://bit.ly/1O1bV9 http://bit.ly/1ZAxh2C
	Were consultations held online?	Yes
	Provide any links to online consultations.	1. The online consultation page in the English language: http://bit.ly/1mBpVgQ

		2. The online consultation page in the Greek language: http://bit.ly/1mBpX8o
	Were in-person consultations held?	Yes
	Was a summary of comments provided?	Yes
	Provide any links to summary of comments.	Deliberation summary: http://bit.ly/1NV2Sog
	Were consultations open or invitation-only?	Open
	Place the consultations on the IAP2 spectrum. ¹	Involve
During Implementation	Was there a regular forum for consultation during implementation?	No
	Were consultations open or invitation-only?	Invitation only for the physical meetings, online consultation open to the public
	Place the consultations on the IAP2 spectrum.	Consult

Advance notice and awareness-raising

The first consultative meeting with stakeholders was held on 17 December 2013. The Ministry of Interior and Administrative Reconstruction published a press release with a brief explanation of how the process would unfold.² Although the seven-day notice might seem sufficient for an in-person consultation, the situation differs regarding an online participation effort. Stakeholders noted that publishing a press release seven days in advance was not sufficient to inform potential target groups of citizens and civil society stakeholders that would be interested to take part in such a consultation in a meaningful way. Overall, the announcement did not explain every step of the consultation process, the strategic purpose of participating to OGP, or the nature of the action plan development process. The same applies to other awareness-raising and mobilization activities such as a social media promotion plan.

Some resources were allocated for a social media promotion program; however, there is no publicly available information online about its design and implementation.

There was no prior open public announcement of the workshops that the government organized in cooperation with the National School of Public Administration. All the participants had been notified and invited privately. The government also organized the first open data hackathon entitled, "Transforming Information into Business."

Depth and breadth of consultation

Greece has improved the overall quantity and quality of its public consultation practices by offering more substantial opportunities for civic engagement. Nevertheless, there is room for progress. For the development of the second action plan, the Ministry of Interior and Administrative Reconstruction carried out three types of consultation activities: working meetings, stakeholder workshops, and a public consultation.

Working meetings

The Ministry of Interior and Administrative Reconstruction organized a series of internal and external working meetings with the aim of evaluating the completion of the first action plan, raising awareness, building consensus, and creating a sense of coownership on the general approach of the action plan. In December 2013, the Ministry hosted a preparatory meeting inviting 35 people from 25 different organizations from the public, private and civil society sectors. Two subsequent workshops were organized and a summary of results is available in the OGP government team blog.³ The meetings were by invitation only and targeted government agencies, independent authorities,

and, to some extent, civil society organizations. They were held internally and without prior public notification to anyone other than private, individual calls aiming to inform the participants. Additionally, the Ministry held five meetings with the Danish Vice Minister, approximately 10 meetings of the OGP team, five meetings with the OGP Parliament team, and three meetings with the IRM researchers.

Stakeholder workshops

Two stakeholder meetings in the form of policy workshops took place as the result of the cooperation between the Ministry of Interior and Administrative Reconstruction and the National Centre for Public Administration and Local Government (EKDDA). These events aimed to stimulate organizations and experts to express their opinions and priorities on open government issues. There was no prior public announcement concerning these events. All the participants were privately invited. These events were held in the premises of the National Centre for Public Administration and Local Government (EKDDA), in Athens. The government invited three types of participants: (1) public administration stakeholders (among others, the Ministry of Justice, the Hellenic Parliament, and the General Secretary of E-Procurement), (2) Independent Regulatory Authorities (the Ombudsman and the authority for personal data protection), and (3) civil society organizations (such as the Greek chapter of the Open Knowledge Foundation, the Greek Free / Open Source Software Society, and Transparency International Greece). Approximately 80 percent of the final list of participants was composed of public administration bodies (central government and independent authorities), while only 20 percent were civil society organizations.⁴ For government officials unable to attend, the Ministry also reached out to government departments and agencies through an internal questionnaire soliciting ideas and suggestions for possible new commitments.

At these workshops, stakeholders did not have shared decision making power on the action plan. The workshops were designed as a consultation exercise only, and the government could disregard stakeholder input. Some proposals from civil society organizations were considered in the development of commitments, such as the implementation of the Open by Default principle for government produced documents and data. Open by Default is the proactive release of government information in machine-readable, easily accessible format that is open to the public. However, members of the government OGP team acknowledged in an interview with the IRM researchers that the idea to enforce the open by default principle largely responded to civil society's insistent push during the early stages of the stakeholder consultation. A comprehensive, well-documented report that includes summaries of all participants' views was made publicly available.⁵

Stakeholders found the consultation meaningful, but suggested to state a clearer agenda and final goals to have a more productive discussion. Stakeholders also discussed the advantages of creating a permanent consultation mechanism.

Online public consultation

Upon completion of the series of initial meetings and consultations, the Ministry of Interior and Administrative Reconstruction made the text of the first draft of the action plan available for an online public consultation on the Greek government open platform (www.opengov.gov) for a one-month period.⁶ The government announced the consultation process one week in advance through a press release. The online public consultation process lasted five weeks and was available for comment in English and Greek. The English version received 50 comments, whereas the Greek had 72. For the first two months after the consultation was concluded, a summary of submitted comments had not been provided. However, following the recommendation of the IRM researchers, the OGP national contact point published a report with a summary of comments a few weeks later.⁷

The Ministry of Administrative Reconstruction processed the comments with the assistance of the National Center of Public Administration and Local Government. Some suggestions from the public consultation were included in the final draft of the action plan before submission to OGP.

1 "IAP2 Spectrum of Political Participation," International Association for Public Participation, <http://bit.ly/1kMmlYC>

2 Open Government Partnership Action Plan Consultation, press release, 10 December 2013, [Greek] <http://www.ydmed.gov.gr/?p=7023>

3 The blog of the OGP government team presents details of the preparatory meeting (summary of views, list of invitees). Sofia Anagnostopoulou, "Meeting with Representatives," Open Government Partnership Blog, 17 December 2013, [Greek] <http://bit.ly/1kxYbbB>

4 Consultative Laboratory Report on Open Data, February 2014, [Greek] <http://bit.ly/1kxYi6S>

5 The elaborate summary of the stakeholders workshop, March 2014, [Greek]

http://www.ekdd.gr/ekdda/images/ektheseis_politikis/2014_OGP_Diafaneia_Dimosia_Symmetoxi.pdf

6 "Public Consultation of the Greek Action Plan for the Open Government Partnership Initiative," Greek Open Government Partnership, 6 May 2014, [Greek]

<http://www.opengov.gr/ogp/?p=306>

7 The summary of the consultation for the OGP action plan formation is available here: "Consultation Report," Ministry of Administrative Reform and Electronic Government, [Greek] <http://bit.ly/1NV2Sog>

III. Process: Action plan implementation

There was no regular multistakeholder consultation during the first year of implementation, though the development of a permanent OGP committee is underway. The IRM researchers stressed the importance of a permanent dialogue mechanism in the elaboration of the action plan.

Regular multistakeholder consultation

While consultation meetings were taking place, the Openwise IRM team stressed the significance of a permanent multistakeholder consultation to include the general public in the elaboration of the action plan. The IRM researchers highlighted examples from similar forums active in other OGP countries, namely those in the UK and Italy, stressing the potential benefits of a permanent consultation mechanism in relation to the quality of both the implementation of the Action plan and the development of its successor. On December 2014, the Greek Government initiated an open call for those interested in becoming a part of an OGP permanent cooperation committee to perform the tasks of a permanent multistakeholder consultation forum on various OGP issues. However, they have yet to establish a fully operational and regular OGP forum. The call was published in the government sponsored website (www.opengov.gr and <http://goo.gl/Xm8sFb>). Interested parties had the opportunity to submit their applications to join the forum online. According to the call, the forum has the following four objectives: first, to cooperate with the government in the implementation of the national action plan; second, to present the progress of implemented actions; third, to develop new proposals for consideration in future action plans; and fourth, to transfer know-how and exchange experiences.

The first meeting of the committee took place on the premises of InnovAthens, in the center of Athens. The meeting had two main purposes: to present information publicly about the OGP's mission and values and to gather opinions on the legal form, main priorities, and roadmap of the permanent committee.

Whatever the form the permanent committee takes, the IRM researchers recommend strongly that it adopt concrete power sharing instruments. At present, engagement with CSOs is deemed either as an obligation that fulfills OGP requirements or as a public relations strategy. Meaningful civil society engagement should be an ongoing effort.

IV. Analysis of action plan contents

All OGP participating governments develop OGP country action plans that elaborate concrete commitments over an initial two-year period. Governments begin their OGP country action plans by sharing existing efforts related to open government, including specific strategies and ongoing programs. Action plans then set out governments' OGP commitments, which stretch practice beyond its current baseline. These commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area.

Commitments should be appropriate to each country's unique circumstances and policy interests. OGP commitments should also be relevant to OGP values laid out in the OGP Articles of Governance and Open Government Declaration signed by all OGP participating countries. The IRM uses the following guidance to evaluate relevance to core, open government values:

Access to Information

Commitments around access to information:

- Pertain to government-held information, as opposed to only information on government activities. As an example, releasing government-held information on pollution would be clearly relevant, although the information is not about "government activity" per se;
- Are not restricted to data but pertain to all information. For example, releasing individual construction contracts and releasing data on a large set of construction contracts;
- May include information disclosures in open data and the systems that underpin the public disclosure of data;
- May cover both proactive and/or reactive releases of information;
- May cover both making data more available and/or improving the technological readability of information;
- May pertain to mechanisms to strengthen the right to information (such as ombudsman's offices or information tribunals);
- Must provide open access to information (it should not be privileged or internal only to government);
- Should promote transparency of government decision making and carrying out of basic functions;
- May seek to lower cost of obtaining information; and
- Should strive to meet the 5 Star for Open Data design (<http://5stardata.info/>).

Civic Participation

Commitments around civic participation may pertain to formal public participation or to broader civic participation. They should generally seek to "consult," "involve," "collaborate," or "empower," as explained by the International Association for Public Participation's Public Participation Spectrum (<http://bit.ly/1kMmlYC>).

Commitments addressing public participation:

- Must open up decision making to all interested members of the public; such forums are usually "top-down" in that they are created by government (or actors empowered by government) to inform decision making throughout the policy cycle;
- Can include elements of access to information to ensure meaningful input of interested members of the public; and
- Often include the right to have your voice heard, but do not necessarily include the right to be a formal part of a decision-making process.

Alternately, commitments may address the broader operating environment that enables participation in civic space. Examples include but are not limited to:

- Reforms increasing freedoms of assembly, expression, petition, press, or association;
- Reforms on association, including trade union laws or NGO laws; and
- Reforms improving the transparency and process of formal democratic processes such as citizen proposals, elections, or petitions.

The following commitments are examples of commitments that would **not** be marked as clearly relevant to the broader term, civic participation:

- Commitments that assume participation will increase due to publication of information without specifying the mechanism for such participation (although this commitment would be marked as “access to information”);
- Commitments on decentralization that do not specify the mechanisms for enhanced public participation; and
- Commitments that define participation as inter-agency cooperation without a mechanism for public participation.

Commitments that may be marked of “unclear relevance” also include those mechanisms where participation is limited to government-selected organizations.

Public Accountability

Commitments improving accountability can include:

- Rules, regulations, and mechanisms that call upon government actors to justify their actions, act upon criticisms or requirements made of them, and accept responsibility for failure to perform with respect to laws or commitments.

Consistent with the core goal of “Open Government,” to be counted as “clearly relevant,” such commitments must include a public-facing element, meaning that they are not purely internal systems of accountability. While such commitments may be laudable and may meet an OGP grand challenge, they do not, as articulated, meet the test of “clear relevance” due to their lack of openness. Where such internal-facing mechanisms are a key part of government strategy, it is recommended that governments include a public-facing element such as:

- Disclosure of non-sensitive metadata on institutional activities (following maximum disclosure principles);
- Citizen audits of performance; and
- Citizen-initiated appeals processes in cases of non-performance or abuse.

Strong commitments around accountability ascribe rights, duties, or consequences for actions of officials or institutions. Formal accountability commitments include means of formally expressing grievances or reporting wrongdoing and achieving redress. Examples of strong commitments include:

- Improving or establishing appeals processes for denial of access to information;
- Improving access to justice by making justice mechanisms cheaper, faster, or easier to use;
- Improving public scrutiny of justice mechanisms; and
- Creating public tracking systems for public complaints processes (such as case tracking software for police or anti-corruption hotlines).

A commitment that claims to improve accountability but assumes that merely providing information or data without explaining what mechanism or intervention will translate that information into consequences or change would **not** qualify as an accountability commitment. See <http://bit.ly/1oWPXdl> for further information.

Technology and Innovation for Openness and Accountability

OGP aims to enhance the use of technology and innovation to enable public involvement in government. Specifically, commitments that use technology and innovation should enhance openness and accountability by:

- Promoting new technologies that offer opportunities for information sharing, public participation, and collaboration;
- Making more information public in ways that enable people to both understand what their governments do and to influence decisions; and
- Working to reduce costs of using these technologies.

Additionally, commitments that will be marked as technology and innovation:

- May commit to a process of engaging civil society and the business community to identify effective practices and innovative approaches for leveraging new technologies to empower people and promote transparency in government;
- May commit to supporting the ability of governments and citizens to use technology for openness and accountability; and
- May support the use of technology by government employees and citizens alike.

Not all eGovernment reforms improve openness of government. When an eGovernment commitment is made, it needs to articulate how it enhances at least one of the following: access to information, public participation, or public accountability.

Key Variables

Recognizing that achieving open government commitments often involves a multiyear process, governments should attach time frames and benchmarks to their commitments that indicate what is to be accomplished each year whenever possible. This report details each of the commitments the country included in its action plan and analyzes them for their first year of implementation.

All of the indicators and methods used in the IRM research can be found in the IRM Procedures Manual, available at (<http://www.opengovpartnership.org/about/about-irm>). One measure deserves further explanation due to its particular interest for readers and usefulness for encouraging a race to the top between OGP participating countries: the “starred commitment”. Starred commitments are considered exemplary OGP commitments. In order to receive a star, a commitment must meet several criteria:

1. It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity.
2. The commitment’s language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability.
3. The commitment would have a "transformative" potential impact if completely implemented.
4. Finally, the commitment must see significant progress during the action plan implementation period, receiving a ranking of "substantial" or "complete" implementation.

Based on these criteria, Greece’s action plan contained no starred commitments.

Note that the IRM updated the star criteria in early 2015 to raise the bar for model OGP commitments. Under the old criteria, a commitment received a star if it was measurable, clearly relevant to OGP values as written, had moderate or transformative impact, and was substantially or completely implemented.

Based on these old criteria, Greece’s action plan would have received one starred commitment:

- Commitment 2.1: Public Sector Information (PSI) Directive on reuse of data

Finally, the graphs in this section present an excerpt of the wealth of data the IRM collects during its progress reporting process. For Greece’s full dataset, see the OGP Explorer at www.opengovpartnership.org/explorer.

General overview of the commitments

The second action plan puts increased emphasis in opening government data to the public. This is to be achieved through a set of commitments that concern both legal and administrative issues as well

as focusing on datasets from the Ministries of Finance, Culture and the Environment that open up geospatial, cultural, offshore company registers and numerous other public sector information. In addition, a significant part of the second action plan is comprised of commitments that consist of continuation of efforts that began during the first action plan cycle and reflected an increased focus on public participation elements in implementing commitments. These include improvements to the Transparency Program, its new website interface called the Diavgeia platform and the public consultation website at www.opengov.gr. Further commitments were added to continue work that had already begun during the first action plan cycle on the open publication taxation and geospatial data.

New commitments were designed to address public administration integrity and accountability issues. These includes initiatives that aim to allow for transparency in filling important posts in the public sector, the publication of official organizational charts for public sector agencies and the reorganization of the inspectorate bodies tasked with fighting corruption.

The third part of this second action plan reflects, for the first time, the engagement of the Hellenic Parliament in the commitment formation process. The Parliament proposed six commitments structured along three thematic clusters. This reflects Parliament's desire to be solely responsible for coordinating the implementation of these commitments.

Clustering

The action plan contains 19 commitments. The majority of them are examined and evaluated separately. For ease of analysis, a small number of commitments have been clustered and are evaluated together according to similarities in thematic characteristics. In particular:

Commitment 2.1. (PSI Directive on the reuse of data) and Commitment 2.2. (Regulatory amendments on open data) are examined together because they are both concerned with the creation of the legal framework required to provide data and public sector information openly.

Commitment 2.6. (Open data for offshore companies) and Commitment 2.7. (Open public sector datasets) are grouped together because the Ministry of Finance has a central role in coordinating their implementation.

Commitment 4.1. (Track changes on bills) and Commitment 4.2. ('Parliamentary Transparency' section of Parliament's website) have been clustered for the purpose of joint analysis. They are both related to the expansion of already operational Hellenic Parliament IT systems.

Similarly, Commitment 4.3. (Parliament Website and new standards), Commitment 4.5. (Enhancement of Social Media Policy in the Hellenic Parliament), and Commitment 4.6 (Online provision of Exhibitions) form two additional small clusters. They represent actions that had been initiated before the formulation of the second action plan and propose improvements to the online digital image of the Hellenic Parliament.

Theme I: Boosting public participation

I.1. Transparency Program upgrade

Commitment Text:

Promotion of transparency and accountability, through the improvement of the legal framework and the enhanced application of process transparency in public administration. This is the second phase of the project, and it is called Transparency Program II.

The main interventions needed pertain to the institutional and technological enhancement of the current (governmental) Transparency Program project:

Compliance and uniform application of regulations regarding the institutional strengthening of the published document. This will ensure that the unique number given to each document (and not the document itself or its printed version) will be sufficient in referencing, using and handling, throughout the public sector, without the need of additional validation or signing.

Substantial improvement of the website user interface, including additional search functionality, improved usability and enhanced accessibility, and compliance with the WCAG standard (version 2.0, level AA).

Addition of electronic communication channels among citizens, businesses and public administration, in order to submit comments and discuss the published documents (using the user's account in publishing documents or user accounts on social media e.g. Google, Facebook, etc.).

Provision of personalized content and search results

Improvement of open data provision mechanism, in machine readable formats, aiming to enhance interoperability. Use of open data from governmental audit mechanisms. Implementation of applications for the monitoring of the administrative actions from all interested parties.

Enrichment of the information provided by Transparency Program, with clear categorization based on the government agencies and using additional public sector data sources (human resources, e-procurement, income etc.). This way a wider system for information provision will be created, available to the public. A separate subsystem will be designed, addressing the need of public administration bodies to draw business intelligence reports on public administration functioning, expenses and to support decision making.

Milestones – Timescales

- *Issue of instructions and guides on the application of the new pertaining legislative framework and the new pertaining information system (October 2014).*
- *Complete integration and operation of public bodies in the new Transparency Program (December 2014).*
- *Conduction of study and gradual promotion of actions enriching the data provided from other data sources of the public sector. Target being the centralized, correct, information provision for a variety of issues; including expenditure, revenue, personnel etc. The study will be initially drafted by MAREG in collaboration with stakeholders - owners of complementary data sets and will be finalized after consultation with NGOs and civil society organizations working in the field (study June 2015, gradual implementation June 2016).*

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): Information Society S.A

Start Date: October 2014

End Date: June 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
I.1. Overall				✓	✓			✓		✓					✓	
I.1.1. Issue guidelines				✓	✓					✓						✓
I.1.2. Integrate public bodies in new system				✓	Unclear					✓						✓
I.1.3. Data and promotion study				✓	✓			✓			✓			✓		

What happened?

This commitment builds on the Transparency Program launched in October 2010, requiring all government institutions to publish decisions on a transparency portal before they can be considered for implementation.

At the time of writing this report, two of the three milestones have been completed. The third milestone is on schedule to be completed by the end of the action plan implementation period. Therefore, the IRM researchers found the goals of Commitment I.1 to be substantially completed.

Regarding milestone I.1.1, the government introduced legislative acts and issued guidelines targeted to secure the appropriate implementation of the new Diavgeia framework (Transparency Program) established in December 2013. Under the new legislation (I.4305/2014) to be implemented beginning in April 2016, nongovernmental organizations that annually receive state funds exceeding the amount of 3,000 euros are now required to upload aggregated accounts of their spending. The IRM researchers found that these documents are all available online and easily accessible for public access.¹

In relation to commitment I.1.2, while the platform is currently operational, the government bodies have yet to fully adopt the new interface. The website (diavgeia.gov.gr) was operational during the consultation for the second national action plan in spring 2014. The new version of this online platform includes some of the technical functionalities that are described in the commitment, including the improved search engine abilities and citizen feedback opportunities. According to the OGP team government representative, the new platform is designed to help organizations fulfill the law's requirements by allowing them to upload their documents with all the appropriate metadata in a uniform way, further facilitating the search option.

However, there is no data that indicates the exact extent to which the public sector uses the unique ID number (ADA, meaning Number of Internet Uploads) that the Diavgeia system assigns to each document for internal referencing purposes.² This referencing system was one of the original e-government goals of the Transparency Program. But, according to an OGP team government representative, there is no data to indicate the degree to which public entities beyond the Ministry of the Interior³ use it, although day-to-day observation suggests that more public entities use it. Overall, user feedback suggests that the new platform offers improved searching facilities and experience⁴ for users. Therefore, the IRM researchers found that while this commitment has been completed as worded in the action plan, additional work needs to be done for government bodies to fully integrate into the new interface.

For milestone I.1.3 the government committed to (1) completing a study to enrich the data provided by the public sector and (2) fulfilling its implementation of findings by June 2016. At the time of writing this report, the IRM researchers found that instead of a study, the government implemented this milestone by participating in the European project “YourDataStories.”

YourDataStories⁵ is a collaborative European project regarding creative use of open data to tell stories. The Ministry of Interior is a partner to this project and hopes to add value to the Transparency Program data by participating in pilot scenarios regarding public money spending monitoring and fiscal transparency data driven applications. The YourDataStories is relevant to the purpose of the milestone (to gather information about how people use data), but the government has modified the activity. The IRM researchers therefore found that this milestone is considered on schedule, although with limited completion.

Did it matter?

The institutional and technological upgrading of *Diavgeia* aimed to provide timely access to a wide range of government information, which is directly relevant to OGP values of access to information and technology and innovation for transparency and accountability. Looking at the big picture, the numbers suggest that the consolidation of the *Diavgeia* reform has been accomplished. Some stakeholders raised concerns about loopholes in the legislation establishing *Diavgeia* that could undermine the openness of the transparency program. In the first action plan, this program had considerable impact on the policy area,⁶ however, as written, the commitment focuses on upgrades to the program interface and migrating over government bodies from the old interface to the new. Therefore, the IRM researchers found this commitment to have overall minor potential impact.

The *Diavgeia* program, which has been operational since 2010 and was upgraded in 2014, has seen overall more than 16 million government decisions uploaded daily on the web platform by a large community of 60,342 civil servants and employees that work in 4,233 public sector and civil society organizations.⁷ New kinds of government decisions, including budgets for a wide range of public sector organizations, are being published online and a government official states that the continued improvement of the search capability, the user friendliness of the website, and the usefulness of the data are the most important challenges for the future.⁸ According to Nikoleta Charalampopoulou, member of the Greek Government OGP team, new organizations like NGOs are joining the program. Michalis Vafopoulos, a researcher with expertise on openness and open data who created the www.publicspending.net website which uses *Diavgeia* as the source of its data for Greece, considers that overall the upgrading of the program has helped to augment the institutional use of the uploaded documents. According to Mr. Vafopoulos, further action to build public awareness for the program is needed. More specifically, he draws attention to the fact that although the quality of the data has improved there are certain deficiencies and mistakes in crucial data such as the inclusion of the correct, Unique Tax ID numbers of organizations. Such drawbacks hinder accurate data processing⁹ and extrapolating further meaning from the data. According to the government, the problem with incorrect Tax ID numbers is limited, directly addressed and does not have a significant impact in the operation of the program.

However, stakeholders have expressed grave concerns about recent legislative changes, which may undermine any gains in transparency provided by the *Diavgeia* portal. In early May 2015, the NGO Greek/Free Open Source Software Society (GFOSS) raised concerns about the appropriate establishment of *Diavgeia*. The platform was intended to make all public administration decisions public; however, the introduction of amendment 105/46-30.4.2015 allowed a specific type of public administration decisions on funds not spent during the fiscal year to be exempt from this disclosure requirement for a certain period of time.¹⁰ The GFOSS argues that such exemptions create a strong negative precedent that might lead to more exemptions in the future, fully undermining the potential impact of this system on openness and transparency in this policy area. The Greek National Chapter of Transparency International also raised concerns about the impact of this amendment on the utility of *Diavgeia*, stating that it could open the door to corruption because there is no way for citizens to monitor and track decisions independently on the allocation of the unused funds to ensure that they are not misappropriated.¹¹ Nevertheless, this platform could give way to new indirect mechanisms of accountability through a notification option that allows citizens to track decisions made by the

government. On the exceptions issue, the government argues that this amendment concerns only certain forms of budgetary information and thus is not against the fundamental principles governing the Transparency Program, as it does not bring a change in implementing the relevant provisions of the program, apart from transferring the time of publishing for only a specific sub-category of legislative acts, due to the existing fiscal provisions. The IRM researchers confirm that these exceptions indeed concern a specific type of decisions for a certain period of time, but they also stress that the most innovative element that makes the Diavgeia program a success is the provision that a decision is enforced only after the time it is published on the platform. Further, the civil society worries that the exclusion practice might be applied to other types of decisions in the future proved right, as a new exception of the same type concerning specific spending decisions from some Ministry of Foreign Affairs agencies was introduced in late December 2015.¹²

Regarding the study proposed for milestone 1.1.3, the Ministry aims to complete the study via its collaboration in the collaborative European project “Your Data Stories.” This project contains a pilot application that bears considerable value in extending the social impact of the data produced by the transparency program. The IRM researchers found that this milestone could have moderate potential impact. However, the available documentation of the project does not include promotional actions, as the original text of the milestone suggests.

Moving forward

Five years after its launch, the challenge ahead for the Diavgeia program is to depart from the model of the past action plans, mostly aimed towards the consolidation of its operation. It should attempt to create a new model that puts emphasis on achieving measurable impact that is highly relevant for OGP values.

Having said this, the IRM researchers recommend the following:

- **Make no exemptions:**
 - Revise the current amendment allowing exemptions for certain governmental bodies to exclude specific decisions from publication on Diavgeia. Future legislation should create strict guidelines for when decisions can be exempted from publication.
- **Learn more:**
 - Explore a series of use cases of the Diavgeia program web platform interface in collaboration with civil society and the private sector. The systematic exploration of use case is meant to establish a culture of constant optimization of the interface in its future iterations and to discover in a timely manner possible problems or an omission in the types of uploads in the Diavgeia system.
 - Investigate specific applications of the “targeted transparency” concept¹³ across a select number of policy challenges. For example, data could be extracted from Diavgeia on areas such as health spending and could be made available in a summarized visualization that would make it easier for stakeholders and the general public to design and implement policy solutions.
- **Take action:**
 - Create an impact map for the Diavgeia program that defines concrete applications that promote better access to information, meaningful participation, and accountability.
 - Deploy the above applications in an agile manner, for example, in the form of either a hackathon or an open innovation contest.
 - Take advantage of the nationwide human network of the thousands of public employees that use the Diavgeia program by designing and developing a web-based community like govloop.com.
 - Design with the help of civil society experts a permanent technical solution to proactively prevent the problem with some of the expense decisions that are currently being published with errors in the Tax ID number.

- Consider further strengthening of the Diavgeia program by including the obligation to publish decisions on the online platform to guarantee their validity in the future constitutional reform.
- Systematically raise awareness of the guidelines and best practices by a monthly e-newsletter.
- Revise milestone I.1.3 to define concrete promotional actions and set up a specific deadline for the study.

1 Diavgeia Framework Legislative Acts, [Greek] <https://goo.gl/fKNm5m>; [Greek] <https://goo.gl/SQvqes>:

2 Nicolet Charalampopoulou, Member of the Ministry of Interior's Open Government Team, interview with the IRM researchers, June 2015.

3 After the general election of January 2015, the former of Interior, Administrative Reform and E-government was renamed to Ministry of Interior and Administrative Reconstruction.

4 Nicolet Charalampopoulou, Member of the Ministry of Interior's Open Government Team, interview with the IRM researchers, June 2015.

5 More information on the pilot scenarios and cases studies of the YourDataStories project can be found. Andreas Dimitriou, Nancy Routzouni, Vassiliki Ntalakou, Tasos Papazarifis, Thodoris Papadopoulos, "Focus Groups – Greece – Pilot 1 and Pilot 3," 2015, <http://bit.ly/1PB4Squ>

6 The Open Government Partnership, "Independent Reporting Mechanism Greece: Progress Report 2012-2013" by Athanasios Priftis (Report, Washington, D.C., 2014), <http://www.opengovpartnership.org/country/greece/irm>

7 Real Time Statistics, Transparency Program, Diavgeia <http://diavgeia.gov.gr>

8 Nicolet Charalampopoulou, Member of the Ministry of Interior's Open Government Team, interview with the IRM researchers, June 2015.

9 Michalis Vafopoulos, affiliated researcher at the Software & Knowledge Engineering Laboratory (SKEL) of the Institute of Informatics & Telecommunications of the National Center of Scientific Research «Demokritos», interview with the IRM researchers, July 2015.

10 "Amendment Undermines the 'Clarity'" 5 May 2015, <http://bit.ly/1VupmBx>

11 HuffPost Greece, "Transparency International Greece: The Amendment to the Clarity Opens the Way to the Opacity and Corruption," 7 May 2015, <http://huff.to/1TtShnU>

12 Proto Thema, "They try again to abolish Diavgeia", 21 December 2015, <http://www.protothema.gr/greece/article/538193/pane-na-katargisoun-pali-ti-diaugeia/>

13 Archon Fung, Mary Graham, and David Weil, *Full Disclosure: The Perils and Promise of Transparency* (New York: Cambridge University Press, 2007).

I.2. Public participation in decision making

Commitment Text:

Enhancement of the consultation process in all levels (institutional/legal, operational, technical). More specifically the following areas will be improved:

- Institutional: Strengthening of current institutional/legal framework
- Technical: The electronic system www.opengov.gr will be the focal point of information provision and consultation conduction throughout the public sector. Also the functionality offered for consultation of running consultations will be enhanced
- Operational:
 - Introduction of a unique methodology for deliberation conduction, which will apply to all public administration bodies.
 - Adoption of a minimum consultation period.
 - Highlight of best practices. Study of consultations with increased participation.
 - Identification of consultations and submitted draft legislation. Existence of link between the consultation and final draft (a results table with the comments and suggestions that were accepted will be included). Adoption of same enumeration in both consultations provided and final draft, in order to better correlate
 - Template for consultation results presentation.
 - Annual assessment of results.
 - Training and utilization of executives.
 - Adoption of mechanisms for reaching and mobilizing citizens. CSOs will be invited to actively participate in this process.
 - Structured communication with all interested parties.
 - Gradual integration of consultations at regional and local level (municipalities) on citizens' everyday life issues.

Milestones - Timescales

- Regulation/legislation in place by end of December 2015.
- Operational and technical improvements: gradual implementation, ending June 2016. There will be pertaining Action Plan by the end of 2014 (that will be published), followed by incremental implementation and deployment.
- Preparation of a plan for public administration training, awareness raising and citizen mobilization (December 2014), which will include the needed steps for gradual application.

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): National Center for Public Administration

Start Date: December 2014.....

End Date: June 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
I.2. Overall			✓		✓	✓		✓		✓				✓		
I.2.1. Legislative action		✓				✓				✓			✓			
I.2.2. Operational and technical improvements				✓	✓	✓		✓			✓			✓		
I.2.3. Training and mobilization plan		✓				✓				✓				✓		

What happened?

With this commitment the government attempts to consolidate the legal framework to fine-tune the operational aspects of participatory online consultation. From the commitment text, it is difficult to define the exact legal interventions purported to strengthen the current framework. Nevertheless, the operational and technical improvements set out in the commitment provide standards that would possibly strengthen the legal framework. The government is committed to securing a minimum consultation period, introducing a consultation methodology for the public sector, devising a link between the consultation text and the final draft, and reaching out to mobilize meaningful stakeholder participation.

Overall, the IRM researchers found evidence of limited completion for this commitment. Milestone 1.2.1 has not been started, although the timescale indicated in the commitment text does not require legislative action to be completed until December 2015. Milestone 1.2.2 has been partially implemented. The IRM researchers found evidence of limited consultations, but currently there is no adequate mechanism for the Parliament to adopt the findings of these consultations. Milestone 1.2.3 has limited completion because, although there is still no official plan for training, awareness-raising and citizen mobilization, the National Center for Public Administration provides some training and technical support to the teams tasked with implementing consultations in each ministry.

Currently, fast track consultations usually average between seven and 10 days. The National Center of Public Administration (a government agency that operates under the Ministry of Interior and Administrative Reconstruction) provides guidelines, training, and studies on how consultations should be conducted. But they have limited influence on the consultation process because they have no capacity to change the duration of a consultation or to safeguard the content of the summary reports.¹

For most of the consultation topics published on the opengov.gr website and especially for draft laws, Parliament is the authority with the final decision making power. However, in essence, the processes on the consultation website (www.opengov.gr) remain operationally disconnected from the consultative processes in the Parliament as soon as the online consultation deadline expires. This means that although the summary reports of the online public consultation are published on the Parliament's website (but not always on the opengov.gr website), there is no immediate way to determine to what extent they impacted the final version of the policy document. This represents a weakness in the consultation process because citizen participation is not clearly relevant in the decision making process.

Milestones 1.2.2 and 1.2.3 have limited completion due to the lack of official plans, in both the commitment language and the government's implementation strategy, which should exemplify methodologies, best practices, training and citizens' mobilization efforts. For example, due to financial reasons, the newsletter service that informed about upcoming consultations and that mobilized tens of thousands of interested citizens to participate is not working. The National Center for Public Administration is currently working on an in-house solution to replace it.²

Also, in the beginning of the implementation period, the national portal for online consultations on draft laws (www.opengov.gr) was in its fifth year of operation, having hosted in total 428 consultations that received 115,561 comments.³ Despite the volume of participation, the overall operational quality lags behind the minimum standards of practice, especially in terms of consultation length, set by Law 4048/2012, which regulates the process.⁴ The law prescribes the minimum length of consultation and allows for exceptions in special circumstances. However stakeholders interviewed view this as a loophole. For example, in a previous (unsuccessful) attempt to amend the Diageia system, the consultation time frame was limited to one day to 'expedite' the process.

As of the beginning of 2012, the law on good governance attempts to institutionalize accountable and participatory rulemaking, among other priorities. However, some of its regulatory aspects, such as the minimum timetable of three to four weeks for a consultation, remain either inadequately implemented or totally neglected. For example, Law 4048/2012 requires emailing citizens that take part in consultation to inform them on the results of their participation and about whether - and in what way - the government takes their input into account. Currently, no such feedback has been

sent by email to participants. Furthermore, there are other empirical signs of unstable implementation practices. For example, one online consultation that took place on September 2014 received no comments from citizens,⁵ and only one consultation that month concluded with a summary report written by the relevant authority.⁶

Did it matter?

Milestones 1.2.1 for enforcing a legislative framework for participatory online consultations and 1.2.2 and 1.2.3 for introducing methodology, training, and mobilization efforts are relevant with the value of increasing civic participation. However, due to the planned incremental changes and very little progress achieved so far, the potential impact of this commitment remains minor.

According to Anastasia Papastylianou, the Head of an Innovation Unit within the National Center for Public Administration in charge of the technical aspect of the consultations, there were only slight improvements in the consolidation of the consultation processes, including codification of comments and recording of recommendations, during the 2014-2015 period. In an interview conducted by an IRM researcher, Law 4048/12 needs further specifications and clarification. Moreover, the National Center for Public Administration provides an ISO process, guidelines and templates to help authorities in consultations⁷, designs different evaluation methods as well as basic indexes and consultations analytics⁸ and opens up all consultations data in xls and csv formats⁹.

The IRM researchers organized a focus group with members of the civil society and the public sector to discuss consultation methods and to evaluate the quality of consultation summary reports. Participants noted that summary reports have been improving over time. However, the impact of this document in the Parliament's decision making process is unclear because no evidence shows how the consultation summary reports are used. According to Panagiotis Vlachos of NGO Vouliwatch, it is important to connect open government with parliamentary transparency to achieve a coherent understanding of the policy issues and their relation with the results of open public participation.¹⁰

Moving forward

According to many stakeholders from both civil society and the public sector the implementation of Law 4048/12 on good governance should be top priority. Also, members of civil society organizations have stressed the need to open both the legislative drafting and the consultation process, as well as to establish a mechanism that guarantees the deliberation processes within the Parliament. This refers to opening the drafting legislative processes to the public as well as to linking consultations that take place online at opengov.gr with internal Parliament discussions.¹¹

The IRM research team introduces new and updated recommendations of some recurring issues stemming from the previous IRM report (2012-2013), including the following:

- Introducing the first version of a code of deliberation applicable to all public entities involved in drafting or documenting legislation. The code should consist of comprehensive methodological guidelines and applied best practices for conducting consultations.
- Initiating a public audit mechanism, both on the quantity and the quality of the legislation proposed for consultation. This mechanism could be established within the unit that coordinates the commitment, which also could become responsible for updating the code of deliberation.
- Introduce evidence-based policymaking by connecting all discussed legislation with sources of public information (e.g., the platform Transparency Program (CI@rity/Diavgeia)), documentation (e.g., feasibility studies, white papers), and civil society initiatives.
- Establish a training mechanism for performing integrated public consultation within the public sector. A byproduct of this mechanism could be enriching newer versions of the deliberation code of conduct with best practices.
- Develop a formal citizen engagement strategy that goes above and beyond typical social media management and assign relevant tasks via typical job descriptions.
- Allow for a consultation platform that records opinions that are linked with specific arguments for all issues.¹² This recommendation was suggested by Manos Kefalas, a

Wikipedia community trainer who took part in the IRM stakeholder focus group, as a way to open innovative possibilities in the realm of public participation.

The National Center for Public Administration suggests the following:

- Enhance the Human Network support system in order to improve the operational activities
- Expand the consultations to the Local Government and Municipalities
- New workshops for best practices and Hackathons for comment inclusion
- Establish a yearly national evaluation mechanism in addition to the IRM
- Recognise and Promote Best Practices
- Create Guidelines for “ Good Consultation”
- Information days and learning activities
- Improve and expand the platform

1 Anastasia Papastylianou, responsible for consultations, Employee at the National Center of Public Administration, interview with the IRM researchers, July 2015. See, for instance, a study about methods and tools to evaluate public consultations. National School of Public Administration and Local Government, Educational Series, 2014 [Greek] <http://bit.ly/1RUWfbM>

2 Anastasia Papastylianou, responsible for consultations, Employee at the National Center of Public Administration, interview with the IRM researchers, July 2015.

3 “Statistics,” OpenGov.gr, [Greek] <http://bit.ly/1TtSmbs>

4 Ministry of Interior, Administrative Reform and E-government, “Law No. 4048/2012,” 30 March 2012, [Greek] <http://www.ydmed.gov.gr/?p=1803>

5 Ministry of Education, Consultation with No Comments, [Greek] <http://www.opengov.gr/ypepth/?p=2112>; Ministry of Development and Competitiveness, Consultation with No Comments, <http://www.opengov.gr/ypoian/?p=5188>

6 The consultation of the Ministry of Administrative Reform and E-governance about the Action Plan for E-government includes a report that summarizes the conclusions of the participation.

7 <http://www.opengov.gr/home/services>

8 <http://www.opengov.gr/home/%CE%BFpengov-statistics>

9 <http://www.opengov.gr/opengov/StatsPerMinistry.php>

<http://www.opengov.gr/opengov/Totalstats.php>

10 Stakeholder focus group at InnovAthens in Athens, Greece, 3 December 2014.

11 Stakeholder focus group, 3 December 2014.

12 Stakeholder focus group, 3 December 2014.

Theme 2: Open government data

2.1. PSI Directive on the reuse of data

Commitment Text:

The Greek Government will incorporate on its legislation the revised European Directive on the re-use of public sector information (PSI) until the end of December 2014.

Milestones –Timescales

- The incorporations of Directive 2013/37/EU into Greek legislation will be completed by the end of June 2015.

2.2. Regulatory amendments on open data

Implementation of regulatory amendments that will facilitate further provision of open data managed by public bodies. This commitment entails the following 3 interventions:

- Publication of instructions (based on current legislation) requiring the inclusion of open data dissemination on designing publicly funded IT projects.
- Publication of licensing framework for public data.
- Publication of open data dissemination guide (drawing from existing scientific literature and expertise). Preparation and circulation to the central and local administration of a guide that will describe the obligations, procedures, methodology and technology for publishing open data. The guide will be written in clear and simple language. It will demonstrate the value of open data, the formats for publication and standard methodologies for optimal operational coordination of the process within each public body.

Milestones –Timescales

- Publication of open data provision guide (December 2014)
- Guidelines for including open data provision on the design of IT projects (June 2015)
- Disclosure of open data licensing framework (June 2015)

Editorial Note: Commitments 2.1 and 2.2 were clustered for the purpose of analysis in this report. They will be discussed jointly in the narrative below.

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): None

Start Date: December 2014.....

End Date: June 2015

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
2.1. Overall				✓	✓						✓					✓
2.2 Overall				✓	✓						✓			✓		
2.2.1. Open data provision guide				✓	✓						✓				✓	
2.2.2. Open data provision on the design of IT projects			✓		✓					✓			✓			
2.2.3. Open data licensing framework				✓	✓					✓			✓			

Editorial note: Under the old criteria of starred commitments, this commitment would have received a star because it is clearly relevant to OGP values as written, has moderate potential impact, and has been substantially or completely implemented (note that the IRM updated the star criteria in early 2015).

What happened?

These commitments aim to introduce a modern legal framework on open data that fulfills European Union Member State requirements.

The government has fully completed the first commitment by incorporating Directive 2013/37/EU into Law 4305/14,¹ which also includes regulatory amendments that facilitate further provision of open data managed by public bodies. The open by default policy has promoted the elimination of complex regulatory barriers that hinder the open release of public sector data. Additionally, approximately two months after voting on the new regulatory framework, the government issued detailed guidelines for public sector organizations in their efforts to define, record, and release their data in the appropriate formats.² Both the law and the guidelines required the release of the catalogues describing the datasets to occur within a six-month deadline (by the end of April 2015). Just a few organizations managed to respond to that deadline. For that reason, the government acknowledged the delay and issued further guidance.

Commitment 2.2 focuses on implementation of regulatory amendments to facilitate further provision of open data managed by public bodies. During the second action plan consultation period, an online consultation took place regarding the law on open provision and further use of public data, documents, and information. This draft law aimed to establish the open by default policy to public information, and it included a set of regulatory interventions that deal with the issues of the open government data commitments in the action plan.³ The IRM researchers found that milestone 2.2.1 was substantially completed, while the other two milestones concerning the guidelines for open data provision on the design of IT projects (2.2.2) as well as the disclosure of the licensing framework (2.2.3) had not been started. Therefore, the IRM researchers code this commitment as having limited overall completion.

The legislation with the regulatory amendments concerning open data was voted in Parliament on 30 October 2014. A few days later, the government organized an event to inform the public about the practical changes brought about by the legislation. Vasiliki Dalaku, a legal consultant and member of the Government's OGP team, explained some innovative elements of the new legislation, such as the open by default policy, the initiation of a public open data registry, the institutionalization of an annual open data contest, the creation of excellence awards for public institutions, and the submission of an annual open data report by the Minister of Administrative Reconstruction to the Parliament.⁴

Did it matter?

The new legal framework on open data, which aligned with the European Union requirements, represents an important step forward in enabling public access to information. Overall, civil society responded positively to the adoption of the framework. However, Vasilis Sotiropoulos, a lawyer and expert on transparency issues, argues that the new legal framework lacks an effective mechanism to monitor whether public institutions are following the legal provisions on how to manage open data.⁵ According to the government, the law 4305/2014 assigns the Inspector General of the Public Administration with the task to judge under law and in essence the decision of the public sector body according to which a request for data was rejected. Also, the implementation of the law 4305/2014 falls under the audit of the Internal Audit Service of Public Administration. However, in an article on this issue, Mr. Sotiropoulos argues that the European Directive aims to assign the competency of monitoring the implementation of the access to information law to an Independent Authority that is specialized on this subject. According to Mr. Sotiropoulos article, the General Inspector of Public Administration has admitted that the government assigned him with the task to oversee citizens recourses for violations of the access to information law (3448/2006) without a prior consultation and also the Inspector agreed that this competence should not have been exercised by this institution.⁶

However, one year after the new regulatory framework was instituted, its overall implementation remains rather limited. At the time of writing (the end of September 2015), some struggle to follow the requirements of the open by default framework. Mr. Theodoros Karounos, Vice President of GFOSS, the leading civil society organization for OGP, believes that the three main reasons for the

problematic implementation include (1) the lack of an openness culture in the public sector, (2) the fact that the IT systems of the public sector are not designed to produce open data, and (3) the realization that, in Greece, motivation or punishment mechanisms are important to secure implementation of a law.⁷

Moving forward

The IRM research team recommends that the government should reevaluate its open data strategy and take action that responds to the structural problems that continue to hinder openness, despite an ambitious open by default policy. Suggested actions are as follow:

- Design various training programs targeted at developing certain open government skills (technical, cultural, and operational) for public sector employees, in cooperation with the National School of Public Administration;
- Identify good practices within organizations that are relatively advanced in releasing their data. Learn what worked well, enhance the efforts where appropriate, and try to spread these good practices to other organizations;
- Involve civil society members in the implementation of an open data law; organizations such as GFOSS and Vouliwatch have sent letters of interest during the September 2015 election period;⁸
- Consider a quasi-decentralized logic by empowering local administration to define their own concrete goals and to pursue local open data policies and open government action plans;
- Devise an agile open source scheme to modernize government IT systems that will produce data in open formats as soon as possible;
- Consider appropriate regulation that will advance the implementation of the law by instituting an incentive/disincentive framework.

1 Law 4305/14 incorporates Directive 2013/37/EU and establishes the open by default principle. Greek Republic, "Law No. 4305," Government Gazette, No. Sheet 237, 31 October 2014, [Greek] <http://bit.ly/1NZhTpf>

2 Detailed open data provision guidelines are available in Greek. Ministry of Administrative Reform and Electronic Governance, "General Policy and Address," Greek Republic, 8 January 2015, [Greek] <http://bit.ly/1R22p9U>

3 Ministry of Administrative Reform and Electronic Governance, "Open Data Follow-up Guidelines," Greek Republic, 19 June 2015, [Greek] <http://www.ydmed.gov.gr/?p=11238>

4 Dr. Vasiliki Dalaku, "The Legal Framework for the Open Publication of Public Information," (Presentation, 2014).

5 Vasilis Sotiropoulos, "What Is Wrong with the Draft Law about Open Data," Blog, E-Lawyer, 7 October 2014, [Greek] http://elawyer.blogspot.gr/2014/10/blog-post_7.html

6 Vasilis Sotiropoulos, "What Is Wrong with the Draft Law about Open Data," Blog, E-Lawyer, 7 October 2014, [Greek] http://elawyer.blogspot.gr/2014/10/blog-post_7.html

7 Theodoros Karounos, Vice President of the Greek Free/Open Source Software society (GFOSS), email interview with the IRM researchers, September 2015.

8 GFOSS and Vouliwatch, Open Letter to the Greek Political Parties regarding Open Government, 1 September 2015, <http://bit.ly/1NZhYck>

2.3. Central open data platform

Commitment Text:

Within the context of the implementation and operation of the Greek Government G-Cloud Datacenter, a new central site will be implemented for gathering, storing, disposing and searching open data and linked open data. It will consist of the open data portal data.gov.gr serving citizens and businesses for data retrieval, the website submit.data.gov.gr serving authorized officials in documenting, describing and disposing open data, and a set of specialized tools that through published APIs will deliver all necessary interoperability services for extracting information from systems, devices, applications and third party platforms. Thus the platform will (automatically) collect through standardized processes data generated from the IT systems of public bodies, and will make it available to citizens and businesses.

Milestones – Timescales

The milestones and implementation timescale have as follows:

- Signing of the implementation contract (July 2014)
- Implementation Study completion and commencement of pilot phase of the platform (November 2014)
- Roll-out of the platform with all the available open data sets (June 2015)

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): None Specified

Start Date: June 2014.....

End Date: June 2015

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
2.3. Overall			✓		✓						✓		✓			
2.3.1. Sign implementation contract				✓	✓					✓			✓			
2.3.2. Implementation Study and platform pilot phase			✓		✓						✓		✓			
2.3.3. Platform rollout			✓		✓			✓			✓				✓	

What happened?

This commitment aimed to take the experimental version of the national open data web platform to a new, fully operational level. The goal of the new data.gov.gr portal was to set up standardized processes for the automatic collection of data generated from the IT systems of public bodies and to make these available to citizens and businesses. Previously, no institutionalized capability existed that gave public access to datasets. According to the government, signing relevant contracts would create this infrastructure and require publication of government-held data; therefore, it represents an enabling step towards better access to information.

However, the implementation contract has not been signed and the study has yet to be completed; therefore, milestones 2.3.1 and 2.3.2 have been coded as not started. According to the commitment

text, the development of the new web platform was to be implemented as part of a contract in the context of the Greek Government G-Cloud Datacenter.¹ During an interview with the national contact point, the IRM research team found that the signing of this contract is expected in April 2016. To overcome this delay, the government decided that the design and development work for the data.gov.gr website should be carried out by in-house, Ministry of Interior experts. When the contract is finally signed, it will cover new functionalities and eventually will replace the existing website (data.gov.gr).

Milestone 2.3.3 has been substantially completed. According to a government OGP team representative, dataset uploading currently is not automated through interoperable information systems of the public authorities that own the data, as the commitment suggests. Instead, uploading is done manually. However, an automated solution is expected in 2016.

Did it matter?

An open data web platform that provides easy and timely access to available datasets for citizens and businesses is essential for any government committed to transparency principles. The new law that enforces the open by default policy, requiring government datasets to be public, and the rollout of the new version of data.gov.gr, has had an initial impact on government practices. This impact on access to information would take place during the second phase of the implementation of the commitment, after the study has been created and signed. The number of public agencies involved with opening their data and the volume of published datasets has increased. In March 2015 and before the rollout of the new platform, the data.gov.gr platform had 75 datasets from 20 organizations. In August 2015, after the rollout of the data.gov.gr platform, the datasets rose to 240 and the public agencies to 50. A month later, the number of datasets almost doubled and reached 454, while four more organizations were added to the list.²

According to Mr. Spyros Athanasiou, an open geo-data specialist from the public research center Athena, the overall technical quality of the data.gov.gr portal is low, due to errors in the metadata and license schemes. Also, the data.gov.gr website provided no response, despite repeated requests to republish data stemming from geodata.gov.gr data.³ The platform lacks special sections targeted to cover specific open data needs of businesses and civil society. Also, currently there is no interaction functionality to submit, receive, handle, and present various requests concerning existing and potential future datasets. As far as the user friendliness is concerned, the government argues that despite the fact that the platform was developed in-house, the completion of redesigning led to a better and more user-friendly database, significantly improved compared to its previous version. Furthermore, the government reports that it strives to deal with requests from the civil society in a timely manner. Despite these shortcomings, data journalists have used the datasets to analyze and to process datasets, such as such as Demetrios Pogas, who used Greek Fire Department data from data.gov.gr and developed a visualization of the fires in Greek forests in the period 2000-2014.⁴

Moving forward

In an interview with the IRM researchers, members of the government OGP team reported three major concerns for the immediate next steps. First, evaluate the project in terms of the benefits that accrue from the further exploitation of open data; second, create more internal communication activities to increase the number of public agencies that implement the law; and, third, develop contacts with academic and research institutions to examine topics regarding the further use of open data.

The IRM research team believes that the following recommendations would improve the data.gov.gr website considerably and would help reach the goals of this commitment by providing further relevance to the OGP values of access to information and civic participation:

- Design and execute user-needs qualitative research.
- Organize a deliberative open event with stakeholders from the public, civil society, and private sectors to present the findings and to reach consensus on future iterations of the data.gov.gr website.

- Consider regularly designing and publishing reader-friendly “how to” guides and glossaries to increase the open data literacy of the wider community systematically.
- Organize public consultations (online, as well as in-person) with the objective of deciding what web applications about transparency, accountability, participation, and social problems should be developed with the use of public data.
- Run hackathons and open innovation contests targeting the development of applications and web services.

1 G-cloud Projects List, [Greek] <http://bit.ly/1Ukk36v>

2 “List of Updated Available Open Datasets,” Data.gov.gr, <http://data.gov.gr/>

3 Spyros Athanasiou, Senior Project Manager at Athena-Research and Innovation Center in Information, Communication and Knowledge Technologies, interview with the IRM researchers, 7/9/2015.

4 Demetrios Pogkas, “Forest Fires in Greece 2000-2013: Methodology,” Blog, 20 July 2015, <http://bit.ly/1jJB400>

2.4. Open geospatial data

Commitment Text:

The Ministry of Environment, Energy and Climate Change will be responsible for the coordination of the provision of geospatial data from all public administration bodies. The providers will produce and manage their geospatial data and then provide the data to the Ministry, who in turn will make it available in designated format (e.g., oversized paper maps or data sets). Therefore, it is especially important to tag the geospatial data records with appropriate metadata, so that the records can be easily accessed, retrieved and combined with other data sources.

For this purpose, the Ministry of Environment, Energy and Climate Change will prepare all the necessary legislative acts and it will define a specific business process for the provision of data. The provided geospatial data will be publicized through the website of the National Geospatial Information Infrastructure following technical standards and procedures to be established. Also the data will be posted on the Central Governmental registry data.gov.gr.

Milestones –Timescales

The exact Action Plan depends on the roadmap of Directive 2007/2/EC implementation and it will have to be completed by June 2016. During the consultation processes for the development of the current Action Plan, critical geospatial data sets have been identified. Indicative list:

Provide geospatial registry the set of ortho-photos and any other cartographic backgrounds of EKCHA SA (formerly Casadstre SA)

Convert and provide OKXE SA archive in digital format

Provide data on environmental protection areas (Natura, etc)

Editorial Notes:

- The terms "National Geospatial Information Infrastructure (NGII)" and "National Spatial Data Infrastructure (NSDI)" are used interchangeably to refer to the central database of spatial data to be maintained and publicized by the Greek authorities
- OKXE SA refers to the former "Hellenic Mapping and Cadaster Organization SA" or HEMCO SA
- The names "EKCHA SA" and "EKXA SA" refer to the "National Cadaster and Mapping Agency SA", abbreviated as "NCMA SA"

Responsible Institution: Ministry of Environment and Energy

Supporting Institution(s): None

Start Date: Not Specified.....

End Date: June 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
2.4. Open geospatial data		✓			✓					✓				✓		
2.4.1. Geospatial registry and EKCHA SA		✓			✓					✓			✓			
2.4.2. OKXE SA archive in digital format		✓			✓					✓				✓		
2.4.3. Environmental protection areas data		✓			✓					✓				✓		

What happened?

The goal of committing to providing open geospatial data is to streamline public access to a series of geospatial datasets in the appropriate format and with the correct license. Thus far, there is no

evidence to prove the fulfillment of milestone 2.4.1, and the Ministry has shown only limited progress in the implementation of milestones 2.4.2 and 2.4.3. Furthermore, there is no specific indication of how they shall be fully implemented.

Currently, the Organization of National Infrastructure of Geospatial Information (OKXE) has the mandate to provide direct and free access to geospatial information for the citizens and public administration.¹ Thus far, the Ministry provided the datasets by September 2014 in PDF format, which is far from satisfactory for open data uses and applications. Additionally, as of September 2015, the IRM researcher team found that the website was last updated in March 2013.² At present, the government has not indicated how or when the data will be released.

The milestones are qualified with a low specificity level. The action plan refers to the implementation of the EC Directive as a prerequisite for fulfilling the commitment. The IRM researchers found that during 2013 and 2014 the Greek government did not implement any actions to develop the NSDI. This has resulted in failure to comply with several international commitments and the implementation of EU directives regarding spatial data, the most important of which being the INSPIRE directive. The action plan proposes the completion of intermediary steps that are expressed in vague language, for example, “The Ministry of Environment and Energy will prepare all the necessary legislative acts and it will define a specific business process for the provision of data.” Additionally, the action plan currently provides an indicative list of milestones to fulfill the commitment, which means that there is a high probability that additional milestones will be required in the future for its completion. According to the competent Ministry, among the main reasons for this failure is the complexity of the procedures introduced by the current legislation (law n.3882/2010), the lack of collaboration among public stakeholders, the ineffectiveness of the organizational schemes, as well as the additional need for compiling the required Implementation Acts.

Did it matter?

Making public geo-data available in the appropriate formats can have a positive impact in enabling citizens to hold the government accountable in environment protection issues. It could also play an important role in the development of smart applications and innovative services that contribute to economic growth. However, beyond the subset of data that has already been available for many years, such as the data in the OKXE website and the NATURA areas, there is no indicative plan or timetable to release any additional data regarding the milestones 2.4.2 and 2.4.3.¹ Hence the potential impact is minor.

Moving forward

The IRM research team suggests the Ministry of Environment and Energy should make public a detailed and time bound outline of how it plans to move forward with the milestones of this commitment. Additionally the Ministry should seek support from other stakeholders from the public sector and civil society who have proven expertise on the different issues addressed in the action plan.

Regarding the release of geospatial data as a whole, public sector specialists need to be included in the elaboration of definitions of licensing and metadata schemes and in developing the systematic means by which data should be organized and published.

Include civil society organizations such as the Athena Research Center and take advantage of the expertise they have developed with the creation and maintenance of the Center’s website (geodata.gov.gr).

The government should support the priorities of the geodata.gov.gr initiative and the Athena Research Center to:

- Improve geodata.gov.gr in the context of research projects (PublicaMundi.eu, GeoKnow.eu) and forge international partnerships

- Train the users in the opening of data with a focus on issues of quality and metadata (Geodata Camps, Units of Excellence)
- Open data with a focus on selective requests for specific datasets of high value.

1 Organization of National Infrastructure of Geospatial Information (OKXE), <http://bit.ly/1R4kCUu>

2 Last Update, OKXE, <http://bit.ly/10AWisE>

2.5. Open cultural data

Commitment Text:

The Ministry of Culture and Sports, as well as supervised public bodies, are going to publish cultural data that falls within the definitions of public information of Directive 2013/37/EU. These data sets are to be provided for re-use by citizens, academic institutes and enterprises in order to contribute to the development of the national cultural product.

Milestones – Timescales

- Amendment of the legal framework and more specifically of Law 3448/2006 with the adoption of new regulatory acts. Also modifications (where necessary) on ministerial decisions regarding the provision of cultural content of Law 3028/2002. This will lead to further amendments for the sectorial – sectoral legislation (completion by the end of 2015)
- Completion of the National Digital Archaeological Cadastral Registry which will make possible the publication of the cultural data (completion by the end of 2015)
- Implementation of interoperability services for the re-usability of cultural data from third party bodies, academic institutions and individuals (completion by the end of June 2016)

Responsible Institution: The Ministry of Culture and Sports

Supporting Institution(s): None

Start Date: 2015.....

End Date: June 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
2.5. Overall			✓		✓						✓			✓		
2.5.1. Legal amendments			✓		Unclear						✓		✓			
2.5.2. National Digital Archaeological Cadastral Registry			✓		✓						✓			✓		
2.5.3. Interoperability services		✓			✓					✓				✓		

What happened?

The goal of the completion of a National Digital Archaeological Cadastral Registry is to harness the power of modern information and communication technologies to promote cultural content. It will consist of an integrated informational system and a web portal called “GAIA” that will enable everyone to access and process cultural information.¹ Cultural information comprises of data on architecture, paintings, archeological collections, historical manuscript collections, and similar, culturally significant pieces. The use of open cultural data, for developing web and mobile applications for the creative industry or tourism was one of the topics of an open contest that the National Center of Documentation organized.²

Overall, progress in the implementation of this commitment is limited. The amendments to the legal framework have not been introduced and the government still needs to complete the National Digital Archaeological Cadastral Registry and to implement the interoperability services.

The Ministry of Interior and Administrative Reconstruction has pressed for the adoption of the open by default policy, which would require the publication of certain government-held documents and data. However, this policy does not specifically include the publication of cultural data. The government held consultations during the creation of the open by default policy,³ where civil society representatives requested clarity on what data could be justifiably excluded from publication and why. It remains unclear whether the open by default policy suffices to cover all the outstanding legal issues that are mentioned in the commitment; therefore, these amendments are essential to ensure access to cultural data.

At the end of the first year of implementation, the milestone concerning the completion of the National Digital Archaeological Cadastral Registry has limited completion, although progress is ongoing. According to an announcement from the Ministry of Culture, the launch of an integrated information system and a web platform GAIA, presenting cultural heritage information, were expected in December 2015.

The action plan calls for, “Completion of the IT project for the digitalization and provision of open data regarding the Digital mobile monuments of National Monuments Registry” as a prerequisite to fulfilling Commitment 2.5.3. The Ministry of Culture released six datasets on the data.gov.gr platform. Thus far, the government has made the following data public: a catalogue of monuments with geospatial information, a catalogue of museums with postal addresses, opening hours for monuments and museums, a catalogue of the Ministry of Culture’s public services by postal address and region, and a catalogue of archaeological sites by region, postal address, and type.⁴ Since the government has satisfied the prerequisites to the commitment, the IRM research team qualifies the implementation of interoperability services for the reusability of cultural data as limited completion.

Did it matter?

Open cultural data is important because Greece’s abundant archaeological sites and history have potentially a large amount of data that should be available for public consumption. Citizens could play an important accountability role in the formulation of policies to preserve and promote cultural artifacts and heritage. Additionally, an integrated informational system and a web portal enabling public access to cultural information⁵ helps the general public, tourists, and interested start-up entrepreneurs to understand the cultural content, to better use information, and possibly to develop web and mobile applications. The IRM researchers evaluate this commitment as having moderate potential impact. However, concerns remain about the lack of time-bound milestones on the release of information. Without regular data releases, the overall ability to make sense of cultural data would be affected.

Moving forward

The Ministry has indicated that it conducts some additional actions to fulfill this commitment such as:

- Developing a platform providing digital services related to licensing procedures.
- Developing an online platform publishing acts and decisions of various Councils of the Ministry in digital form.

As far as the legal framework is concerned, the Ministry will complete the required actions regarding the Law 4305/2014, giving priority to the flow regarding the issuance of the respective decision. A detailed description of the datasets will be available, concerning both Culture and Sports (the two subjects of the Ministry) which will be open and machine readable. Further analysis on these activities will be provided in the end of term report

The IRM researchers recommend that the Ministry actively try to involve selected civil society organizations, start-up companies active in the field of tourism, and other stakeholders from the public and private cultural sector in the planning and execution stage of these commitments.

Further, the Ministry should indicate clearly how it would avail the legal amendments of the commitment publicly. For example, these amendments could be made available for public consultation beforehand on the www.opengov.gr website. They also should be easily accessible after their introduction at both the Ministry’s and the National Printing House’s websites.

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- 1 Evolution of the National Digital Archaeological Cadastral Registry Project, press release, 24 March 2015, [Greek] <http://bit.ly/1R4kR1I>
 - 2 National Documentation Centre, "Call for Applications for the #HackEKT Competition," [Greek] <http://bit.ly/1jBh3k>
 - 3 "Consultation for Open by Default Data, Former Ministry of Administrative Reform and E-governance, [Greek] <http://bit.ly/10ybBMz>
 - 4 "Datasets List," Ministry of Culture, [Greek] <http://data.gov.gr/organization/yppo>
 - 5 Evolution of the National Digital Archaeological Cadastral Registry Project, press release, 24 March 2015, [Greek] <http://bit.ly/1R4kR1I>

2.6. Open data for offshore companies

Commitment Text:

The Ministry of Finance will provide the list of all foreign companies (offshore companies) registered in Greece in a machine readable format. The information that will be published will contain the following: Taxpayer Identification Number (TIN), contact details in Greece, information on operations, company name, distinctive title and other relevant information registered for the holding company (TIN of the offshore, country, address, etc.). This information will be accessible and updated in monthly basis (at least).

Milestones –Timescales

The commitment will be completed by the end of October 2014. This includes software implementation for the population of the data sets. After that, the mechanism for publishing the data will be implemented by the end of March 2015.

Responsible Institution: Ministry of Finance

Supporting Institution(s): None

Start Date: July 2014

End Date: March 2015

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
			✓		✓			✓			✓		✓			

What happened?

To curb tax evasion and financial fraud in Greece,¹ with this commitment, the Ministry of Finance proposed to release data on offshore companies. It aims to enhance scrutiny over companies that may be engaging in tax evasion or money laundering. However, the implementation of this commitment has not yet started. During the first year of the action plan, neither the central open data portal (data.gov.gr), the Ministry of Finance (www.minfin.gr) nor the General Secretariat of Public Revenues website (<http://www.publicrevenue.gr/kpi/>) showed offshore companies datasets. At a meeting with officials from the Ministry of Finance, the IRM research team found two main reasons for this. First, it is unclear who is responsible for the commitment within the Ministry of Finance. Second, despite the fact that the commitment text refers specifically to the targeted dataset including all offshore companies without exceptions, for some stakeholders within the Ministry, the definition of offshore companies is problematic because technically there is more than one type of offshore company.

Due to the lack of implementation, it remains to be seen whether this commitment will produce results at the end of the action plan cycle.

Did it matter?

This commitment addresses the value of access to information regarding offshore companies' data. This commitment could have had transformative potential impact; however, the language of the commitment does not assign a government agency with the responsibility for implementation. Additionally, the release of datasets is not enough to resolve all the issues involved with regulating offshore companies. The release of data could inspire advocacy for structural reforms of the fight against the financial fraud affecting the Greek economy. By releasing the contact information of offshore companies, stakeholders will be able to engage in "naming and shaming" campaigns. As written, it is unclear how this commitment will increase the accountability of offshore companies to the general public or how it will serve as a deterrence mechanism with corresponding legal

consequences for misconduct. Therefore, the IRM researchers found that this commitment is of moderate potential impact.

Moving forward

Officials from the Ministry of Finance believe that the most important step to fulfill this commitment is to assign a specific agency the responsibility to oversee its implementation. This requires a joint political effort from the General Secretaries of the Ministry to request the General Directors to appoint one person or a team to oversee the implementation of this commitment. Officials from the Ministry of Finance indicate that a working group has been assigned to define the criteria under which a company qualifies as an off-shore. Also, there is a critical decision on tax confidentiality according to the article 17 of Law 4174/2013 that is also pending. The results of these ongoing efforts will be presented in the end of term report.

The IRM research team suggests developing an integral strategy that requires more than releasing the datasets, an action that is insufficient to curb the engagement of illicit activities related to tax evasion or financial fraud. It is recommended that the Ministry move forward with a redefinition of the commitment. It should contain specific steps to achieve concrete goals that address directly access to information and accountability issues. It is necessary to identify the persons responsible for carrying out each part of the commitment, and it is necessary to define clearly the benefits and uses of developing and publishing software, datasets, and APIs openly.

¹ Ioanna Zikakou, "Over 23,000 Offshore Companies with Profitable Activity in Greece," Greek Reporter, 29 November 2014, <http://bit.ly/1JjBmEh>

2.7. Open public sector datasets

Commitment Text:

The commitment pertains to the provision of open data sets, for free, related to areas of taxation, trade and public procurement. No legislative act is required. The main restrictions involve the technical implementation and readiness of stakeholders. Those data sets will be available to open and machine - readable formats through the governmental portal data.gov.gr.

The data sets are:

- Taxation:
 - Local tax offices productivity
 - Number of tax validations and infringements by geographical breakdown
 - Analysis of the central governmental budget by Expense Identification Number
 - Statistics on financial crime
 - Statistics on individuals and legal entities pertaining to VAT and taxes
- Public Procurement:
 - Public procurement data sets from the Central Electronic Public Procurement Registry(<http://www.eprocurement.gov.gr>)
 - Data sets on projects financed by the NSRF, from the monitoring information system of the NSRF (<http://destaerga.gr/>)
- Commerce:
 - Price data from the Observatory of tuition fees (<http://app.gge.gov.gr/>)
 - Data from the business registry (<https://www.businessregistry.gr/>):
 - For legal entities: VAT Number, Registry id, Company Name, distinctive title, Local business registry Office, Company legal status (active, bankrupt, etc.), headquarters address, postal address, capital allocation, management information, legal representatives, website, e-commerce website.
 - Information on the corporate changes: Date and type of change
 - Administrative documents: Notices produced by the business registry services
 - Private documents: The balance sheets of companies

Milestones –Timescales

- Taxation: Mechanism for data generation preparation (June 2015). Dataset provision (March 2016)
- Public Procurement and NSRF projects:
 - Data form of electronic procurement system (June 2015)
 - NSRF project data (May 2015)
- Commerce:
 - Price data from the Observatory for the tuition fees (December 2014)
 - Data from the business registry (January 2015)

Responsible Institution: Ministry of Finance

Supporting Institution(s): None

Start Date: July 2014

End Date: March 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
2.7. Overall				✓	✓						✓		✓			
2.7.1. Taxation datasets				✓	✓						✓		✓			
2.7.2. Public procurement datasets				✓	✓						✓		✓			
2.7.3. Commerce datasets				✓	✓						✓			✓		

What happened?

The idea behind this commitment was the result of an OGP initiative from the Ministry of Finance and is an extension of the effort to open offshore company data (Commitment 2.6). This commitment seeks to release specifically defined datasets in open data and machine readable format on three Ministry of Finance-related policy areas: taxation, trade, and public procurement.

Implementation of this commitment has not started yet.¹ The reason for the delay is that the responsibility to oversee all the necessary steps for implementation of this commitment has not been assigned to a specific government agency. Regarding milestone 2.7.3, the IRM researchers found that a previously published searchable database of tuition fees was available in .xls format on the National Observatory of Athens website for tuition fees. However, there is no information on whether data from business registries has been made public. The IRM researchers evaluate milestone 2.7.3 as having limited completion. Since only phase one of milestone 2.7.3 was completed before the adoption of the action plan and significant work is still required to fulfill the goals of the commitment, the IRM researchers believe that the overall completion of this commitment remains functionally not started.

Did it matter?

Published datasets pertaining to taxation, public procurement, and commercial activities could be of crucial importance, especially in the context of the Greek crisis and as far as fiscal policies are concerned. According to European Union statistics, the yearly tax evasion on VAT in Greece reaches 6.5 million euros.² Moreover, the Business Anticorruption Portal³ concluded that three-quarters of households perceive abuse and bribery to be widespread among tax officials. The proactive publication of taxation data concerning tax infringements and financial crime would enable authorities and civil society organizations to discover trends and patterns that could trigger solutions which ultimately could optimize revenue flow. In regards to openness in public procurement, the OECD found that Greece has among the lowest public procurement expenditures in relation to GDP in the EU.⁴ However, in light of the Greek financial crisis, making public procurement as fair and efficient as possible is one way to reflect the government's reform efforts and to reestablish trust in the government from both the rest of the world and their citizens alike.

For this reason, the IRM researchers believe commitment 2.7 could have a moderate impact.

Moving forward

The Ministry of Finance needs to demonstrate significant effort to restart the present commitment in terms of both ownership and human resources that should be made available for implementing this commitment.

The IRM research team suggests a more targeted and prioritized approach. Releasing the datasets is not an accomplished reform. The government must develop a strategy that identifies the person responsible to implement the commitment, and the government must clearly define the benefits and uses of publishing taxation, procurement, and commerce datasets.

1 Ministry of Finance Directors, interview with the IRM researchers, September 2015.

2 "European Commission: For Every 1000 Euros VAT to Greece Lost 35," Kathimerini, 29 September 2015, [Greek] <http://bit.ly/1RUWIKN>

3 <http://bit.ly/1OHFI4I>

4 Guest Author, "The Facts About Greece," Debate the Issues, OECD Insights, 2 July 2015, <http://bit.ly/1NAQZFd>

Theme 3: Integrity and accountability

3.1. Open public sector job posts

Commitment Text:

Introduction of an open system in the selection of executives serving for a fixed period of time in positions of responsibility in the public sector. This system will replace the current process of appointments to positions of increased responsibility. The system will include interventions in the following areas:

- Institutional level: Establishment of an open selection process for executives. The process will define the minimum required qualifications and all the information regarding the selections will be publicly available.
- Operational level:
 - Proposal for an integrated process, including the selection of members of the Selection Committee, the publication of the call for interest in www.opengov.gr and the publicity of selection practices. Draft law proposal.
- Technical level:
 - Collection and publication of data to the executive job market, as well as the internal job market. It will record all vacancies, the expiration date of the filled posts, the requirements of the post and the supervising entity.
 - Extension of the Census database application

Milestones – Timescales

- Regulatory interventions: Completion by the end of March 2015
- Operational and technical changes: gradually until end of September 2015. A plan to implement changes will be drafted by the end of 2014, in order to gradually introduce the new system.

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): None

Start Date: July 2014

End Date: September 2015

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
3.1. Overall			✓				✓					✓	✓			
3.1.1. Regulatory interventions			✓				✓					✓	✓			
3.1.2. Operational and technical changes			✓		✓		✓					✓	✓			

What happened?

This commitment aims to tackle the deficiencies of the ad hoc operation of open calls for public sector positions. As of October 2009, the www.opengov.gr website operates on an ad hoc basis as a public appointments platform for high-ranking positions (e.g. managers, members of the board of directors, directors of public entities, and some consultant positions). However, this kind of operation is neither mandatory nor institutionally enforced. Thus, since its inception, all open calls for recruitment on the [opengov.gr](http://www.opengov.gr) website and the selection process depend on the political will of the relevant minister or authority.

The implementation of this commitment has not commenced yet. During the period of implementation, open calls continue to operate on an ad hoc basis. This means that the publication of calls happens sporadically, and there is no institutional guarantee of a fair evaluation or meritocratic selection of candidates that apply for positions of increased political responsibility.

Did it matter?

In 2011, a New York Times article cited a local press investigation, which found that the workforce in Greece's Parliament was so bloated that there were not enough desks in place for the number of employees on the payroll.¹ Previous attempts to curb the patronage system in the Greek bureaucracy have been met with strikes and negative political repercussions for reform-minded politicians. Even when violations are uncovered, there is no guarantee that sanctions will be imposed. For example, the General Inspector of Public Administration, who has the mandate to promote values of legality, integrity, transparency, and accountability in the Greek Public Administration, found in a 2014 report² that the University of Thessaloniki's public appointment methods violate Greek regulations on public appointments. However, the problem is that the General Inspector does not have enforcement powers, and the report only denounces the illicit activities without providing further recommendations for reforms.

This commitment aims to tackle deficiencies of the public sector recruitment process by putting in place potentially transformative reforms that would increase transparency and tackle potential cronyism and favoritism in public appointments. However, due to the fact that the implementation has not yet started, open calls still operate in a limited and hardly predictable fashion. Only a small subset of high-ranking positions was published with open calls. Much of the rest of such appointment processes remains in opacity.³ Published open calls only include the description of the positions, required qualifications, and an online CV submission form. In practice, this means that there is no proof of the evaluation criteria for the candidates or documentation of the final selection.

Moving forward

Implementation of this commitment requires widespread political and social consensus on the necessity of reforming a system of political appointments based on clientelism. A viable next step for the institutionalization of a fair and meritocratic public appointments system, in the light of the recent MOU between Greece and its lenders on the political depoliticizing of the public sector,⁴ is for the government to introduce a draft law on high-ranking public appointments. The law should provide a clear and concise list of positions, qualifications, and selection and validation processes, while regulating all associated operational and technical issues. This legislation should be a step towards the adoption of a comprehensive Code of Practice for Public Appointments, overseen by an independently operating Commissioner.

Moving forward the government needs to (1) involve civil society in the implementation of this commitment to push for the required institutional changes and (2) reevaluate the deadlines established for this commitment.

1 Suzanne Daley, "Bureaucracy in Greece Defies Efforts to Cut it," New York Times, 17 October 2011, <http://nyti.ms/1R22SZs>

2 General Inspector of Public Administration, "Annual Report 2014" (Report, Athens, June 2015), [Greek] <http://bit.ly/22CpPPG>

3 Since 2009, the Greek Open Gov Website (opengov.gr) publishes open calls for a number of public appointments. "Open Governance," Ministry of Interior and Administrative Reconstruction, <http://www.opengov.gr/home/?cat=24>

4 Eurogroup, "Eurogroup Statement on the ESM Programme for Greece," Statement and Remarks, General Secretariat of the Council, 14 August 2015, <http://bit.ly/1R239LX>

3.2. Public administration organizational chart

Commitment Text:

The Greek Government will publicize the organizational structure of all public administration bodies, down and including the head of department level. At each node, there will be information pertaining to contact details and description of responsibilities. The goal is to have the organizational chart accessible publicly, available to everyone, in open and machine-readable format, and updated in real time. This will also act as a registry of all the public administration organizations in Greece

Milestones -Timescales

- Implementation of an IT system which will support the storing, updating and publication of public administration bodies organizational charts (September 2014).
- Creation and updating of organizational charts of public administration bodies participating in Transparency initiative (June 2015).
- Creation and updating of organizational charts of remaining public administration bodies (December 2015).

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): None

Start Date: September 2014

End Date: June 2015

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
3.2. Overall				✓	✓			✓		✓					✓	
3.2.1. Organizational chart IT system				✓	✓			✓		✓					✓	
3.2.2. Organizational charts for Transparency Initiative				✓	✓			✓		✓					✓	
3.2.3. Organizational charts for public administration				✓	✓			✓		✓		✓				

What happened?

This commitment aims at providing a unified format and framework for the publication of existing and new public agency organizational charts in open and machine-readable format. Publication of public body organizational charts currently takes place on an ad hoc basis, and they are usually displayed in different formats on the webpages of individual public agencies.

When the new version of the Diavgeia website was made public, it included the technical capability of automatically presenting the organizational charts of the public agencies that are legally obliged to participate in the Transparency Program.¹ The government acknowledges some outstanding issues in fulfilling this commitment.² These include the presentation of certain information in the organizational charts such as the head of each department and the specific responsibilities for every organizational unit. Furthermore, as the text of the commitment refers to all public administration bodies, the inclusion of the charts for public agencies that do not participate in the Diavgeia is also

pending. Therefore, the IRM researchers found that milestones 3.2.1 and 3.2.2 are substantially completed, while milestone 3.2.3 has not been started.

Did it matter?

In essence, the commitment is meant to create a transparency and accountability with the publication of organizational charts for public entities. This is important because, as previously mentioned in Commitment 3.1, international news investigations have found that the Greek civil service suffers from significant bloating in the workforce. Currently, a visual organizational chart is generated automatically by the Diavgeia information system. It contains department titles and hierarchy with no additional in depth information or context. Beyond a mere depiction of hierarchy relations, the publication of organizational charts is important because it allows citizens to have a clearer idea of the structure of each public agency, the responsibilities, job descriptions, and contact details of their workers. The release of this information is an incremental but positive step in the promotion of access to information, for this reason the IRM research team believes it will have minor impact.

Moving forward

The Ministry of Interior and Administrative Reconstruction could take steps to improve the visual interface and user experience of the relevant part of the platform. It also could try to relate what now looks like an internal commitment closer to OGP values of accountability. For example, it could include elements of accountability for heads of departments by including performance and evaluation data on the platform. These data in turn could assist in the future with possible process reengineering efforts that could involve participatory methods like crowdsourcing. For example, the Department for Process Simplification in the Ministry of Interior could use these data to locate inefficient workflows and either deal with this internally or open the challenge to civil society through crowdsourcing methods.

The IRM researchers recommend that future activities on this commitment include amending the national law with a provision on linking names to salaries within the Diavgeia system. However, currently there are no plans to do so.

1 "Organizational Charts," Diavgeia, [Greek] <https://goo.gl/QTIXed>

2 National Contact Point, Greek Open Government Partnership, interview with the IRM researchers, September 2015.

3.3. Open government policy

Commitment Text:

Enhancing accountability and the fight against corruption directly depend on the strengthening of audit mechanisms in public administration bodies. The Greek government is currently evaluating and re-engineering the organization of all Ministries. In this context, an organizational unit for Internal Audit will be set up in each Ministry. These units will be responsible for aiding and verifying the compliance to the Open Government policy, fundamental principles, as well as successful implementation of the open government projects undertaken by the Ministry.

In the Ministry of Administrative Reform and e-Governance, there will be a unit coordinating and monitoring the implementation of the open government Action Plan and values on a national level.

Milestones – Timescales

Activation of new organization structures (end of June 2015)

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): None

Start Date: September 2014

End Date: June 2015

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
		✓			Unclear						✓			✓		

What happened?

Currently, there is no open government policy subject to a concrete legal mandate. The adoption and implementation of such policies is largely dependent upon the will and the priorities of the incumbent political figures. Therefore, this commitment aims to establish permanent institutions with a concrete legal mandate and adequate enforcement power to coordinate open government policies in all ministries.

The implementation of this commitment is limited. A first step towards the implementation occurred in August 2014 with the adoption of Presidential Decree 99/2014, art. 11. It mandates the creation of a Transparency, Open Government, and Innovation Department within the Ministry of Interior and Administrative Reconstruction¹ with the responsibility to implement, design, monitor, and optimize open government and open data policies. According to officials from the Ministry of Interior and Administrative Reconstruction, the Department deals with a) the issuance of guidelines, b) the organization of meetings, teleconferences with all public entities (such as Ministries, Independent Authorities, Inspectorate Bodies, Research entities, Local Government Organizations – municipalities and regions) and c) the continuous provision of clarifications to all entities of public administrations for the effective implementation of the open data policy. Although the above activities are critical for the operational support of the wider policy area, this structure lacks adequate enforcement powers because a Department stands at the lowest hierarchy level of public administration.

Nevertheless, the commitment for the coordination and monitoring of open government policy aims to promote the establishment of Internal Audit Units across all ministries. The Minister of State for Combating Corruption was expected to play a role in coordinating these permanent institutional structures, but there is still no mandate or description of what their responsibilities will be to promote and monitor the implementation of an open government policy.² It also should be noted

that the Ministry was abolished following the September 2015 election, and its mandate transferred to the Ministry of Justice.

Did it matter?

Despite the importance of coordinating and monitoring open government policy, this commitment in effect addresses an internal administrative issue and bears no direct relevance to OGP values. The IRM research team believes that the creation of institutional units across the public sector to enforce and monitor open government policies could have an overall positive effect. To some extent it would guarantee continuity in the implementation of a national plan on open governance. This is of paramount importance for OGP activities in Greece, which have suffered due to numerous changes in government oversight agencies. Nevertheless, this commitment appears to be too ambitious to be completed in the timeframe proposed. A single ministerial department does not have the capacity to mobilize all other agencies for the implementation of the action plan. Additionally, the Greek Government has not paid attention to the OGP action plan, due to the economic difficulties the country endured in the past years. Therefore, the IRM researchers found this commitment to have a moderate potential impact.

Moving forward

The government suggests that a new Project Management Team should be formed to undertake the coordination of OGP implementation. The mandate of this team must be independent from the national representative. The composition of the team should be interministerial, including responsible contact points who will own specific commitments across different ministries or public agencies. It also should include representatives from the Hellenic Parliament.³

The IRM research team believes that a Project Management Team is necessary and suggests the following to further enhance its performance:

- Core members of the Project Management Team should report and be answerable directly to the highest political level, either a special General Secretary with a wide mandate on openness issues or the office of the Prime Minister;
- The Project Management Team should include members from the civil society sector of OGP stakeholders, selected via an open call, for a one-year term;
- The decision that creates the Project Management Team task also should define in detail a permanent stakeholder consultation process and the persons responsible for it;
- The function of the Project Management Team should be designed to operate in a model of transparency, participation, and accountability relevant to OGP. This model could prove to be transferable to other public organizations in the future.

1 Greek Republic, "Presidential Decree 99/2014," Government Gazette, First Issue No. 166 Sheet 5363, 28 August 2014, [Greek] <http://bit.ly/1KT58u0>

2 Nancy Routzouni, the National Contact Point for the Open Government Partnership, and Nicoleta Charalambopoulou, Member of the Open Government Partnership Working Group, working meeting with the IRM researchers, September 2015.

3 Nancy Routzouni, the National Contact Point for the Open Government Partnership, and Nicoleta Charalambopoulou, Member of the Open Government Partnership Working Group, working meeting with the IRM researchers, September 2015.

3.4. Strategic alliance against corruption

Commitment Text:

The commitment consists of two main parts: The first one refers to the development of a strategic alliance with inspectorate and anti-corruption bodies and authorities, and the second one addresses the reorganization of inspectorate bodies.

Under the framework of the e-government strategy, a comprehensive study will be conducted regarding the development of strategic alliance with inspectorate and anti-corruption bodies and authorities. Among other areas of interest, the study will also include identification of: main inspectorate and anti-corruption bodies and authorities; co-operation opportunities with public administration entities; areas, models and ways of cooperation; public administration units that could participate in this strategic alliance, prerequisites and conditions for cooperation; proposals on the ways of implementing strategic alliances in practice; expected results, possible problems and risks/ways to address them; infrastructure and legal framework required. Within their role, inspectorate bodies detect possible weaknesses in public administration and identify areas where efficiency could be improved. The empowerment of those bodies is highlighted as a priority and could be achieved through mapping the current situation, identifying areas of improvements undertaking targeted actions to facilitate their ongoing work. The ultimate goal is to ensure optimal coordination of actions and enhance the effectiveness, efficiency and accountability of the public administration.

Milestones – Timescales

- Study on reorganizing and empowering interspectorate bodies (end June 2015)
- Study on the development of strategic alliance with interspectorate and anti- corruption bodies and authorities (end December 2015)

Responsible Institution: Ministry of Interior and Administrative Reconstruction

Supporting Institution(s): None

Start Date: July 2014

End Date: December 2015

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
3.4. Overall				✓	Unclear					✓				✓		
3.4.1. Study on inspectorate bodies				✓	Unclear					✓			✓			
3.4.2. Study on strategic alliance				✓	Unclear					✓				✓		

What happened?

This commitment aims to reorganize and empower inspectorate bodies and to develop a strategic alliance for fighting against corruption, a key problem by Greek public opinion.¹

The Greek Government has not implementing the first milestone on producing a study for reorganizing inspectorates. Progress also has been limited on the second milestone for the alliance against corruption. Nevertheless, cooperation between the Ministry of Interior and Administrative Reconstruction and relevant inspectorate and anticorruption bodies and authorities takes place on an ad hoc basis and in the context of the YourDataStories project implementation.² In fact, the government implements this commitment via a pilot scenario in the YourDataStories project.

YourDataStories is a collaborative European project on the creative use of open data to tell stories. The Ministry of Interior is a partner to this project and hopes to add value to existing OGP

commitments. To implement commitment 3.4, the government plans to cooperate and train journalists, members of the Greek public administration, and auditing authorities such as the General Inspector of Public Administration and the Single Public Procurement Authority (SPPA) to provide the skills to reuse information for unexpected purposes, to monitor the action, to evaluate the performance of all the inspection bodies/units of public administration, and to detect corruption and misadministration.

Did it matter?

Neither study, as described in the language of the commitment, has begun because the higher levels of the Ministry's administration have not approved them yet. The government has substituted in the YourDataStories project for these milestones. However, since the YourDataStories project is an independent project that was not adopted and implemented with the OGP action plan in mind, its relevance is not always clear. Additionally, the studies of milestones 3.4.1 and 3.4.2 have general goals, but they lack specific, time-bound actions with a high level of ambition to study and address corruption effectively, which undermines its potential impact.

Corruption is a prevalent issue in Greece; however, implementation of this anticorruption commitment is not under the proper government agency. The frequent administration changes brought on by numerous elections have hampered the implementation of this commitment. For example, the Ministry of Justice, Transparency, and Human Rights now enforces anticorruption initiatives, but the Ministry is not identified as the responsible institution for this commitment.

Milestone 3.4.2, the strategic alliance, could be important for coordinating interministerial anticorruption strategies; however, the Ministry of Justice, Transparency, and Human Rights needs to be involved for any anticorruption commitment to have significant potential impact. Therefore, the IRM researchers found this commitment had only minor potential impact.

Moving forward

The government should examine and organize its anticorruption policy in response to the lack of coordination among the different bodies in the fight against corruption. Understanding that the responsibility to address anticorruption issues has shifted to the Ministry of Justice, Transparency, and Human Rights, the IRM researchers suggest transforming this commitment and providing a new framework that tailors to the current reality. The government should prioritize areas in their anticorruption strategy, set up a primary goal for each area, and design specific interventions for the next action plan. The IRM researchers believe that possible areas for intervention include hospital/other public procurement and expenses, areas a recent EU Commission anticorruption report identified as most prevalent,³ as well as driving license bribes and undeclared labor.⁴

1 "Transparency International Corruption Perceptions Index 2014: Results," Transparency International, 2014, <http://bit.ly/1QfofpE>

2 Open Government Partnership National Contact Point, interview with the IRM researchers, June 2015.

3 EU Commission, "EU Anti-Corruption Report" (Report, Brussels, 2014), <http://bit.ly/1fnW8yD>; EU Commission, "Annex Greece to the EU Anti-Corruption Report," (Annex, Brussels, 2014), <http://bit.ly/1morYW8>

4 "Greece: The Cost of a Bribe," Surveys, Transparency International, 3 April 2012, <http://bit.ly/1ky0Np0>

Theme 4: Open parliament commitments

4.1. Track changes on bills

Commitment Text:

The original text of bills is amended through various stages of processing, from the parliamentary committee level to voting in the Plenum. Commitment 1 is a basic requirement for legislative process documentation, aiming to achieve the adoption of a system that a) monitors the status and history of actions during processing of the bills by the Parliament, b) assists the production of different versions and c) allows for quick distribution, both internally to members of Parliament and the public. At the same time, it serves as a reliable information data base of the Parliament, allowing parliamentarians and the public to retrieve information in an accurate and timely manner, thus promoting the principles of parliamentary transparency.

Milestones –Timescales

The steps and actions to be followed for achieving the commitment are as follows:

- Completion by December 2014:
 - Collaboration with Central Government Bodies (General Secretary of the Government, Ministries etc.) in order to review information flow from drafting of the bill to voting in Plenum and its subsequent transmission to the National Printing Office for publication
 - Exploration and joint adoption of an international open standard XML for syntax, structuring, processing and electronic transmission of bills and amendments
- Completion by June 2016:
 - Development of a system to handle structured legislative documents, track the document changes and produce different versions of digitally signed documents at each stage of the legislative process

4.2. ‘Parliamentary Transparency’ section of Parliament’s website

Commitment Text:

Enhancement and improvement of the functionality offered by the “Parliamentary Transparency” section of the Hellenic Parliament portal. Provision of open structured information.

Milestones –Timescales

- Completion by February 2015:
 - Evaluation of the current state of the section concerning visitor experience (e.g. by creating relevant questionnaire) regarding usability, accessibility and institutional level.
- Implementation (gradually) by June 2016:
 - Development of the “FAQ” section, for institutional and technological questions originating from visitor feedback.
 - Provision of the visitor information via RSS (Rich Site Summary) either by subject area or by type of decision.
 - Publication of statistical data.
 - Provision of structured information (based on open standards) for execution of the budget by the Parliament.

Editorial note: Commitments 4.1 and 4.2 have been clustered for the purpose of analysis in this report. They will be discussed jointly in the narrative below.

Furthermore, the several milestones that comprise commitment 4.2 have been grouped together into two milestones.

Responsible Institution: Hellenic Parliament

Supporting Institution(s): None

Start Date: July 2014

End Date: June 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
4.1. Overall				✓	✓	✓		✓		✓					✓	
4.1.1. Review legislative information flow			✓		✓	✓				✓						✓
4.1.2 XML standard for legislative documents				✓	✓			✓		✓				✓		
4.1.3. Legislative document handling system				✓	✓			✓		✓				✓		
4.2. Overall				✓	✓	✓		✓		✓				✓		
4.2.1. "Parliamentary Transparency" website visitor experience			✓		✓			✓		✓			✓			
4.2.2. Improvements to "Parliamentary Transparency" section				✓	✓	✓		✓		✓				✓		

What happened?

The main goal of commitments 4.1 and 4.2 is to adopt a system that would allow for a more streamlined monitoring of all actions undertaken during the processing of a parliamentary bill. It was designed to replace the numerous, mainly non-digital processes and flows that are now in operation. The current process of drafting and amending draft legislation texts is to a large extent a manual job. It does not allow for automated tracking of changes introduced in each processing stage or for the publication of electronic documents in machine-readable and reusable format.¹

Milestone 4.1.1 was completed on schedule. According to Parliamentary staff,² before the implementation of the second action plan, government officials had already started designing a system that would promote collaboration between relevant government agencies. Collaboration was intended to establish and record available information concerning the drafting and submission of bills to the Parliament. By December 2014, Parliament staff held a series of meetings with officials from the Informatics Development Service and the Ministry of Public Administration. The minutes of these meetings were not made publicly available. Additionally, the new system was tested through the review of an existing piece of legislation. However, the pilot examination was not public.

Regarding milestone 4.1.2 the adoption of an international open standard XLM, the Hellenic Parliament has started discussing options and currently favors adopting the technical standard Akoma Ntoso. Nevertheless, no decision has been made yet. Therefore, the IRM researchers found that this milestone had limited completion.

The IRM researchers found that milestone 4.1.3 has limited completion because only the initial design stage of the legislative document handling system has been implemented.

The IRM researchers found no evidence that milestone 4.2.1 has been started.

Regarding milestone 4.2.2, the improvement of the Transparency section of the website has been completed according to parliamentary staff and IRM researchers verified the operation of the relevant section.³ However, Parliamentarians are not required to track and publish decisions or changes made in documents, unless specifically mandated by the President of the Parliament. Therefore, the type, number, and timeliness of publishing parliamentary decisions on the system remain unclear.

At the time of writing (September 2015), Parliamentary staff has met with other stakeholders, but has not attempted to collaborate closely with relevant nongovernmental organizations, despite their expressed interest (e.g. Vouliwatch). The government is designing an evaluation questionnaire to assess the changes made so far. The drafting process is internal, with no outside consultation.

Did it matter?

The completion of the legislative document handling systems would allow significantly improved access to tabled legislation. If completed, it would allow for increased public participation during the introduction and voting of a bill, and it would enable parliamentarians and their staff to have quicker and more efficient access to changes and amendments. Adopting acknowledged standards would improve clarity, dissemination speed, and efficiency of access. Improvements to the transparency section of the website, especially when fully implemented, would significantly increase the transparency and accountability of the Hellenic Parliament's internal operations. The commitment text mentions that the public would be able to interact with the system, but does not clearly state to what extent.

Another value of these two commitments is in increasing cooperation between the various agencies involved and sharing information on an open basis between bodies that had little contact with each other up to this point. Strengthening the Transparency section of the Hellenic Parliament's website has benefited the public, to an extent. The provision about the percentage of total parliamentary decisions shared publicly remains unclear.

Moving forward

The IRM researchers suggest the Greek Government carry this commitment into the next action plan. They should amend the commitment to specify how the Hellenic Parliament should improve their website and to implement new technologies, namely by:

- Selecting an appropriate common framework or standard for legislation tracking to enable improved communication between stakeholders and to quicken final implementation of the system;
- Contacting and collaborating with nongovernment entities that have relevant experience (e.g. Vouliwatch, GFOSS, OKFN Greece, among others);
- Allowing public consultations to discuss legislative amendments;
- Legally requiring the Parliament to publish its legislative and internal decisions on its website;
- Integrating the parliamentary website section into the new interface of the Transparency Program known as Diavgeia;
- Including mechanisms in the language of future commitments to ensure citizens have total access to Diavgeia's system.

1 "Legislation Work," Hellenic Parliament, <http://bit.ly/10xnNx6>

2 Most of the information regarding these commitments is from parliamentary staff interviews, which were informal, upon staff request.

3 "Transparency," Hellenic Parliament, <http://diafaneia.hellenicparliament.gr>

4.3. Parliament website and new standards

Commitment Text:

Open Parliamentary Data is a major challenge for the Hellenic Parliament, following the example of parliaments worldwide. Moreover, proper structuring of information ensures user broader and more qualitative experience and pooling of all requested data sought for at specific points of the portal.

The specific commitment requires functionality improvement in the Hellenic Parliament portal, in line with new standards that meet the Open Public Data, content enrichment, application development for visual representation of information and development of search tools.

Milestones –Timescales

- Study by June 2015 for:
 - Setting up of a project team in order to evaluate parliamentary information flow and technological infrastructure. Determination of the information's exact nature and the parliamentary data implementation scope, redefinition of standards concerning the kind of information to be disclosed, where, when, and in what format.
 - Review of ways, means and time of information presentation.
 - Review of the terms of use of the Hellenic Parliament portal, in order to allow for content reuse.
- Implementation (gradually) by June 2016:
 - Further utilization of the general search tool provided through the web portal in order to enable advanced searches, using logical operators and selection of distinct information groups.
 - Content enrichment with data which may concern: dissemination of voting results through open standards, publication of MPs amendments, publication of first draft Minutes of Committee Meetings, additional data on MP's activity (votes, participation in Committee meetings, in parliamentary missions, abstracts of their interventions in the committees and the plenary etc.), additional data on parliamentary control means (protocol number, search by subject), advanced search criteria of the Plenary composition, publication of Independent Authorities reports, periodic publication of parliamentary control special procedures data, dynamic presentation of the Parliament organization chart etc.
 - Better visualization and linking of given information.
 - Presentation of existing data, information and documents in a variety of formats: creation of e-books, legislative documents and Minutes of the Plenary in html format further to pdf and word formats.
 - Web portal size and key features (menus, images, text) adjustment, depending on user's screen device dimensions (responsive web design).

4.4. Open historical parliamentary data

Commitment Text:

The commitment aims to enrich the Parliament web portal content with the publication-in accordance with open standards- of digitized material concerning:

- Plenary Session Minutes from the 1st Legislative period to the 8th Legislative period (9-12-1974 to 22-8-1996),
- Introductory reports of bills tabled from 1975 to 1993.

It also aims at the partial conversion of parliamentary archives into electronic books (e-books), making them available to the public through the web portal.

Milestones –Timescales

- Implementation (gradually) by June 2016:
 - Investigation and adoption of specialized optical character reading software (OCR) that will be able to accurately digitize printed historical material relating to Minutes of Plenary Sessions and to Bills introductory reports that was once written on a typewriter.
 - Systematic quality control in resulting digitized text files and application of necessary corrections.
 - Documentation of the digitized material and its progressive publication on the Hellenic Parliament portal.

Concerning e-books creation, the following actions will be implemented:

- Completion by October 2015:
 - Exploration and adoption of open standards for the creation and reading of electronic books and open source applications.
 - Pilot electronic book creation on different categories of parliamentary documents.
 - Finalization of e- books structuring by category of parliamentary documents.
- Implementation (gradually) by June 2016:
 - Activation of e- books creation and publication process for selected categories of parliamentary material.

Editorial note: Commitments 4.3 and 4.4 have been clustered for the purpose of analysis in this report.

They will be discussed jointly in the narrative below.

Furthermore, the several milestones that make up both of the commitments have been grouped together into two milestones for each of the commitments respectively.

Responsible Institution: Hellenic Parliament

Supporting Institution(s): None

Start Date: July 2014

End Date: June 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
4.3. Overall				✓	✓			✓			✓			✓		
4.3.1. Review study of Parliament website improvements				✓	Unclear						✓					✓
4.3.2. Parliament website improvements				✓	✓			✓			✓			✓		
4.4. Overall				✓	✓			✓		✓				✓		
4.4.1. Digitize public historical Parliament material				✓	✓			✓		✓				✓		
4.4.2. Standards and public access to Parliament e-books				✓	✓			✓		✓			✓			

What happened?

These two commitments aim to increase the amount of data made available to the public and to improve the functionality of the Parliament's existing online platforms. The Hellenic Parliament developed these commitments as part of their individual action plan (see Commitment Overview for more explanation). They are largely internally focused on streamlining parliamentary functions. These commitments have achieved overall limited progress. Milestone 4.3.1, the review study of the Parliament's website improvements, has been completed but the more substantive and relevant milestones lag behind in terms of completion.

Milestone 4.3.1, the review study of the Hellenic Parliament website has been completed. According to interviews with parliamentary staff, the government has formed a working group to improve the Hellenic Parliament website and to implement the new standards technologies. This group has carried out a comparative analysis of the methods and practices used by other nations' parliaments. Analysis was made available earlier than planned and was offered for public consultation¹. It is unclear if and to what extent the results of the public consultation process were included in this report.

Milestone 4.3.2 has limited completion. The Hellenic Parliament's website currently contains plenary session minutes from 1996 onward and introductory reports of bills from 1993 onwards published in PDF, .doc and .txt formats. Nevertheless, these documents are formatted mostly on an ad hoc basis because following international standards or using recognized software or schemes (e.g. legislative XML, Akoma Ntoso, etc.) has not been adopted yet.²

Some processes dealing with information published on the Parliament's website have been improved to increase transparency. For instance, parliamentary staff are allowed to fact-check the CVs of all members of parliament before they are published on the website. Until this point, all CV submissions were published without verification of the information. The Greek Parliament also has begun to provide a full set of minutes for all committee meetings.³

Most plenary sessions are made available live on a Parliament's TV channel. An additional web-only TV stream has been created to accommodate the transmission of additional sessions that may run concurrently and cannot be live on the TV channel. IRM researchers verified these developments. Additionally, the Hellenic Parliament is planning to provide a service that synchronizes video or audio recordings of sessions with the available transcribed minutes.

Milestone 4.4.1 had limited completion. The IRM researchers found that the existing digitized historical files suffer from low machine-readability, and search capabilities of available content categories is limited. Available information is presented in a way that requires the public to have significant knowledge of parliamentary process. Legislative materials and minutes make frequent references to past, existing, and active legislation, which are inaccessible by the public because a free, public repository of legislation is not available. Open standards for available information are not in general use. Reuse features such as APIs also are not available. Although the Parliament has started the scanning these documents and has made the material available on their website for downloading, they have not adopted optical character reading software (OCR strategies) yet.⁴

For milestone 4.4.2, the IRM researchers found no evidence that this milestone has been started.

In general, the Hellenic Parliament has not been able to increase the visibility of all material because personal data embedded within the cache of historical documents was discovered. This also is due to possible issues arising from a Greek Data Protection Agency decision that requires all legal text to be made anonymous before publication, which has led implementing agencies to err on the side of caution and not publish material until it has been made anonymous. Some of the scanned material has been made available on the relevant section of the Parliament's website.⁵

Did it matter?

These commitments are of modest ambition, aiming to provide additional levels of service on existing, operating web platforms. Nevertheless, they intend to bridge the gap between parliament and the general citizenship by boosting participation in the political process and by providing citizens with the power to influence legislation.

The completion of these website improvements would enhance access to Hellenic Parliament information for all stakeholders and would foster increased transparency.

Commitments dealing with the digitization of historic material, although adding to the overall amount of information offered by the government, are of lower impact because in many cases involve non-machine-readable formats and files.

Milestone 4.3.1 is an important stepping-stone to effectively improve parliamentary transparency; however, it has unclear relevance to OGP's values. This milestone does not require the Parliament to make this study public, to disclose government-held information, or to invite other stakeholders to participate in its elaboration. If the study were used for any of these purposes, then it would have clear relevance to OGP values.

Additionally, it must be noted that no publicly available data exists (e.g. Parliamentary TV channel viewing figures, website visit statistics) that could help measure the possible public impact of these initiatives. Moreover, nongovernmental organizations' participation has been minimal, both at the design and implementation stages of these services. Further, no relative feedback exists. Stakeholders interviewed noted that debates on plenary sessions already were televised, although committee meetings were added as a result of implementing this commitment. However, in many cases, these meetings are more interesting to subject matter experts who have expressed a preference for searchable text transcripts over televised meetings.

Moving forward

Overall, it is the opinion of the IRM researcher that the government must continue to promote the implementation of these milestones while addressing issues of data openness and accessibility. On such commitments, the Parliament could collaborate with organizations such as Open Knowledge Foundation Greece, which has relevant experience and expertise.

It is the opinion of the IRM research team that, in an effort to realign the implementation of these commitments with the set goals and timeline, the Hellenic Parliament should consider:

- Publishing the study evaluating parliamentary performance to promote citizen participation and to guarantee relevance of OGP values in commitment 4.3.1;
- Consulting with government groups (e.g. the Department of Justice) that have amassed significant experience in digitizing and dealing with large datasets that contain sensitive personal information; consulting and collaborating with relevant CSOs and communities (e.g. Wikipedians) that may have important insights in managing similar projects;
- Publishing user statistics for both their TV channel and website, providing a clear and easy means of user feedback for the offered services;
- Create a specific process for making legal texts anonymous to expedite the publication process.

1 "Final Report on Hellenic Parliament Improvement Methods and Link to Public Consultation," <http://bit.ly/1SqqAy0>

2 "Minutes, Plenary Sessions," Hellenic Parliament, <http://bit.ly/1R4mm05>

3 "Committee Meetings," Hellenic Parliament, <http://bit.ly/1RUXIEm>

4 "Scanned Collections," Hellenic Parliament, <http://bit.ly/1VurDN3>

5 Digital Library of the Hellenic Parliament, <http://bit.ly/1ky138v>

4.5. Parliament social media policy

Commitment Text:

Parliament Social Media communication policy enhancement and improvement of its already established social media account e- services are the Hellenic Parliament's major goals. Regular and organized citizens approach and access in terms of information, education and participation is a necessity calling for the Parliament's integrated communication design.

Milestones –Timescales

The commitment will be implemented internally with the collaboration of different Hellenic Parliament Directorates. If necessary, external bodies or stakeholders will be engaged for the provision of technical know-how and further training.

- **Completion by March 2015:**
 - Listing of gaps and needs for the enhancement of each social medium at communicative, administrative and technical level.
 - Results' presentation, decision on the communication policy goal and the information to be posted on social media, the use of social media widgets on specific points of the Hellenic Parliament website, as well as that of the Hellenic Parliament Foundation for Parliamentarism and Democracy, for enabling sharing of specific content.
 - Examination of choice between a Creative Commons or YouTube Standard License in compliance with Open Data general practices and Greek legislation, as well as with the EC Directive on the re-use of Public Sector Information (PSI).
- **Implementation (gradually) by June 2016:**
 - Establishment and training of content management teams, content uploading and communication with citizens.
 - Technical improvements, setting social media widgets, completion of content uploading/posting automation

4.6. Online provision of exhibitions

Commitment Text:

The library and the Hellenic Parliament Foundation for the Parliamentarianism and Democracy organize exhibitions aimed at the study and promotion of the concepts of democracy and parliamentarianism, the search for collective memory and collective identity formation.

Digital platform processing of exhibitions, adopting technologies for virtual visits to the natural exhibit sites, enabling open access to exhibitions via the internet and mobile devices promote citizens' awareness and understanding of parliamentary function.

The development of an interactive relationship between the Parliament and the citizens, through educational and cultural activities, encourage their involvement in Parliamentary affairs, while enhancing Parliament openness.

Milestones –Timescales

- **Completion by October 2015:**
 - Platform adoption for exhibition collections' digital viewing on the internet that will provide easy access to people with disabilities. Implementation should be based on international standards and protocols, open documented and published interface systems with third-party programs, open communication protocols and open environment for data transfer and exchange with other systems (National Documentation Centre, Europeana).
 - Development of applications for specialized services for exhibitions' virtual tour.
 - Development of applications for access to digital exhibitions from mobile phones and other popular mobile platforms.
- **Implementation (gradually) by June 2016:**
 - Selection of exhibition collections to be transferred to digital platform.
 - Examination of the possibility of documentation and presentation of exhibits in multiple languages.
 - Digitization of exhibits.
 - Identification of copyright for each element to be used in digital exhibition.
 - Virtual tour for selected exhibitions.
 - Gradual publishing of digital exhibitions online.

Editorial Note: Commitments 4.5 and 4.6 have been clustered for the purpose of analysis in this report. They will be discussed jointly in the narrative below. Furthermore, the several milestones that make up both of the commitments have been grouped together into two milestones for each of the commitments, respectively.

Responsible Institution: Hellenic Parliament

Supporting Institution(s): None

Start Date: July 2014

End Date: June 2016

Commitment overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
4.5. Overall				✓	✓	✓		✓			✓		✓			
4.5.1. Social media use goals and models				✓	Unclear					✓			✓			
4.5.2. Content management teams and content automation				✓	✓	✓		✓			✓		✓			
4.6. Overall				✓	✓			✓		✓			✓			
4.6.1. Adopt digital exhibitions platform				✓	✓			✓		✓			✓			
4.6.2. Digital exhibitions platform				✓	✓			✓	✓				✓			

What happened?

The Hellenic Parliament is trying to engage effectively with different audiences through the enhancement of its social media policy and the online provision of exhibitions. Currently, its social media efforts lack an overarching strategy. Their presence on Twitter¹ mainly reproduces the content generated by the Parliament's press office (official press releases and photographs). To a large extent, the Parliament's YouTube channel² is used to duplicate the content available at, or produced by, the Parliamentary TV channel,³ which are mainly plenary session recordings. Interaction with the public through social media accounts is minimal.

Milestone 4.5.1 addresses this issue by creating a unified strategy with overarching goals for social media use. The Parliament envisions this strategy as a means of increasing visibility of its actions and as a feedback mechanism for the public. They wish to use their social media accounts to provide daily reports on political issues. Due to the Parliament's limited human resources, officials have not been able to enhance the current social media policy properly. Government representatives have reported that the Hellenic Parliament staff carried out an internal review of current practices that includes possible future social media use scenarios, nevertheless since texts of the review has not been made available to the public, the IRM researchers believe this commitment has not started yet.

Milestone 4.5.2 follows the creation of the strategic goals with the formation of the teams necessary for citizen engagement through social media. At the same time, it aims to automate some of the content provision. Implementation on this commitment has not started yet.

Milestone 4.6.1 on the adoption of digital exhibitions platform and milestone 4.6.2 on the transfer of collections to digital exhibitions platform respond to the Hellenic Parliament's need to engage further with the public and to create awareness of their mandate. At present, there are no permanent means of offering web-accessible versions of its exhibitions. In some cases, ad hoc versions are produced. No efforts aiming to secure funding or to provide an online display of Parliament's exhibitions have come to fruition.

As it stands implementation on the two digital exhibitions commitments has not started yet, as a result of the unavailability of the required funding.

Did it matter?

This commitment aims to improve the Hellenic Parliament's social media engagement strategy. If fully implemented, it would allow members of civil society and the public to interact directly with the Hellenic Parliament in a more transparent and meaningful way. These improved strategies also could offer an additional pathway for public participation during legislative consultation periods. Similarly, the online sharing of exhibitions would allow members of the public to engage on less political aspects of the Parliament's work and to gain familiarity with its role and operations. However, due to the Parliament's limited human resources, officials have not been able to properly enhance the current social media policy.

Moving forward

In an effort to realign the implementation of these commitments with the set goals and timeline, the IRM research team recommends the Hellenic Parliament consider:

- Consulting and collaborating with relevant CSOs and communities (e.g. Wikipedia's, OKFN Greece) that may have important insights in managing similar projects;
- Examining if an open source software-based solution coupled with crowdsourced input would allow for the online provision of exhibitions commitment to move forward, addressing some of the funding issues.

1 "@pressParliament [Hellenic Parliament account]," Twitter, <https://twitter.com/pressParliament>

2 "Hellenic Parliament TV [Hellenic Parliament account]," YouTube, <http://bit.ly/1CCjRE>

3 "Web TV Service," Hellenic Parliament, <http://bit.ly/1TtU24B>

V. Process: Self-assessment

The government did not publish a self-assessment report by 1 October 2015. The report was expected to be made available for public comment by mid-October 2015.

Self-assessment checklist

Was the annual progress report published?	No
Was it done according to schedule?	N/A
Is the report available in the administrative language(s)?	N/A
Is the report available in English?	N/A
Did the government provide a two-week public comment period on draft self-assessment reports?	N/A
Were any public comments received?	N/A
Is the report deposited in the OGP portal?	N/A
Did the self-assessment report include review of consultation efforts during action plan development?	N/A
Did the self-assessment report include review of consultation efforts during action plan implementation?	N/A
Did the self-assessment report include a description of the public comment period during the development of the self-assessment?	N/A
Did the report cover all of the commitments?	N/A
Did it assess completion of each commitment according to the timeline and milestones in the action plan?	N/A
Did the report respond to the IRM key recommendations (2015+ only)?	N/A

Summary of additional information

The self-assessment report was not published by 1 October 2015. According to the Ministry of Interior and Administrative Reconstruction, it was still being undertaken at the time of writing and would be available for a weeklong public consultation period by mid-October 2015.

VI. Country context

This report covers one of the most tumultuous periods in modern Greek history. The continued struggle to recover from the global economic crisis of 2008 shaped the development of this action plan and impacted its implementation. OGP represents an opportunity to address deep-seated issues of corruption and rebuild trust, provided the government and stakeholders are able to fully engage in the process.

Greece has been struggling to recover from the global economic crisis of 2008, after having reported the worst government deficit in Europe and been unable to repay loans contracted in the past years since becoming part of the Eurozone. As of 2010, the Greek Parliament has voted three Memorandums of Understanding known as bailout agreements. However, lenders attached harsh conditions, including austerity measures as well as substantial tax increases. The social effects of this crisis have been pervasive, further contributing to what Transparency International identified as the perpetuation of a crisis of values.¹ In the past three years, although Greece improved its score in Transparency International's Corruption Perception Index from 36 (2012) to 43 in (2014), the country continues to be ranked last in the list of European Union and Western Europe Countries along with Bulgaria, Italy, and Romania.²

Due to the economic nature of the crisis, the Greek Government has been focused primarily on reaching financial stability. It has been participating in ongoing negotiations with the European Union and the International Monetary Fund to tackle the issue of the Greek international debt. This has led Greece to be in a state of inertia that has had profound effects on government efficiency. Because international negotiations have become the priority, there is a legal and executive slow down and decision making on internal reforms generally has been postponed. As a result, during the implementation period of the second action plan (1 July 2014 to 31 July 2015) the Government of Greece has not been able to engage fully in discussions regarding the adoption and implementation of open government policy or to engage fully in OGP activities. The most prominent political event that occupied the government's agenda during this period was the bailout referendum of July 2015 on whether the Greek Government should accept the debt bailout conditions proposed by international lenders.

The few initiatives that have been set on the table to tackle corruption and foster transparency have been ambivalent. For example, the new Syriza government created the position of Anticorruption Minister in February 2015,³ only for it to be abolished seven months later.⁴ The responsibilities of the abolished office were subsumed by the Justice Ministry, which announced an ambitious three-year, multi-pronged plan (47 goals and 123 actions)⁵ for fighting corruption. This framework includes upgrading the role of auditing authorities and merging of authorities to accomplish better coordination; adopting international auditing standards, applying electronic auditing systems; the total reform of the system for public contracts and especially for the public health contracts; fighting illegal trade of fuel, cigarettes, and alcohol; and, a new law for political money.⁶ However, at the same time, the country's lenders were requesting that such responsibilities be passed onto a new independent authority.⁷

In a similar vein, a new Code of Conduct was proposed for members of Parliament, to be enacted by March 2016.⁸ However, publication of members of Parliaments' personal financial statements since 2012 is still pending.⁹

Amendments that underpin the flagship transparency Clarity/Diavgeia project were introduced to the legal framework.¹⁰ These amendments affected Clarity's core by introducing exceptions to its basic principle, that no decision with financial impact can be executed if the relevant documents have not been published beforehand in the Clarity/Diavgeia website. These developments prompted the President of GFOSS, Diomidis Spinellis, to state that this development "sets an extremely negative precedent that undermines the importance and function of Clarity as a central tool for ensuring

transparency in the functioning of the public administration, notably in the sensitive issue of public spending.”¹¹

Despite this track record of ambivalent initiatives, a few activities have been planned successfully at the local level. For example, the West Macedonia Region developed a strategic plan to design and implement reforms at multiple levels. Using methods of open and e- government, it will be carried out between 2015 and 2019. Its goal is to pursue open government and e-government reforms that eventually will improve public perception of the region as a vibrant place for all different actors who interact directly or indirectly (i.e. employees, citizens, visitors, and tourists). Pilot projects being designed for implementing the plan’s objectives include open e-deliberation, accessible and accountable region policies, innovation from—and for—the people, participatory budgeting, and an e-ombudsman. The pilot projects will be monitored via periodical reviews that aim to establish a culture of constant optimization and improvement. They will take into account the results of the interaction with the wider community of stakeholders regarding issues of open government reforms.

Among other positive initiatives are the changes the Alternate Minister of Interior and Administrative Reconstruction, Mr. Vernardakis, is introducing. These include the creation of a comprehensive public employee registry from which public agencies will draw candidates for directorial and upper managerial positions. The Supreme Council for Civil Personnel Selection (ASEP), an independent authority established in 1994, will oversee selection procedures. Similarly, a new framework for the appraisal of public sector employees will be enacted into law. It will introduce more stringent criteria for advancement as well as public interviews during the selection process. Public sector performance feedback mechanisms will, for the first time, give citizens a direct say in the process.

In conclusion, Nikos Passas, a Professor of Criminology and Criminal Justice at Northeastern University, remarks that the widespread corruption phenomenon in Greece responds to an overgrown administration (e.g. overregulation, inefficiency, clientelism, and rent-seeking), oligarchic networks of influence (e.g. banking, sports, media, and political finance), and widespread attitudes of tolerance. Open government issues have had less visibility, discussion, and resources for local and targeted initiatives. But, as Professor Passas argues, this crisis might represent a unique opportunity for Greece to start from scratch.¹² The government is struggling to keep the country’s economy afloat, and the connection that officials have yet to make is that committing to OGP values and its core principles could play a crucial role in Greece’s recovery from the current issues the country faces.

Stakeholder priorities

This report coincides with a new round of national elections that push the agenda of open government, practically out of public discussion. GFOSS, the leading association of OGP stakeholders in Greece, tried to reposition the open government during the election by publicizing a list of stakeholder priorities that, for the most part, derive from the current OGP action plan. This list included recommendations, which are detailed in the commitments section of this report, and are organized around the following:

- Implement existing laws on deliberative governance, open data, and transparency.
- Strengthen parliamentary and institutional transparency.
- Introduce a citizen monitoring system for government practices.
- Connect open government and open technologies issues with the national education system.

Stakeholder priorities for the next action plan consist of an open process related to the Greek OGP forum (under incubation). They include two sets of priorities: (1) defining proposals and actions on the next national action plan, and (2) developing the Greek OGP forum with specific, set rules of conduct. Neither item has been advanced significantly for the moment. We should acknowledge the shaping of a vibrant, bottom-up, open data community that will be presented further during our final evaluation report.

Scope of action plan in relation to national context

Greece has suffered from an unclear and continuously changing anticorruption strategy, and the government still has not been able to integrate OGP into its existing transparency plan. Overall, the second action plan has a broader scope than the first one because it includes commitments aimed towards reforming the Hellenic Parliament and encourages the release of specific government-held data for the first time. Nevertheless, it does not integrate the action plan and the OGP process in critical policy areas related to the justice, health, education, or the labor system. This lack of integration has been a significant obstacle in the completion of the current commitments.

At this point of the IRM evaluation process (September 2015), the OGP Greek action plan continues to have low penetration in terms of policy value and implementation. In a country where the phrase “government reform” has become a supposed panacea for the sustainability of its debt, there is an opportunity for OGP to operate as a transition framework for reform deliberation, consensus formation, design, and deployment. However, in practice, OGP has been isolated from wider efforts for change and governance process reengineering. As a result, both the OGP process and governance reform in Greece have suffered. We strongly propose the following:

1. Deliberation of the OGP action plan and perspective in the Greek Parliament through formal and informal working sessions.
2. Ownership and coordination of the OGP action plan at the highest political level.
3. Creation of an OGP-based framework for collective and collaborative reform deliberation, design and deployment.

These elements set the basis for Section VII on general recommendations. They aim to complete the results of existing, related, government OGP-promotion initiatives, notably the Open Public Data Hackathon. This event took place in May 2014. It brought together and supported various national open data actors, the government, and civil society (more info available in Greek at www.ydmed.gov.gr/?p=8291).

1 “Greece: The Cost of a Bribe,” Surveys, Transparency International, 3 April 2012, <http://bit.ly/1ky0Np0>

2 “Transparency International Corruption Perceptions Index 2014: Results,” Transparency International, 2014, <http://bit.ly/1QfofpE>

3 Stephen Grey, “Greek Gov’t Vows to Tackle Domestic Corruption,” Business, Ekathimerini, 17 February 2015, <http://bit.ly/1mufeg6>

4 “Questions for the of Non Reappointment of the Anticorruption Minister,” Huffington post, 23 September 2015, [Greek] <http://huff.to/1PBt4H9>

5 “Programmatic Declaration of the Deputy Minister of Justice,” 7 July 2015, <http://bit.ly/10xojv7>

6 The report of the announcement of the national plan against corruption was made public in the Greek press. “National Plan against Corruption Announced by D. Papangelopoulos,” Naftemporiki, 7 October 2015, <http://bit.ly/10xoiax>

7 “The Changes the Troika Is Demanding on Dealing with Corruption,” Real News Newspaper, 9 August 2015, [Greek] <http://bit.ly/1UklQsn>

8 “Detached House in Phenomena of Corruption and Financial Crime,” Ekathimerini, 30 September 2015, [Greek] <http://bit.ly/1mUPcD4>

9 George S. Bourdaras, “Occupying Commission: Further Testing for Flabourari and Stathaki,” Ekathimerini, 24 October 2015, <http://bit.ly/1OnM6E>

10 “Policy,” Ethnos.gr, <http://bit.ly/1ML1iU7>

11 Greek Free / Open Source Software Society (GFOSS) Editor, “Letter Asking for the Withdrawal of the Amendments Affecting Clarity,” GFOSS, 4 May 2015, [Greek] <http://bit.ly/1IISbbV>

12 Nikos Passas, “Fighting Corruption,” TEDxAcademy, 16 October 2015, <http://bit.ly/1jVWyV5>

VII. General recommendations

Crosscutting recommendations

This section organizes recommendations for improvements to the OGP process in Greece under three policy themes in the country's context.

The major ensuing challenge identified in this progress report is significantly upgrading the position of OGP in the public agenda to ensure commitment implementation and development of relevant, transformative commitments in future action plans. The IRM researchers believe this can be accomplished by ensuring that implementation of open government policies, in general, and OGP commitments, in particular, are the responsibility of a high-level administrative authority. Other challenges concern the systematic and methodic cultivation of an open governance culture within the Greek Government as well as across civil society.

OGP administrative authority

Appoint a relevant authority for the overall coordination of the OGP action plan. It should be an independent role, following the model of the State Secretary for Public Revenue. Alternatively, the framework for this authority could be enforced as a permanent unit answerable to the Prime Minister's office.

Designate responsible national contact points at the agency director level for each commitment to increase ownership over the OGP action plan. These contact points could have enhanced responsibilities and roles in public OGP agenda setting.

OGP consultation actions

Make Greece's participation in the OGP process the center of a wider cross-party discussion concerning open government reforms and how specific OGP commitments can support these reforms. The IRM researchers recommend the government begin this discussion by organizing informational events to engage political parties. The IRM researchers also recommend these discussions involve Parliamentary proceedings at both plenary and working group sessions, as well as other horizontal institutional entities (i.e. regional and local government bodies). This would establish a legal mandate for consultation with civil society during the development of open government reforms.

In the next action plan, commitments should have a direct impact on citizens, civil society, and government efforts to alleviate specific problems caused by the Greek financial crisis. The IRM researchers recommend that commitments on open data, participation, and access to information address these issues with concrete actions such as the development of public services and online applications.

The IRM researchers recommend installing mechanisms that provide more autonomy to public administration agents in implementing local administration initiatives. The IRM researchers also recommend supporting ongoing collaborative efforts to promote open process design and connecting them with wider reform efforts.

To increase awareness and use of the OGP process, the IRM researchers recommend framing OGP as a platform that includes private sector activities and involves corporate transparency, particularly, on finance, the media sector and labor practices.

Specific policy areas that should be addressed in the next action plan include the following:

- Ensure that dissemination and electronic application development strategies for opening new public datasets include viable legal frameworks.
- Include commitments that apply open government solutions to the existing anticorruption strategy.
- Engage the Judiciary in the OGP process. The Ministry of Justice is currently responsible for implementing anticorruption strategies; therefore, the next action plan should consult with

the Ministry to ensure that open justice initiatives are viable and supported. The next action plan should include a commitment that addresses the issues of openness in the Judiciary.

- Due to the impact of the health and pension systems on the Greek financial crisis, a commitment should address bribery for special treatment in hospitals known as “Fakelaki.”
- The large number of undeclared workers in the workforce continues to be an issue that should be addressed in the next action plan.

TOP FIVE ‘SMART’ RECOMMENDATIONS
1. Improve ownership of the OGP action plan by appointing a relevant authority with increased enforcement powers for the overall coordination of the OGP action plan. It should be an independent role, following the model of the State Secretary for Public Revenue.
2. To ensure meaningful stakeholder participation in the development and implementation of the action plan, the government should coordinate with the Parliament to initiate a legal mandate for open government and a permanent dialogue mechanism for public consultation.
3. Support ongoing efforts to connect the release of datasets with specific reform efforts in critical policy areas.
4. Commitments should be written in such a way that they clearly elaborate <i>which</i> policy targets they are intended to achieve and <i>how</i> these activities will lead to reforms in the policy area.
5. The scope of the action plan should include other policy areas that would benefit from more openness and open government solutions such as healthcare, the pension system, and undeclared workers.

VIII. Methodology and sources

As a complement to the government's self-assessment report, well-respected governance researchers, preferably from each OGP participating country, write an independent IRM assessment report.

Experts use a common OGP independent report questionnaire and guidelines,¹ based on a combination of interviews with local OGP stakeholders as well as desk-based analysis. This report is shared with a small International Expert Panel (appointed by the OGP Steering Committee) for peer review to ensure that the highest standards of research and due diligence have been applied.

Analysis of progress on OGP action plans is a combination of interviews, desk research, and feedback from nongovernmental stakeholder meetings. The IRM report builds on the findings of the government's self-assessment report and any other assessments of progress from civil society, the private sector, or international organizations.

Each local researcher carries out stakeholder meetings to ensure an accurate portrayal of events. Given budgetary and calendar constraints, the IRM cannot consult all interested or affected parties. Consequently, the IRM strives for methodological transparency, and therefore where possible, makes public the process of stakeholder engagement in research (detailed later in this section). In national contexts where anonymity of informants—governmental or nongovernmental—is required, the IRM reserves the ability to protect the anonymity of informants. Additionally, because of the necessary limitations of the method, the IRM strongly encourages commentary on public drafts of each national document.

Interviews and focus groups

Each national researcher will carry out at least one public information-gathering event. Care should be taken in inviting stakeholders outside of the “usual suspects” list of invitees already participating in existing processes. Supplementary means may be needed to gather the inputs of stakeholders in a more meaningful way (e.g. online surveys, written responses, follow-up interviews). Additionally, researchers perform specific interviews with responsible agencies when the commitments require more information than provided in the self-assessment or accessible online.

On December 2014, in cooperation with the IRM research team, the Greek Government issued an open call for anyone interested in joining the permanent cooperation committee (framed as a civil society and government agencies' forum) for the participation in OGP. The call was published in www.opengov.gr, and interested parties had the opportunity to submit their application to join the forum online. According to the call, the forum has the following four objectives: first, to cooperate for the implementation of the national action plan; second, to present the progress of implemented actions; third, to develop new proposals for consideration in future action plans; and, fourth, to transfer know how and exchange experiences.

This call led to a first meeting of the OGP committee (the OGP Forum) in January 2015. It took place on the premises of InnovAthens in Athens and had a twofold purpose. First, it was a public OGP information event. The IRM research team publicly presented information about the OGP's mission, values, and procedures. Second, it gathered opinions on the possible legal form to be adopted by the forum, next steps, and priorities.

Results of this process are available in Greek at <http://goo.gl/HN2cZI>.

This meeting was preceded by an IRM organized focus group in December 2014. The IRM researchers invited a list of 29 civil society actors and the OGP government team to discuss OGP commitments and how civil society would contribute to them.

An overview of results in English is available at www.mindmeister.com/484875030.

A full list with the interviews and the meetings is as follows:

- Working meeting with the National Contact Point for OGP, Nancy Routzouni (July 2014)

- Working meeting with the National Representative for OGP, Vice Minister Evi Christofilopoulou (September 2014)
- Working meeting with the National Representative for OGP, Vice Minister Evi Christofilopoulou and the National Contact Point for OGP, Nancy Routzouni (November 2014)
- Focus working group with stakeholders from the public and civil society sectors held at the premises of InnovAthens (December 2014)
- Information event for OGP and gathering of stakeholders primary views on open government, held at the premises of InnovAthens (January 2015)
- Participation at a closed joint working session on parliamentary transparency issues organized by civil society organizations like Vouliwatch and GFOSS (April 2015)
- Working meeting with the National Contact Point for OGP, Nancy Routzouni (May 2015)
- Working meeting with the Deputy Minister of the Interior and Administration Reconstruction Mr. George Katrougalos
- Interview meeting with the member of OGP working group Nicoleta Charalambopoulou (June 2015)
- Email interview with the expert in the domain of open data from the Open Data Institute Michalis Vafopoulos (July 2015)
- Interview meeting with Anastasia Papastilianou, responsible for the operation of opengov.gr in the National Center for Public Administration (July 2015)
- Informal interview meeting with the IT Department of the Hellenic Parliament (July 2015)
- Email interview with the expert in the domain of open geospatial data from the Athena Research Institute and the geodata.gov.gr portal, Spyros Athanasiou (September 2015)
- Interview meeting with stakeholders within the Ministry of Finance (September 2015)
- Email interview with Theodoros Karounos, GFOSS Vice President. (September 2015)
- Working meeting with the National Contact Point for OGP Nancy Routzouni and the member of OGP working group Nicoleta Charalambopoulou (September 2015)

Document library

The IRM uses publicly accessible online libraries as a repository for the information gathered throughout the course of the research process. All original documents, as well as several documents cited within this report, are available for viewing and comments in the IRM Online Library in Greece (goo.gl/w4mFfg) or at publicly available repositories and websites as sited in the text.

Survey-based data (optional)

An online survey regarding OGP in Greece is currently running. The goal of the survey is to gauge the awareness, engagement, expectations, experiences, priorities, and proposals on Greece's participation in OGP. The link to the survey is available here (in Greek): <http://goo.gl/1sFTNJ>

About the Independent Reporting Mechanism

The IRM is a key means by which government, civil society, and the private sector can track government development and implementation of OGP action plans on a bi-annual basis. The design of research and quality control of such reports is carried out by the International Experts' Panel, comprised of experts in transparency, participation, accountability, and social science research methods.

The current membership of the International Experts' Panel is:

- Anuradha Joshi
- Debbie Budlender
- Ernesto Velasco-Sánchez
- Gerardo Munck
- Hazel Feigenblatt
- Hille Hinsberg
- Jonathan Fox

- Liliane Corrêa de Oliveira Klaus
- Rosemary McGee
- Yamini Aiyar

A small staff based in Washington, D.C. shepherds reports through the IRM process in close coordination with the IRM researchers. Questions and comments about this report can be directed to the staff at irm@opengovpartnership.org.

¹ Full research guidance can be found in the IRM Procedures Manual, available at <http://www.opengovpartnership.org/about/about-irm>.

IX. Eligibility requirements annex: Greece

In September 2012, OGP decided to begin strongly encouraging participating governments to adopt ambitious commitments in relation to their performance in the OGP eligibility criteria.

The OGP Support Unit collates eligibility criteria on an annual basis. These scores are presented below.¹ When appropriate, the IRM reports will discuss the context surrounding progress or regress on specific criteria in the Country Context section.

Eligibility Requirements: To participate in OGP, governments must demonstrate commitment to open government by meeting minimum criteria on key dimensions of open government. Third-party indicators are used to determine country progress on each of the dimensions. For more information, visit: http://www.opengovpartnership.org/how-it-works/eligibility-criteria .				
	2012	Current	Change	Explanation
Budget Transparency ²	Not Assessed	Not Assessed	No change	4 = Executive's Budget Proposal and Audit Report published 2 = One of two published 0 = Neither published
Access to Information ³	4	4	No change	4 = Access to information (ATI) law in force 3 = Constitutional ATI provision 1 = Draft ATI law 0 = No ATI law
Asset Declaration ⁴	4	4	No change	4 = Asset disclosure law, data public 2 = Asset disclosure law, no public data 0 = No law
Civic Engagement (<i>EIU</i> Citizen Engagement Score, raw score)	4 (9.41) ⁵	4 (9.41) ⁶	No change	1 > 0 2 > 2.5 3 > 5 4 > 7.5
Total / Possible (Percentage)	12 / 12 (94%)	12 / 12 (100%)	No change	75% of possible points to be eligible

¹ For more information, see <http://www.opengovpartnership.org/how-it-works/eligibility-criteria>.

² For more information, see Table 1 in <http://internationalbudget.org/what-we-do/open-budget-survey/>. For up-to-date assessments, see <http://www.obstracker.org/>.

³ The two databases used are Constitutional Provisions at <http://www.right2info.org/constitutional-protections> and Laws and draft laws <http://www.right2info.org/access-to-information-laws>

⁴ Simeon Djankov, Rafael La Porta, Florencio Lopez-de-Silanes, and Andrei Shleifer, "Disclosure by Politicians," (Tuck School of Business Working Paper 2009-60, 2009): [://bit.ly/19nDEfK](http://bit.ly/19nDEfK); Organization for Economic Cooperation and Development (OECD), "Types of Information Decision Makers Are Required to Formally Disclose, and Level Of Transparency," *Government at a Glance 2009*, (OECD, 2009): [://bit.ly/13vGtqS](http://bit.ly/13vGtqS); Ricard Messick, "Income and Asset Disclosure by World Bank Client Countries" (Washington, DC: World Bank, 2009): [://bit.ly/1c1okyf](http://bit.ly/1c1okyf); For more recent information, see <http://publicofficialsfinancialdisclosure.worldbank.org>. In 2014, the OGP Steering Committee approved a change in the asset disclosure measurement. The existence of a law and *de facto* public access to the disclosed information replaced the old measures of disclosure by politicians and disclosure of high-level officials. For additional information, see the guidance note on 2014 OGP Eligibility Requirements at <http://bit.ly/1EjU4Y>.

⁵ Economist Intelligence Unit, "Democracy Index 2010: Democracy in Retreat" (London: Economist, 2010). Available at: [://bit.ly/eLC1rE](http://bit.ly/eLC1rE).

⁶ Economist Intelligence Unit, "Democracy Index 2014: Democracy and its Discontents" (London: Economist, 2014). Available at: <http://bit.ly/18kEzCt>.