

Independent Reporting Mechanism (IRM): Greece Design Report 2019–2021

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Executive Summary: Greece

Greece's fourth action plan focuses only on publishing open datasets from a variety of government ministries and agencies. The development of the action plan, which coincided with the challenging pre-election environment, provided limited opportunities for civil society and public engagement and as such, Greece acted contrary to the OGP process. The next action plan would benefit from a more collaborative process and a plan which addresses public procurement transparency, whistleblower protection, and a coherent

The Open Government Partnership (OGP) is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. The Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Greece joined OGP in 2011. Since, Greece has implemented three action plans. This report evaluates the design of Greece's fourth action plan.

General overview of action plan

The development of the fourth action plan took place during the politically challenging first months of 2019, a period which culminated in early general elections and subsequent change of government after the action plan was adopted. The Ministry of Administrative Reconstruction (MAR) led the OGP process for the development of the fourth action plan, although responsibility moved to the Ministry of Digital Governance after the July 2019 general election.

The action plan development process provided limited opportunities for civil society and public engagement, particularly compared to the previous development process for the third action plan. The process lacked a multistakeholder forum despite being an IRM recommendation, meaningful opportunities for the public and civil society to propose or shape commitments, or ongoing dialogue between government and civil society. Greece's process to develop the action plan was coded as 'consult', and therefore the country acted contrary to the OGP process.

The absence of meaningful multistakeholder consultation is reflected in the commitments which do not reflect priorities other than publishing open data. The action plan promises to publish government-owned datasets in various sectors, including education, agriculture, defense and

Table 1. At a glance

Participating since:	2011
Action plan under review:	Fourth
Report type:	Design
Number of commitments:	11

Action plan development

Is there a multistakeholder forum:	no
Level of public influence:	Consult
Acted contrary to OGP process:	yes

Action plan design

Commitments relevant to OGP values:	11 (100%)
Transformative commitments:	0 (0%)
Potentially starred commitments:	0



environment. However, in contrast to the previous plans, it falls short of proposing other measures and does not address broader challenges ensuring transparency and public engagement in decision-making. It also did not incorporate recommendations from the previous IRM report, to improve the commitments by ensuring they are problem-oriented and focusing on improving citizens' lives.

The next action plan could therefore introduce commitments in areas that have been identified to be a priority by the civil society. These include public procurement transparency (particularly in relation to COVID-19 emergency procurements), whistleblower protection, and developing a national open data strategy in collaboration with civil society, business and citizens.

Table 2. Noteworthy commitments

Commitment description	Moving forward	Status at the end of implementation cycle
<p>Commitment 2. Open access to data of the Ministry of Rural Development and Food Publish a variety of open datasets held by the ministry</p>	<p>When implementing this commitment, the ministry could raise awareness among potential users of the datasets made available, as well as provide opportunities for the public to identify high-value datasets to be published.</p>	<p>Note: this will be assessed at the end of the action plan cycle.</p>
<p>Commitment 3. Open access to data of the Ministry of Immigration Policy Publish a variety of open datasets held by the ministry</p>	<p>The ministry of Immigration Policy could engage with migrant groups, and local, national and international organisations working on the ground. This could help ensure that the information published by the ministry have an impact on implementation of policy, and/or the care of migrants and asylum seekers arriving in Greece.</p>	<p>Note: this will be assessed at the end of the action plan cycle.</p>

Recommendations

IRM recommendations aim to inform the development of the next action plan and guide implementation of the current action plan. Please refer to Section V: General Recommendations for more details on each of the below recommendations.

Table 3. Five KEY IRM Recommendations

Adhere to the OGP's Participation and Co-creation standards when co-creating action plans.
Establish a permanent and fully functional multi-stakeholder forum that ensures and oversees the co-creation process as well as provide effective monitoring during implementation.
Develop a national open public data strategy in a collaborative manner with non-governmental stakeholders that consolidates scattered data, ensures compliance with open data standards and quality, and prioritises publishing high-value datasets to address key economic, social, and political problems in Greece.
In a participatory manner, develop a commitment that enhances effective whistleblower protection in both the public and private sectors.
Enhance public procurement transparency, in particular by prioritising publishing information on procurements made through Ministerial or joint Ministerial Decisions, or other procurements related to the Covid-19 pandemic.

ABOUT THE IRM

OGP's Independent Reporting Mechanism (IRM) assesses the development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.

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I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area. OGP's Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments complete commitments. Civil society and government leaders use these evaluations to reflect on their own progress and determine if actions have impacted people's lives.

Greece joined OGP in 2011. This report covers the development and design of Greece's fourth action plan for 2019–2021.

The Independent Reporting Mechanism of OGP has partnered with Dr Dimitris Gouscos (lead researcher), Dr Evika Karamagioli (co-researcher), Dr Eleni Reveka Staiou and Dr Ira Iliana Papadopoulou (research team members), Laboratory of New Technologies in Communication, Education and the Mass Media, Department of Communication and Media Studies, National, and Kapodistrian University of Athens to conduct this evaluation. The IRM aims to inform ongoing dialogue around development and implementation of future commitments. For a full description of the IRM's methodology, please visit <https://www.opengovpartnership.org/about/independent-reporting-mechanism>.

II. Open Government Context in Greece

The government debt crisis following the 2008 global financial crisis and conditions of the third international financial bailout program that started in 2015 still shape Greece's reform agenda. Anticorruption measures, particularly around bribery, have been introduced in recent years. New constitutional amendments have introduced petition mechanisms to parliament and progress has been made on publishing more government information in open data. The current action plan includes commitments on publishing more datasets but falls short of addressing broader challenges ensuring transparency and implementation of effective accountability measures.

Background

Since exiting its third and final financial bailout program in August 2018, political debates in Greece have remained focused on the economic recovery and fiscal reforms. The development of the fourth action plan has taken place during the politically challenging first months of 2019, a period which has culminated in early general elections and subsequent change of government.

In January 2019, the Greek Parliament ratified the Prespes Agreement, reached on 12 June 2018 between Athens and Skopje, on renaming Greece's neighbour as the Republic of North Macedonia, resolving the long-running name dispute between the two countries. The majority of Greek citizens were opposed to the agreement,¹ forcing Prime Minister Alexis Tsipras to bring earlier-than-scheduled parliamentary elections for 7 July 2019.

Transparency and access to information

Access to information is a constitutionally guaranteed right in Greece, with the dedicated legislation on Freedom of Information passed in 1986. Greece ranks 65/150 on the RTI Rating, placing it in the lower half of European countries.² The law is limited in scope (applying only to the administration), allows for a number of exemptions and contains no clear sanctions for non-compliance. Greece has harmonised with European Union regulations, issuing a number of legislative and regulatory decisions on reuse of public sector information and on the mandatory publication of legislative and regulatory documents produced by national and local government and public sector bodies via the 'Diavgeia' web portal.

The Diavgeia project remains a flagship transparency initiative that has established mandatory open access publication of public decisions as a prerequisite to their entry into force. The data.gov.gr national open public data portal, and Law 4305/2014, which dictates the adoption of open access to public information by default, are considered together with Diavgeia cornerstones of Greece's transparency endeavour.

Efforts have been made to open up more government data. However, there have been no clear signs of expansion for re-use of open public data available on the Diavgeia and data.gov.gr open public data portals.³ The current action plan to a certain extent seeks to address this issue by requiring ministries to make data release decisions and publish datasets held by those institutions.

According to the OECD Our Data Index,⁴ Greece's performance has improved in terms of data accessibility, availability and government support for re-use from 0.37 in 2017 to 0.70 in 2019. These improvements have led Greece to rise from performing below the OECD average (0.44 in 2017) into one of the top performers in 2019 (the OECD average was 0.52 in 2019).⁵

Public sector users can today publish their datasets on the data.gov.gr open data portal.

Civil Liberties and Civic Space

Greece is amongst several major Western nations classified as 'flawed' democracies in the latest Economist Intelligence Unit Democracy Index, particularly when it comes to the functioning of government.⁶ The country scores 7.3/10 on civic rights, at the same levels as most Western Europe countries, guaranteeing opportunities for democratic participation and respect for the rule of law and civil rights. According to Freedom House, in 2019, Greece scored 51/60 on civil liberties.⁷

In an effort to enhance pluralism and freedom of religion according to the international and European standards, the Greek Ministry of Education and Religious Affairs has announced that school records and diplomas are no longer going to include religious affiliation or citizenship status information for students.⁸

The 2019 Greek data protection law (4624/2019)⁹ has been criticised for the limitations on data subjects' rights and for introducing wide and vague exceptions¹⁰ from data protection rules. For example, private entities are allowed to process personal data for preventing threats against national or public security upon request of a public entity. At the same time, data controllers do not have to erase data upon erasure request of a data subject, in case the controller has reason to believe that erasure would adversely affect legitimate interests of the data subject.

The country is ranked 65/180 in the 2020 World Press Freedom Index,¹¹ climbing 9 places since 2018. In February 2019, the Ministry of Justice introduced a bill to decriminalise defamation in the press.

Greek legislation foresees mechanisms for citizen participation. Law drafts are required to undergo an online public consultation process on the OpenGov.gr platform prior to being passed on to the Hellenic Parliament for discussion. Moreover, the recent amendments to the Constitution (Article 73¹² of the Greek Constitution) introduced in late 2019 establishes the notion of a civic legislative initiative, which can proceed once it reaches a threshold of 500,000 signatures. The final parliamentary discussion and vote on the amendments to the Constitution itself had been preceded by a public dialogue performed offline via workshops at the municipal level and online via structured questionnaires.

The economic crisis the country has undergone has resulted in the flourishing of social solidarity movements and the appearance of forms of informal solidarity, aimed at helping vulnerable citizens meet their basic needs, including for food, clothing, education and health services and to empower them to co-create an anti-austerity movement.¹³ Such spontaneous solidarity and volunteerism actions have also emerged during the ongoing refugee crisis and, more recently, during the COVID-19 pandemic.¹⁴

To face the COVID-19 pandemic, the government took an early reaction approach and introduced measures affecting freedom of movement and assembly along with the obligation for SMS-based permit requests 'to leave the home'. These measures started escalating from March 2020, peaked during April 2020, were gradually relaxed as of May 2020¹⁵ and then started escalating again as of August 2020. Beyond the physical movement and social distancing restrictions mentioned above, Greece has not taken legal measures to restrict freedoms.¹⁶ Two exceptions to this have been the temporary restriction of freedom of assembly, which has been suspended for gatherings in person in March 2020 and again in September 2020 and a circular that was issued on September 2020¹⁷ by the Attorney-General, criminalising coronavirus denial speech on social media.

Accountability and anticorruption

In the 2019 Index of Public Integrity (IPI), Greece scores 7.23 and holds one of the last positions compared with European Union countries in terms of IPI ranking.¹⁸ Greece has however improved its standing in 2019 in the Transparency International's Corruption Perceptions Index, with a rise

to 60th from 67th place in 2018 out of 180 countries.¹⁹ Transparency International (TI) attributed this improvement in perception to the reforms to tackle corruption that were implemented in the second half of 2019, such as the anti-bribery and anti-corruption provisions of Greek legislation, and to the establishment of the National Transparency Authority.²⁰ TI has underlined, however, that despite structural improvements, progress on reducing corruption has halted in Greece, and the country is saddled with burdensome bureaucracy.²¹

The amendments recently adopted to the Greek Penal Code²² and Penal Procedure Code²³ have brought forward significant changes in anti-corruption legislation, covering an extensive scope of passive and active bribery in the public and private sector and extending the scope of anti-bribery provisions applicability.

The whistleblower protection framework in Greece, however, is much narrower than in other OECD countries. Public officials can seek protection only if they report information that will be used to prosecute a limited number of corruption-related offences. They do not benefit from any incentive or protection measures if they wish to raise ethical concerns internally within their workplace.²⁴

In Greece, senior public officials are obliged to annually disclose their income, assets and liabilities for a time frame of five years following completion of their public function duties. Members of Parliament and members of the Cabinet must have their declarations published online. These declarations are published in PDF format.²⁵

Information on company ownership needs to be provided as open data. In 2019, the Greek Ministry of Finance established procedures for the Central Registry of Beneficial Owners²⁶ introduced by Law No. 4557/2018²⁷ and amended by Law No. 4607/2019²⁸ in an effort to address money laundering and tax evasion. This framework applies to all legal entities registered or engaged in taxable business activity in Greece. The Central Registry of Beneficial Owners is not publicly available, but the Greek Financial Intelligence Unit (FIU) and other public sector and justice authorities conducting audits are entitled to access it. The law provides public access only for certain beneficial ownership information (name, nationality, type and extent of beneficial ownership). Full access to beneficial ownership information can be granted to individuals who demonstrate legitimate interest upon a prosecutor's order.

Budget Transparency

The budget of the Greek state is public, and all public spending activity at national and local level is available in the form of decisions published in open access on Diavgeia portal. The Independent Authority for Public Revenue (AADE) publishes key performance indicators (KPIs) on monitoring the performance of tax and customs administration via the Tax Administration Monitor tool.²⁹

According to the 2019 OECD Budgeting and Public Expenditures report, there are relatively low levels of transparency³⁰ and citizen engagement in the budget process. The government does not publish budget implementation reports and fiscal sustainability reports (which form part of OECD's key budget documents), citizen's guides to budget proposals or approved budgets, budget impact analyses, or gender information alongside the budget, and only budget execution reports are available in open data format.³¹

Apart from those developments, open budget initiatives exist at the municipal and regional level as well.³² In the third action plan the Region of Western Macedonia,³³ the region of Central Greece³⁴ and the Municipality of Thessaloniki³⁵ committed to provide information and monitoring tools to their citizens along with platforms to enable citizens to have their say in decision-making on budget allocation and on the proceedings of prefectural council meetings. According to the Greek IRM End-of-Term Report 2016–2018, the implementation was limited.

The government has made a number of spending decisions related to responding to the COVID-19 crisis. These decisions have been published in the format of Acts of Legislative Content, to be ratified by the Parliament,³⁶ whereas a number of government spending decisions have also been published in the format of Ministerial or Joint Ministerial Decisions. Examples include the €20m COVID-19 public awareness campaign that was directly awarded to a private company without disclosing financial details of the programme and allocation of a €190mn financial package to a number of private companies to implement an e-learning programme for the self-employed, which was later cancelled. The Ministry of Labour launched an investigation.³⁷

Civil society actors have called for more transparency and accountability in the management of COVID-19 pandemic-related decisions in an open letter to the Greek government.³⁸ The issues raised relate to strengthening transparency in public procurement processes, budget planning, whistleblower protection and enhancing public participation.

¹ According to the Public Issue political barometer, conducted by phone on November 6-16, 2018, 65% of respondents said they oppose it, versus 17% in favor and 13% neither in favor nor against. Another 5% of respondents stated that they are not interested or have no opinion on the deal. More information available at <https://www.publicissue.gr/en/>

² Global Right to Information Rating (RTI Rating) webpage for Greece, <https://countryeconomy.com/government/global-right-information-rating/greece>. This index ranks countries giving them a score of 0–150 depending on the strength of their legal framework guarantees for the right to information.

³ OGP (2019). IRM Greece End-of-Term Report 2016-2018. Available at <https://www.opengovpartnership.org/documents/greece-end-of-term-report-2016-2018/>.

⁴ URL: <http://www.oecd.org/internet/digital-government/open-government-data.htm>.

⁵ OECD (2020). The OECD 2019 Open Useful Reusable Data (Ourdata) Index. Available at <http://www.oecd.org/gov/digital-government/ourdata-index-policy-paper-2020.pdf>.

⁶ EUI Democracy Index Report (2019), available at <https://www.eiu.com/topic/democracy-index>. EIU's Democracy Index provides a general overview of the situation of Democracies in 167 independent states. It measures countries' performances in five areas: electoral process and pluralism, the functioning of government, political participation, democratic political culture and civil liberties.

⁷ Freedom in the World Index Report. Data for Greece available at <https://freedomhouse.org/country/greece/freedom-world/2019>. The composite score presented considers Freedom of Expression and Belief, Associational and Organisational Rights, Rule of Law, Personal Autonomy and Individual Rights.

⁸ Following a relevant ruling of the Hellenic Data Protection Authority, Decision No.28/2019, available at https://www.dpa.gr/portal/page?_pageid=33,15453&_dad=portal&_schema=PORTAL.

⁹ Official Government Gazette no.A137, August 29, 2019, available at http://www.et.gr/idos-nph/search/pdfViewerForm.html?args=5C7QrtC22wFqnM3eAbJzrXdtvSoClrL8WkQtRlOjJd5MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKI3nP8NxdnJ5r9cmVWyjWelDvWS_18kAEhATUkjB0x1LlIdQ163nV9K--td6SluYy4kEHGmKxu249n-Zw2yYl0mZ9eBCztpOxx39TqtEEk.

¹⁰ Homo Digitalis (2019). Greece: The new data protection law raises concerns, EDRI. Available at <https://edri.org/greece-new-data-protection-law-raises-concerns/>.

¹¹ World Press Freedom Index (2020), data for Greece available at <https://rsf.org/en/greece>. The WPF Index assesses pluralism, media independence, media environment and self-censorship, legislative framework, transparency, and the quality of the infrastructure that supports the production of news and information.

¹² Available from the Hellenic Parliament website, at <https://www.hellenicparliament.gr/Vouli-ton-Ellinon/To-Politevma/Syntagma/>.

¹³ As an indicative source, cf. the Organosi 2.0 portal, which lists more than 500 self-organized social solidarity initiatives that have been created and have operated during the Greek fiscal crisis. URL: <https://organosi20.gr/>.

¹⁴ As two indicative examples, cf. an open call for information contributions on voluntary help and free goods offered to COVID-19 victims, available at <https://covid19greece.help/>, and a news story about volunteers making and giving away tissue face masks at an Athens fablab, at https://www.athensvoice.gr/greece/638917_ethelontes-sto-ankaa-project-ravoy-n-masks-kaitis-moirazoyn.

¹⁵ Data on COVID-19 Policy Response Stringency from the Oxford Blavatnik COVID-19 Government Response Tracker project, online available at <https://covidtracker.bsg.ox.ac.uk/stringency-scatter>.

¹⁶ Drawing data from the following sources: International Monetary Fund Policy Responses to COVID, webpage <https://www.imf.org/en/Topics/imf-and-covid19/Policy-Responses-to-COVID-19>,

Right to Information RTI-Rating COVID-19 Tracker, webpage <https://www.rti-rating.org/covid-19-tracker/>, ICNL Civic Freedom Tracker, webpage <https://www.icnl.org/covid19tracker/?location=&issue=&date=&type=>, Media FreedomIndex on

- Censorship, webpage <https://www.indexoncensorship.org/disease-control/>, and Suspended Elections IDEA Election Tracker, webpage <https://www.idea.int/news-media/multimedia-reports/global-overview-covid-19-impact-elections>.
- ¹⁷ Available at <https://eisap.gr/%CE%B5%CE%B3%CE%BA%CF%8D%CE%BA%CE%BB%CE%B9%CE%BF%CF%82-16-2020/> (in Greek).
- ¹⁸ Index of Public Integrity (2019), data for Greece available at <https://integrity-index.org/country-profile/?id=GRC&yr=2019>. IPI ranking is based on six transparency indicators, strongly associated with existing corruption indicators and relies on aspects of red tape, transparency, judicial constraints, and social accountability.
- ¹⁹ Transparency International's Corruption Perceptions Index (CPI), data for Greece available at <https://www.transparency.org/en/countries/greece>. TI's CPI measures perceived levels of public sector corruption, determined by expert assessments and opinion surveys.
- ²⁰ URL: <https://www.gedd.gr/index.php?lang=en>.
- ²¹ Transparency International's Corruption Perceptions Index (CPI), data for Greece available at <https://www.transparency.org/en/countries/greece>.
- ²² Published on the Greek Official Government Gazetteno.A95, 11 June 2019 as Law 4619/2019. Available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wFqnM3eAbjzrXdtvSoClrL8smx2PaOMA0btI19LGdkF53Ulx942CdyqxSQYNuqAGCF0lfB9HI6qSYtMQEkEHLwnFqmgJSA5WIsluV-nRwOIoKqSe4BIOTSpEWYhszF8P8UqWb_zFijEvlo-96KN5QRhtXjlrtsGCUfNEKdOeNIYed-CLu6M4.
- ²³ Published on the Greek Official Government Gazetteno.A180, 18 November 2019, as Law 4637/2019. Available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wFqnM3eAbjzrXdtvSoClrL8ogwUOGs3Kf5MXD0LzOTLWPU9yLzB8V68knBzLcmTXKaO6fpVZ6Lx3UnKl3nP8NxdnJ5r9cmWYjWelDvWS_18kAEhATUkjb0xILldQI63nV9K--td6SluWzXvqp-CYPfjQGJL8kZ0rWaXbLostsvNznWtX4IISiN.
- ²⁴ OECD (2018) Greece-OECD Project: Technical Support on Anti-Corruption Technical Report on Whistleblower Protection in the Public Sector in Greece. Available at <https://www.oecd.org/governance/ethics/technical-report-whistleblower-protection-public-sector-greece-en.pdf>.
- ²⁵ Hellenic Parliament, data for 2019 available at <https://www.hellenicparliament.gr/Organosi-kai-Leitourgia/epitropi-elegxouton-oikonomikon-ton-komaton-kai-ton-voleftwn/Diloseis-Periousiakis-Katastasis2019>.
- ²⁶ URL: <https://www.gsis.gr/polites-epiheiriseis/epiheiriseis/mitroo-pragmatikon-dikaioyhon>.
- ²⁷ Official Government Gazette no. A139, 30 July 2018, available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wG3UHk-ZeQumndtvSoClrL8ndsiOD8jfOt5MXD0LzOTLWPU9yLzB8V68knBzLcmTXKaO6fpVZ6Lx3UnKl3nP8NxdnJ5r9cmWYjWelDvWS_18kAEhATUkjb0xILldQI63nV9K--td6SluTZZYaHZBydi0YHiOsJLOWVbo8KKVgfljoZDutqOZ5IFn.
- ²⁸ Official Government Gazette no.A65, April 24, 2019, available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wFqnM3eAbjzrXdtvSoClrL8-e4JlptYxqTtI19LGdkF53Ulx942CdyqxSQYNuqAGCF0lfB9HI6qSYtMQEkEHLwnFqmgJSA5WIsluV-nRwOIoKqSe4BIOTSpEWYhszF8P8UqWb_zFijPnyngtdaCg7E5UstI_iULkAgOZQ0MGiCP3rv7rDjJfz.
- ²⁹ Tax Administration Monitor, webpage <https://www.aade.gr/open-data/KPIs>.
- ³⁰ OECD (2029) Budgeting and Public Expenditures In OECD Countries – Greece Factsheet. Available at <https://www.oecd.org/gov/budgeting/budgeting-and-public-expenditures-2019-greece.pdf>
- ³¹ OECD (2029) Budgeting and Public Expenditures In OECD Countries. Chapter 6. Open, Transparent and Inclusive Budgeting. Available at https://read.oecd-ilibrary.org/governance/budgeting-and-public-expenditures-in-oecd-countries-2018_9789264307957-en#page98.
- ³² As two indicative examples at the municipal level, cf. the City of Athens open budget webpage at <https://www.cityofathens.gr/khe/proypologismos>, and the City of Salonica open budget webpage at <https://opengov.thessaloniki.gr/e-ypiresies/anoikta-diakyvernysi/open-budget>. As an indicative example at the regional level, cf. the Region of Attica open budget webpage at http://www.patt.gov.gr/site/index.php?option=com_content&view=category&id=498&Itemid=688.
- ³³ Budget information available at <https://www.pdm.gov.gr/opengov/open-budget/>, last update December 2018.
- ³⁴ Budget information available at <https://pbplatform.crowdapps.net/sterrea/>, last update February 2019.
- ³⁵ Budget information available at <https://thessaloniki.gr/%CE%B8%CE%AD%CE%BB%CF%89-%CE%B1%CF%80%CF%8C-%CF%84%CE%BF%CE%BD-%CE%B4%CE%AE%CE%BC%CE%BF/%CE%B8%CE%AD%CE%BB%CF%89-%CE%BD%CE%B1-%CE%B5%CE%BD%CE%B7%CE%BC%CE%B5%CF%81%CF%89%CE%B8%CF%8E/%CE%B4%CE%B9%CE%B1%CF%86%CE%AC%CE%BD%CE%B5%CE%B9%CE%B1-%CE%BB%CE%BF%CE%B3%CE%BF%CE%B4%CE%BF%CF%83%CE%AF%CE%B1/%CF%80%CF%81%CE%BF%CF%85%CF%80%CE%BF%CE%BB%CE%BF%CE%B3%CE%B9%CF%83%CE%BC%CF%8C%CF%82/>, last update January 2020.
- ³⁶ A series of 7 successive Acts of Legislative Content have been issued by the government March–May 2020. The first one was issued on 11 March 2020 (Official Government Gazette no.A55, online available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wHUdWr4xouZundtvSoClrL8ExDiwSlm0cLlI19LGdkF53Ulx942CdyqxSQYNuqAGCF0lfB9HI6qSYtMQEkEHLwnFqmgJSA5WIsluV-nRwOIoKqSe4BIOTSpEWYhszF8P8UqWb_zFijP3fNjb3qKpGxGNtXU_uAtLw56ULsxCc54tGXdl9oyQI), and the last one was issued on May 1, 2020 (Official Government Gazette no.A90, online available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wHUdWr4xouZundtvSoClrL8APWkZGpLIbntI19LGdkF53Ulx942CdyqxSQYNuqAGCF0lfB9HI6qSYtMQEkEHLwnFqmgJSA5WIsluV-nRwOIoKqSe4BIOTSpEWYhszF8P8UqWb_zFijOMefgdRWM9_NshoOb5sUFtcPKtRjQw9_3pped2pxY0).
- ³⁷ Fotiadis A (2020) *As the pandemic subsides, Greeks will soon want answers on public finances*, The Guardian, available at <https://www.theguardian.com/commentisfree/2020/jun/16/pandemic-greece-public-finances-covid-19>

³⁸ Transparency International Greece & GFOSS, March 31, 2020, Letter to the Minister of State Mr Giorgos Gerapetriti and to the Deputy Minister to the Prime Minister for Government Coordination Mr Aris Skertsos, available at <https://opengov.ellak.gr/2020/03/31/apetite-diafania-simmetochi-ke-logodosia-sti-diachirisi-tis-pandimias-tou-covid-19/>.

III. Leadership and Multistakeholder Process

The Ministry of Administrative Reconstruction (MAR) led the OGP process for the development of the fourth action plan, although responsibility moved to the Ministry of Digital Governance after the July 2019 general election. The action plan process had limited opportunities for civil society and public engagement. To have an effective ongoing dialogue, the OGP process in Greece needs to have a multistakeholder forum, and meaningful opportunities for the public and civil society to propose or shape commitments.

3.1 Leadership

This subsection describes the OGP leadership and institutional context for the OGP process in Greece.

The development of the fourth action plan was led by the Ministry of Administrative Reconstruction's (MAR), Transparency and Open Government Department that had been responsible for monitoring and coordinating Greece's participation in the Open Government Partnership. At the political level, the process was led by Minister of Administrative Reconstruction Ms Mariliza Xenogiannakopoulou, and at the National Point of Contact level, the process was staffed by Ms Nancy Routzouni, MAR senior staff and policy advisor to Minister Xenogiannakopoulou. MAR's Transparency and Open Government Department was staffed by four persons, working on the action plan process at approximately 20% of their time. This personnel capacity is comparable to the staffing of the team that drafted the third action plan of Greece in 2016, comprising Ms Routzouni as head and three additional members.¹

Shortly after the adoption of the action plan, the country held parliamentary elections, and the New Democracy party won in July 2019. With the subsequent change of government and policy, MAR was dissolved, and its mandate and portfolio was absorbed for the most part into the newly established Ministry of Digital Governance (MDG) and for a remaining small portion, into the Ministry of Interior (MI).² As a result, the Ministry of Digital Governance (MDG) has since been in charge of the OGP process in Greece. The National Point of Contact for OGP is the same person as before (Ms Nancy Routzouni)³, now having moved to MDG, and the National Representative for OGP is now the Deputy Minister for Digital Strategy Mr. Grigoris Zarifopoulos. Some former MAR staff with OGP-related experience have moved to MDG.⁴

The mandate of the Ministry of Digital Governance is to continually promote Greece's digital and administrative transformation and the country's adaptation in the rapidly changing international environment.⁵ The Department of Open Government and Transparency of MDG (a unit under the Directorate of Electronic Government and the General Directorate of Digital Government) is responsible for designing and applying policies on open data, evaluating proposals for new added value services from the public sector and the civil society, and for Greece's participation in OGP.⁶ It is not clear to what extent these institutional changes will result in a better positioning for advancing Greece's OGP process, especially in relation to policy areas that do not explicitly fit within the open data or digital transformation portfolio.

Currently MDG's political leadership is emphasising Greece's digital transformation, of which digital government services and open public data are a part. MDG's response to the COVID-19 public health crisis has focused on deployment of digital government services⁷ rather than of open government actions, with one exception for a volunteer sign-up service.⁸

A government decision of August 2019⁹ established the National Transparency Authority (NTA)¹⁰ whose mandate includes enhancing transparency, integrity and accountability in the public sector.¹¹ As this new body assumed all the responsibilities of the five main auditing public bodies, the country's OGP process is still not part of its core mandate.

3.2 Action plan co-creation process

The process of developing Greece's National Action Plan started in April 2019. The final plan was published a month later, in May 2019. In this time, the Ministry of Administrative Reconstruction held two internal meetings with other government departments and conducted a short public consultation. One meeting was held with civil society groups before the public consultation. There was no multistakeholder forum that operated during the co-creation process for the fourth action plan.¹²

The thematic focus of the action plan was decided by government and mainly based on the need to address delays¹³ in implementing legislation mandating that public data be open by default.¹⁴ Though there was no broad civil society or public input, general campaigning by civil society organisations such as GFOSS (Open Technologies Alliance) and a report on the value of open public data on 8 October 2018 published by the Federation of Greek Industries (FGI)¹⁵ supported open data actions which may have indirectly influenced MAR's interest in publishing open data.¹⁶

MAR organised two internal public sector meetings,¹⁷ one before and one after the online consultation period. The first internal public sector meeting was attended by representatives of 17 Ministries and of the Independent Authority for Public Revenue. The second internal public sector meeting was attended by representatives of 16 Ministries, and by Minister of State Mr. Alexandros Flambouraris and Minister of State Mr. Dimitris Tzanakopoulos. The minutes of these meetings have not been made public. However, according to the information gathered for this report, these meetings included presentations of the general directions for the action plan, discussion on the issues involved in opening up public data, but otherwise limited guidance towards the ministries or scoping of ideas for commitments on behalf of the latter.¹⁸ Some ministries attended meetings but did not provide input, whereas other public bodies did become part of commitments, although they never attended these meetings. Participants of these meetings note that they had not been given sufficient information and time for formulating commitments, contrary to what was the case in the context of the third action plan co-creation process.¹⁹

Following the first internal public sector meeting, MAR called a meeting with four civil society stakeholders (GFOSS, Vouliwatch, Transparency International Greece and FGI). The minutes of this meeting have not been published but, according to the information MAR provided,²⁰ only representatives of GFOSS were able to participate in this meeting. According to interviews with CSOs and government representatives,²¹ this meeting included presentations by MAR, an intervention by GFOSS and no further discussion.

Dissemination and awareness raising of the action plan process did not take place with wider external stakeholders. Most external stakeholders who were surveyed²² reported not receiving information from government on the action plan and thus not having been involved in the co-creation process. CSO representatives²³ stressed that the short notice and short time windows allowed for providing input in the meeting and the public consultation restricted participation. The four civil society representatives who had been invited to a meeting said that they had received information from government about the action plan. Some had sent in inputs and proposals, but none have received feedback from government.^{24,25,26} In fact, during the co-creation process overall, the only tangible information provided by the government was the draft action plan text itself.²⁷ These CSO stakeholders' proposals included training for public officials and actions to improve the quality of open data²⁸ and on improvements to the process of opening data.²⁹ These proposals were not included in the final action plan. Additionally, two individuals³⁰ reported that MAR gave them information on the action plan and they have provided their inputs. From those two individuals, the first one³¹ reports having received no feedback at all, the second one³² reports having received some feedback and engaged in dialogue, and both report that finally their proposals were not included in the final action plan, without a reasoned response having ever been provided.

The public consultation of the draft action plan that took place on the OpenGov.gr platform³³ lasted a total of seven calendar days (from 7 May to 14 May 2019) and gathered a total of four comments. One comment by GFOSS³⁴ concerned the action plan as a whole, mentioned that the action plan does not fully cover OGP values and resubmitted the GFOSS proposals. One individual³⁵ commented negatively on the sole focus of the action plan being on open data, and another³⁶ criticised commitment 7 as having not in fact created any commitment at all. One comment by a public official³⁷ concerned stressed that the National Centre for Public Administration and Local Government (NCPALG) has an institutional role for knowledge development and should be allocated the role of an institutional partner in the OGP process. No feedback has been published that addresses these comments. They were collectively responded to with a brief statement posted online by Minister of Administrative Reconstruction Ms Mariliza Xenogiannakopoulou, who was at that time the political level representative for the OGP process in Greece, stating that they shall be given serious consideration for the next steps of the process, without providing any further reasoned feedback.

The previous action plan was informed with opinions and proposals from a more diverse set of stakeholders both within and outside of government, rather than for the development process for the fourth action plan itself. The third action plan, the Greek government initiated a bottom-up process for the third action plan, whereas this action plan appears directed by government with little input from civil society. According to Routzouni & Gritzalis (2018),³⁸ *'The development process of the 3rd NAP adopted an open, innovative procedure for its "co-creation", through a structured, cooperative process of consultation between public administration entities and Civil Society Organizations. The government used communication channels and cooperative procedures and worked together with various actors and stakeholders to define specific policy areas in which open governance constitutes the main prerequisite to essentially boost accountability, integrity and citizens participation.'* During the online consultation process of the third action plan, 24 comments were received, many more than in the fourth action plan.

At the same time, in terms of content, the third national action plan included commitments from several ministries, civil society organisations, subnational governments and the Parliament. Two

civil society organisations (CSOs), Open Knowledge Foundation Greece and Open Technologies Alliance (GFOSS), were directly involved in the action plan development and contributed their own commitments (Commitment 30 on Open Data Index for cities and local administrations, Commitment 31 on Linked, Open and Participatory Budgets, Commitment 32 on School of data for public servants and Commitment 33 on The collaborative wikification of public services procedures) with an aim to implement them on their own.

Returning to the fourth action plan, the final version included two commitments that were not in the draft action plan. No evidence suggests they were added in response to proposals civil society made or through the public consultation comments. At the same time, the corresponding lead agencies did not mention collaboration with any external stakeholders in order to develop the proposals.³⁹ As this was also confirmed by the National Point of Contact,⁴⁰ these two commitments have been internally developed without any consultation with CSOs and without being subjected to public consultation.

In parallel with the process, Minister Xenogianakopoulou publicly pledged her support to open governance and named it a central priority for the government and a core component of the digital transformation of the country.⁴¹ In the final stage of action plan development, four awareness meetings internal to the public sector with a total of 170 public officials participating were organised during May 2019 with the minister's presence in order to promote the action plan, the value of open data in public administration and the need to familiarise public officials with open data use.⁴²

The way the process ran meant that it did not provide meaningful opportunities for participation of non-governmental stakeholders, leading to an action plan only focused on open data and with reduced buy-in and ownership from civil society. In essence, this action plan was produced by the ministries which introduced the respective commitments, and citizens were allowed to give their input only at the stage of online consultation, only lasting for 7 days. There was no substantive feedback following the consultation exercise. The action plan was submitted on May 2019 after numerous delays (nine months past the August 2018 deadline), which also resulted in an OGP cohort shift for the country from even-year to odd-year participants⁴³ and following considerable pressure from stakeholders outside government focused on just launching the process rather than on particular commitments.⁴⁴ The government gave non-governmental stakeholders very little chance to influence the actual contents of the plan, no meaningful iterative dialogue took place, and the selected commitments were decided solely by the government. This is the reason the action plan commitments lack ambition beyond the legal obligations to publish open datasets.

The main weakness of the fourth action plan co-creation process has been the lack of sufficient public engagement and extremely short time frame for developing commitments. This has resulted in a number of shortcomings in the quality of commitments discussed in detail in Section IV. At the same time, this has resulted in a very low level of buy-in of the action plan by civil society.

Based on the fact that, during the process there was an online public consultation in which the public could give input, even in a practically restricted way, the level of public influence during development of the action plan is assessed as Consult. This means therefore that Greece has acted contrary to the OGP process.

Table 4: Level of Public Influence

The IRM has adapted the International Association for Public Participation’s (IAP2) “Spectrum of Participation” to apply to OGP.⁴⁵ This spectrum shows the potential level of public influence on the contents of the action plan. In the spirit of OGP, most countries should aspire for ‘collaborate’.

Level of public influence		During development of action plan
Empower	The government handed decision-making power to members of the public.	
Collaborate	There was iterative dialogue AND the public helped set the agenda.	
Involve⁴⁶	The government gave feedback on how public input were considered.	
Consult	The public could give inputs.	✓
Inform	The government provided the public with information on the action plan.	
No Consultation	No consultation	

OGP Participation and Co-Creation Standards

In 2017, OGP adopted OGP Participation and Co-Creation Standards to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP-participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

The following table provides an overview of Greece’s performance implementing the Co-Creation and Participation Standards throughout the action plan development.

Key:

Green = Meets standard

Yellow = In progress (steps have been taken to meet this standard, but standard is not met)

Red = No evidence of action

Multistakeholder Forum	Status
1a. Forum established: There is no evidence that a multistakeholder forum was setup in the context of the fourth action plan design process and subsequent implementation. ⁴⁷ There was one meeting set up between government and civil society.	Red

1b. Regularity: There was only one meeting between government and civil society.	Yellow
1c. Collaborative mandate development: There is no evidence to show collaborative development of the process for cocreating the action plan or running the forum.	Red
1d. Mandate public: There is no evidence to show a public mandate (as a forum does not exist).	Red
2a. Multistakeholder: There was only one meeting between civil society and government.	Yellow
2b. Parity: There was only one meeting between civil society and government, but it is unclear that any decisions were taken in this meeting. It appears that government alone made decisions.	Red
2c. Transparent selection: It is not clear how participants in meetings were selected.	Red
2d. High-level government representation: According to evidence, some other Ministers beyond the MAR Minister participated in at least one internal public sector meeting.	Yellow
3a. Openness: It is not clear if inputs from external stakeholders and the public were considered by government.	Red
3b. Remote participation: Although a multistakeholder forum was not setup, there still was an online public consultation, albeit limited in scale and time.	Yellow
3c. Minutes: No minutes of meetings are available.	Red

Action Plan Development	Status
4a. Process transparency: The Prime Minister's official website ⁴⁸ , the official Greek Government website ⁴⁹ , and the Ministry of Digital Governance website ⁵⁰ do not contain a section on the country's OGP process with relevant information. The OpenGov.gr platform, which includes an Open Government section, contains a link to the country's webpage on the OGP website, without providing any further information on the ongoing OGP process. On these grounds, and as no further information or facts have been found to serve as evidence of the existence of an OGP website.	Red
4b. Documentation in advance: There is limited evidence demonstrating that the Government shared information about OGP in advance to facilitate informed and prepared participation in all stages of the process. Only some non-governmental stakeholders have said they were given draft copies of the action plan in advance.	Yellow

4c. Awareness-raising: There is very little evidence demonstrating that the Government conducts outreach and awareness-raising activities with relevant stakeholders to inform them of the OGP process. Only some non-governmental stakeholders have said they were informed of the action plan process.	Yellow
4d. Communication channels: There were limited examples of Government directly communicating with some stakeholders in response to action plan process questions.	Yellow
4e. Reasoned response: There is no evidence demonstrating that the Government published a reasoned response behind decisions or major categories of public comment. There was only a general message from the minister that comments in the public consultation would be considered, which was released upon completion of the public consultation, prior to further steps for finalisation of the action plan. ⁵¹	Red
5a. Repository: There is no evidence that a multistakeholder forum or the Government has documented, collected, and published a repository on the domestic OGP website in line with IRM guidance ⁵² .	Red

¹ Cf. Greece Third National Action Plan on Open Government 2016-2018, available at

https://www.opengovpartnership.org/wp-content/uploads/2001/01/GREEK_NAP3-OGP-ENG.pdf, p.3.

² Presidential Decree 81/2019, Official Government Gazette no.A119, July 8, 2019, available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wFqnM3eAbJzrXdtvSoClrL8NZ_IN6a-NQ55MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKI3nP8NxdnJ5r9cmWvyjWelDvWS_I8kAEhATUkj0x1LldQ163nV9K--td6SluULGAORo3FzfkKkdRkMh_cNeshXpOp9u5AbBwdzaydUB.

³ Ms Routzouni is senior staff, and beyond acting as National Point of Contact for the OGP process she has a number of additional roles: (a) Coordinator for the co-development of the National Digital Transformation Strategy 2020 - 2025, which identifies the necessary principles, processes and actions aimed at developing horizontal policies for the digital transformation, and more than 300 projects specified in cooperation with line Ministries; Digital Transformation Delivery Manager, accountable for the monitoring and delivery of the national digital transformation projects; Coordinator of the Digital Transformation Delivery Managers inter-ministerial team; member of the 2021-2027 ICT strategy formulation team of the Ministry's Managing and Implementing Authority for ICT; National Anchor Point for ELRC, the European Language Resource Coordination initiative; member of the OECD Thematic Group on Emerging Technologies; and member of the OECD Working Party on Open Government.

⁴ For instance, from the public sector staff contacted for this research, Ms Aggeliki Balou and Mr Athanasios Sklapanis.

⁵ Ibid., Article I Paragraph 1.

⁶ Ibid., Article 19 Paragraph 6.

⁷ See section II. Open Government Context in Greece for reference to a number of such services.

⁸ URL: <https://ethelontes.gov.gr/>. This is the only action from Greece mentioned in OGP's Collecting Open Government Approaches to COVID-19 webpage, available at <https://www.opengovpartnership.org/collecting-open-government-approaches-to-covid-19/>, which however lists more than 400 such actions from countries worldwide.

⁹ Law 4622/2019, Official Government Gazette no.A133, August 7, 2019, available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wFqnM3eAbJzrXdtvSoClrL8NXGWS3cU8Kt5MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKI3nP8NxdnJ5r9cmWvyjWelDvWS_I8kAEhATUkj0x1LldQ163nV9K--td6SluRmo9qrjUJMOq2O30kMOMg7ZNfjn86oicoBs0fePDGfg.

¹⁰ Official website: <https://aead.gr/>.

¹¹ Ibid., Article 82, Paragraph 1.

¹² Information provided by A.Sklapanis, serving in MAR at the time of the fourth action plan co-creation process and currently serving in the Ministry of Digital Governance, through email communication (response provided on 28 May 2020).

¹³ As an indicative example, see Section IV. Commitments, analysis of commitment 4, by the Ministry of National Defense.

¹⁴ Law 4305/2014, Official Government Gazette no.A237, October 21, 2014, available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wEc63YDhn5AeXdtvSoClrL8oeKAuTKOuiV5MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKI3nP8NxdnJ5r9cmWvyjWelDvWS_I8kAEhATUkj0x1LldQ163nV9K--td6SlubMfh2r_a2DXjO6MjNF-5f9_LW7pRMszX0fGIIINVmMlh, Article 2.

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- ¹⁵ “Open public data as a basic pillar for the digital transformation of the country” (FGI, 2018), available at http://www.sev.org.gr/Uploads/Documents/51549/SR_Open_Data_8_10_2018.pdf.
- ¹⁶ European Data Portal Open Data Maturity in Europe Report 2018, Available at https://www.europeandataportal.eu/sites/default/files/edp_landscaping_insight_report_n4_2018.pdf.
- ¹⁷ Information provided by A. Sklapanis, Ministry of Digital Governance, through email communication, as detailed in VI. Methodology and Sources.
- ¹⁸ Information collected through email interviews with the commitment lead contacts, as detailed in Section IV.
- ¹⁹ See section IV. Commitments, analysis of commitment 9, based on information provided by the Ministry of Justice, former Ministry of Justice, Transparency and Human Rights.
- ²⁰ Information provided by A.Sklapanis, Ministry of Digital Governance, through email communication.
- ²¹ Information collected through phone interviews with D. Mitropoulou (GFOSS), A. Melidis (independent researcher), S. Loucopoulos (Vouliwatch) on 17 July 2020 and cross-checking phone interview with National Contact Point, on July 20, 2020.
- ²² E. Alevritou, CSO actor, E.K.PI.ZO.; Y. Charalambidis, academic expert, University of the Aegean; P. Georgiadis, academic expert, National and Kapodistrian University of Athens, formerly having served in two Secretary General positions of the Greek public sector; A. Deligkiaouri, academic expert, Dublin City University, not present in Greece at the time of the fourth action plan co-creation process; M. Karatza, CSO actor, Place Identity Clusters; S. Katsikas, academic expert, Open University of Cyprus, not present in Greece at the time of the fourth action plan co-creation process but formerly having served in a Secretary General position of the Greek public sector; V. Kostakis, independent researcher, P2P Lab; L. Merakos, academic expert, National and Kapodistrian University of Athens; M. Spourdalakis, academic expert, National and Kapodistrian University of Athens; E. Tambouris, academic expert, University of Macedonia; K. Tarabanis, academic expert, University of Macedonia; E. Thanou, CSO actor, Doctors Without Borders; A. Veizis, CSO actor, Doctors of the World; N. Vlaikidis, CSO actor, UNHCR Office in Athens; S. Vitoratos, CSO actor, Homo Digitalis; and T.Vratimos, CSO actor, GIVMED.
- ²³ G.Giannakopoulos, CSO actor, SciFY, and one more CSO actor who prefers to stay anonymous.
- ²⁴ Information provided by S.Loukopoulos, through email communication, as detailed in VI. Methodology and Sources.
- ²⁵ Information provided by A.Damaskou, through email communication, as detailed in VI. Methodology and Sources.
- ²⁶ The proposals provided by GFOSS have been reported via a third source.
- ²⁷ Information provided by A.Melidis, independent researcher.
- ²⁸ Drawing on the “Survey on the impact of reusing open data for the public sector and the general economy”, Expertise France, September 9, 2017, available through the GFOSS website at https://ellak.gr/wiki/index.php?title=Survey_on_the_impact_of_reusing_open_data_for_the_public_sector_and_the_general_economy.
- ²⁹ Drawing on the GFOSS open access course on Open Data & Public Bodies, available at <https://elearn.ellak.gr/course/view.php?id=54>.
- ³⁰ S. Loucopoulos, VouliWatch; and S. Athanassiou, Athena Research and Innovation Center in Information Communication and Knowledge Technologies.
- ³¹ S.Loucopoulos, VouliWatch.
- ³² S.Athanassiou, Athena Research and Innovation Center in Information Communication and Knowledge Technologies.
- ³³ URL: <http://www.opengov.gr/minreform/?p=2220>.
- ³⁴ Available at <http://www.opengov.gr/minreform/?c=5625>.
- ³⁵ Available at <http://www.opengov.gr/minreform/?c=5624>.
- ³⁶ Available at <http://www.opengov.gr/minreform/?c=5622>.
- ³⁷ Comment by A.Papastilianou, NCPALG officer, available at <http://www.opengov.gr/minreform/?c=5623>.
- ³⁸ Routzouni, A., & Gritzalis, S. (2018). The Civil Society as an Innovation Partner in Public Policy Making: Co-Creating the Greek National Action Plan on Open Government. In *Proceedings of the 12th Mediterranean Conference on Information Systems (MCIS)*, Corfu, Greece, 2018. Online available at http://www.icsd.aegean.gr/publication_files/Conference/140441986.pdf.
- ³⁹ See section IV. Commitments, analysis of commitment 10, based on information provided by staff at Ministry of Environment and Energy, and analysis of commitment 11, based on information provided by staff at Ministry of Culture and Sports.
- ⁴⁰ Information confirmed by phone interview with the Greece National Contact Point Ms. Nancy Routzouni, on 1 Oct 2020.
- ⁴¹ Speech of the Minister of Administrative Reconstruction at the 9th Annual eGov Forum, 27th March 2019, press release available at <https://www.ypes.gr/mariliza-xenogiannakopoyloy-psifiaki-stratigiki-gia-ti-chora-kai-ton-dimosio-tomea/>, and presentation (May 15, 2020) of the Fourth Action Plan by the Minister of Administrative Reconstruction, MarilizaXenogianakopoulou, press release available at <https://www.ypes.gr/paroyiasi-toy-tetartoy-ethnikoy-schedioy-drasis-gia-tin-anoikti-diakyvernisi-apo-tin-ytoyrgo-dioikitikis-anasygkrotisis/>.
- ⁴² These meetings took place on 15 May, 20 May, 30 May and 31 May 2019, as reported in the MAR press release “Empowerment of the policy for open data (Organization: Ministry of Administrative Reconstruction – Dept of Transparency and Open Government)” available at <https://www.nationalcoalition.gov.gr/open-data-events/>.
- ⁴³ Cf. Greece – Notification of Late Action Plan (Cohort Shift) – January 2019, <https://www.opengovpartnership.org/documents/greece-notification-of-late-action-plan-cohort-shift-january-2019/>.
- ⁴⁴ Information provided by A.Deligiannis, International Hellenic University and A.Melidis, independent researcher.
- ⁴⁵ “IAP2’s Public Participation Spectrum” (IAP2, 2014), available at http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf.
- ⁴⁶ OGP’s Articles of Governance also establish participation and co-creation requirements a country must meet in their action plan development and implementation to act according to OGP process. Based on these requirements, Greece acted contrary to OGP process during the development of the 2019-2021 action plan.
- ⁴⁷ It must be noted that the online public consultation process of the fourth action plan on the OpenGov.gr platform (May 2019) cannot qualify as such a multistakeholder forum, given that the consultation process lasted for 7 calendar days, received only 4 comments and these were replied with a generic statement without concrete explanations and reasoned feedback on their

eventual use for further informing the process. Therefore, this online space has lacked the persistency, participation and interaction necessary to be considered as a multistakeholder forum.

⁴⁸ URL: <https://primeminister.gr/en/home>.

⁴⁹ URL: <https://government.gov.gr/>.

⁵⁰ URL: <https://mindigital.gr/>.

⁵¹ Information confirmed by phone interview with the Greece National Contact Point Ms Nancy Routzouni, on 1 Oct 2020.

⁵² Available at https://www.opengovpartnership.org/wp-content/uploads/2019/03/IRM-Guidance-for-Repositories_to-share.pdf.

IV. Commitments

All OGP-participating governments develop OGP action plans that include concrete commitments over a two-year period. Governments begin their OGP action plans by sharing existing efforts related to open government, including specific strategies and ongoing programs.

Commitments should be appropriate to each country's circumstances and challenges. OGP commitments should also be relevant to OGP values detailed in the *OGP Articles of Governance and Open Government Declaration* signed by all OGP-participating countries.¹ Indicators and methods used in the IRM research can be found in the IRM Procedures Manual.² A summary of key indicators the IRM assesses can be found in the Annex of this report.

General Overview of the Commitments

The commitments of Greece's fourth action plan aim to further promote open access and reuse of public sector data. Each commitment corresponds rigidly to one public body that undertakes the release of data from its domain of responsibility, without commitments for cross-sectoral collaboration or horizontal policies.³ The commitments address some challenges for transparency and access to information and, in some cases, budget transparency. Non-governmental stakeholders noted that commitments refer to open data release actions which are already mandatory under open-by-default national legislation.⁴ According to the legal framework mentioned in the commitments, which came into force at the end of 2014, the datasets should have been made open to the public by default four years ago.

The fourth action plan does not contain as diverse commitments as the previous action plan did, for instance, at the subnational level, commitments on parliamentary procedures or commitments on participatory governance. Recommendations from the previous implementation report have not been incorporated into the commitments for this action plan.⁵ In fact, non-governmental stakeholders commented that commitments are narrowly perceived and confined to open data and digital government which, even if completed and implemented fully, remains limited in scope, does not really correspond to the full framework of open governance principles and leaves important aspects out.⁶ At the same time, this unilateral focus lacks originality, represents a downgraded impact/coverage compared with past actions plans, is not current with rapid international developments, does not move forward the open government agenda in Greece, does not provide a clear indication that public authorities wish to make use of the OGP as an opportunity to implement truly innovative and reformative policies and risks fatiguing stakeholders.⁷

In particular, non-governmental stakeholders have voiced critical opinions on the lack of clarity about which datasets are to be opened or how they will be chosen.⁸ There is a lack of clarity on the specific objectives for each commitment, assessments of the current situation, plans for implementation and criteria to ensure data quality.⁹ Further concerns were raised about respecting data privacy,¹⁰ accessibility of data in user-friendly ways¹¹ and the technical skills gap inside government.¹²

Non-governmental stakeholders also mentioned that the commitments could benefit from focusing on data quality and engaging with data users more actively¹³ to working on thematic priorities including healthcare, education, social security, consumer protection, human rights and parliamentary procedures.¹⁴ They also stated that to address the full spectrum of open

government, more commitments are needed on transparency, with special emphasis on process transparency; public oversight and accountability; increased interaction between the public and administrations; civic participation and e-participation, with emphasis on participation in decision-making; and deliberative democracy designs.¹⁵

¹ “Open Government Partnership: Articles of Governance” (OGP, 17 Jun. 2019), <https://www.opengovpartnership.org/articles-of-governance/>.

² “IRM Procedures Manual” (OGP), <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

³ Critical reflection shared by S.Gritzalis and M.Spourdalakis.

⁴ Critical reflection shared by A. Melidis, A. Deligiannis and S. Athanassiou.

⁵ Critical reflection made by A. Melidis, former IRM national researcher for Greece.

⁶ Critical reflection shared by S. Loucopoulos and M. Karatza.

⁷ Critical reflection shared by S. Loucopoulos, S. Athanassiou, S. Gritzalis, A. Deligkiaouri, G. Giannakopoulos, P. Georgiadis and A. Deligiannis.

⁸ Critical reflection shared by N.Vlaikidis, V.Zorkadis and K.Tarabanis.

⁹ Critical reflection shared by E.Tambouris, Y.Charalambidis, S.Katsikas and G.Giannakopoulos and a CSO actor who prefers to stay anonymous

¹⁰ Critical reflection shared by S. Vitoratos, A. Deligkiaouri, V. Zorkadis, L. Merakos and S. Katsikas.

¹¹ Critical reflection shared by E. Thanou and A. Deligkiaouri.

¹² Critical reflection shared by S. Vitoratos, A. Deligkiaouri, V. Zorkadis, L. Merakos, S. Katsikas, G. Giannakopoulos, M. Karatza, S. Vitoratos and E. Alevritou.

¹³ Critical reflection made by P. Georgiadis, E. Tambouris, K. Tarabanis, S. Gritzalis, G. Giannakopoulos and V. Kostakis, respectively.

¹⁴ Critical reflection shared by E. Thanou, T. Vratimos, E. Alevritou, P. Georgiadis, V. Zorkadis, M. Karatza, S. Katsikas and S. Loucopoulos

¹⁵ Combining criticisms made by S. Athanassiou, S. Vitoratos, S. Gritzalis, A. Deligkiaouri, M. Karatza and S. Loucopoulos.

1. Open access to data of the Ministry of Education, Research and Religious Affairs

Main Objective

The published NAP mentions (p. 7-8) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Education, Research and Religious Affairs and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

"Objectives: 1) Web services for data mining (API).

2) Integration of new datasets.

3) Mobilisation of entities of the Ministry of Education, Research and Religious Affairs for data publication.

4) Improvement of the quality of datasets.

5) Open data release decisions."

Milestones

The published NAP mentions (p.8) the milestones for this commitment as follows:

"1) Web services for data mining (API)

2) Integration of new data

3) Activation of Ministry of the Environment (s) for data publication

4) Improving data quality

5) Data Release Decisions."

Editorial Note: For the complete text of this commitment, please see Greece's action plan at [https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece Action-Plan 2019-2021 EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf), p.7-8.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	Minor

Commitment analysis

This commitment aims to publish statistical and education data held by the Ministry of Education, Research and Religious Affairs (MERA). Since the action plan was adopted, the ministry was renamed the Ministry of Education and Religious Affairs.

The commitment is verifiable, but it has a very low threshold, as it does not contain details about the criteria for choosing datasets or how to decide to publish them. The commitment has sufficient relevance to the Access to Information OGP value because, if implemented fully, it will lead the government to disclose more statistical and education-related information (milestones 2 and 5) and improve the quality of the information disclosed to the public (milestone 4).¹

As of May 2019, MERA had published more than 250 datasets on Data.gov.gr² and fewer than 10 open datasets on Geodata.gov.gr.³ Most of this information is annual statistical information about education, including student populations, registers of schools and libraries, details of teaching staff and personnel changes. Despite having published many datasets, MERA's official website⁴ has not been found to contain published reports on the lead agency's open data policy and practice. Reports on user satisfaction and uptake of data sets have not been identified. MERA confirmed that no web services and/or APIs existed already upon release of the action plan (May 2019). They said that the new data published (milestone 2) would refer to 2018 statistical data. The Ministry clarified that machine readability and ability for reuse through Creative Commons licenses apply for the most part to data already published. Concerning milestone 5, MERA clarified that there had been two open data release decisions,⁵ one in 2018 and one in 2019.

Due to the lack of clear details or identification of datasets, even small advancements may be considered completed results. The lead agency, asked about taking into consideration any experience from implementation of the previous action plan in the design of this commitment, or integrating feedback from the action plan co-creation process, did not affirm either of these.⁶ MERA mentioned that the rationale behind choosing datasets to open is based on availability and quality, which have been used as criteria to identify the datasets mentioned in the action plan (registration requests in secondary schools and substitute teacher recruitment for primary education) as well and stated that no relevant stakeholders outside the public sector are involved in this process.

The overall potential impact of the commitment is coded as minor. The commitment, if fully implemented, is expected to make available more datasets and improve the quality for reuse, but it is not clear how it will respond to the needs for 'development and participation of citizens', as indicated in the commitment objective. In terms of government practice, the commitment is unclear about whether it may create noticeable change in the responsibilities or operations of the public institution other than what is already stipulated by the law on access to public sector information.⁷ In terms of ambition, milestone 1 on web services constitutes an ambition which, although not technologically innovative, departs from current practice, as no APIs currently exist. The remaining milestones and activities do not depart from current practice and, at the same time, do not constitute any step forward beyond what is already mandatory to achieve according to legislation; thus, they are not considered ambitious.

For future commitments, it would be important to bring in non-governmental stakeholders to identify priority datasets. Non-governmental stakeholder interviews revealed at least two high-value information sets they would like to see published. Academic experts⁸ mentioned higher education datasets in general and more specifically the case of datasets with information about university students, some of which are currently published in an overly fragmented and very poor-quality format. At the same time, further desktop research⁹ revealed a number of topical issues for this ministry's domain of responsibility, for which publishing open data would have a

value and could improve policies and processes. These topics include information around the exams for entering higher education, teacher recruitment, problems in schools, responses to teacher and student mobilisations, changes to school regulations and educational support for underprivileged groups (wildfire victims, remote area inhabitants, refugees, non-Greek nationals, persons with special needs).

¹ The commitment meets some basic requirements for this value as (a) it pertains to government-held information; and (b) it provides open access to information (milestone 5). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (c) not be restricted to data but pertain to all information; (d) promote transparency of government decision making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

²Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/minedu?q=&sort=metadata_modified+asc.

³Data sets searched through webpage <http://geodata.gov.gr/organization> and query http://geodata.gov.gr/organization/yppopai?q=&sort=metadata_modified+asc.

⁴<http://www.minedu.gov.gr/>, as mentioned in the official catalogue of the Hellenic Parliament, at <https://www.hellenicparliament.gr/en/news/links/ministries>.

⁵ An open data release decision is a formal decision taken by a public sector agency which prescribes, in a closed way, the data sets maintained by this agency that must be released as open data.

⁶ Email response to the interview questionnaire sent to MERA. Response provided, on 27 May 2020 by Mr. Ioannis Tsourakis, referred to by Mr. Georgios Daskalogiannis, MERA lead contact.

⁷According to Law 4305/2014, Official Government Gazette no. A237, 21 October 2014, available at http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wEc63YDhn5AeXdtvSoClrL8oeKAuTKOuiV5MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKl3nP8Nxdnj5r9cmWyjWelDvWS_18kAEhATUkj0x1LlIdQl63nV9K--td6SlubMfH2r_a2DXjO6MjnF-5f9_LW7pRMszX0fGIINvmMlh

⁸P.Georgiadis, academic expert on electronic governance and former public sector official (Secretary General for Information Systems and Electronic Governance), and Y.Charalambidis, academic expert on open data and electronic government.

⁹ Concerning Commitment I - Open access to data of the Ministry of Education, Research and Religious Affairs, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/lp5Gjg>; <https://cutt.ly/wp5G0J>; <https://cutt.ly/9p5Hz8>; <https://cutt.ly/kp5HYrn>; and <https://cutt.ly/3p5HGjD>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): allowances and services for students and teachers (meals, accommodation, transport, libraries) (5/95); educational support for underprivileged groups (wildfire victims, remote area inhabitants, refugees, non-Greek nationals, persons with special needs) (8/95); evaluation of private post-secondary education institutions, and professional rights granted to diploma-holders (4/95); higher education student transfers (5/95); non-competitive selection processes (direct contract awards, non-permanent staff) (2/95); payroll of clergy members (1/95); planned changes to school education curricula (7/95); planned changes to school education regulations (allowed absences, vaccination rules, timetables, student distinctions) (9/95); problems in private school operations (teacher working conditions, application of public education regulations) (4/95); problems in school operations (bribery, harassment, punishments, parent-teacher disputes) (9/95); responses to student and teacher mobilizations and demands (10/95); rules and calls for school teacher recruitments (11/95); rules for school teacher salary scales and career paths (6/95); and rules, scheduling, results and planned changes of the national exams for entering higher education (14/95). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead ministry.

2. Open access to data of the Ministry of Rural Development and Food

Main Objective

The published NAP mentions (p.9) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Rural Development and Food and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

*"Objectives: 1) Anonymisation and creation of new datasets.
2) Integration of new datasets.
3) Mobilisation of entities of the Ministry of Rural Development and Food for data publication.
4) Improvement of the quality of datasets.
5) Open data release decisions.
6) Upgrading of digital applications and provision of additional datasets."*

Milestones

The published NAP mentions (p.9-10) the milestones for this commitment as follows:

*"1) Anonymisation and creation of new datasets.
2) Integration of new datasets.
3) Mobilisation of entities of the Ministry of Rural Development and Food for data publication.
4) Improvement of the quality of datasets.
5) Open data release decisions
6) Upgrading of digital applications and provision of additional datasets."*

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.9-17.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	None

Commitment analysis

This commitment aims to publish data held by the Ministry of Rural Development and Food (MRDF), which includes datasets related to budget and fiscal reporting, awarding of tenders, operational approval decisions, livestock and plant data, veterinary information, and food and agricultural data.

The commitment is verifiable, as it clearly states that 49 datasets will be published in 2019. It is unclear however what datasets will be released in 2020, and is not clear about the process to be used to identify these datasets. According to the information collected from interviews with lead contacts, a part of these datasets was already published in previous release decisions and periodically updated. The commitment has sufficient relevance to the Access to Information OGP value, as it could lead the government to disclose more data (milestones 1, 2 and 5) and improve the quality of the information disclosed to the public (milestone 4).¹

Published data from the MRDF are spread across data.gov.gr (containing more than 130 open datasets published by MRDF as of May 2019)² and MRDF's own institutional website (where more than 80 open datasets have been made available as of May 2019)³. Much of the published information includes legislation, guidelines and forms, and lists of agricultural machinery and animals along with fishing vessels.

The official website of the MRDF⁴ contains one published report on the lead agency's open data policy and practice⁵ and a section on published data policies.⁶ The European Data Portal Open Data Maturity in Europe Report 2018⁷ lists open data practice of MRDF as "*a best practice given the good quality of datasets and robust implementation of open data policy*".⁸ The ministry's open data policy refers to procedures for ensuring the quality of the data published, whereas the published data policies section contains two additional guides on (a) confidentiality and personal data protection rules⁹ and (b) procedures for published data updates.¹⁰ The latter report sets definitions and rules for annual/multi-annual revisions and updates of published statistical data.

MRDF identified 180 data sets by MRDF and some 150 data sets by supervised entities related to agriculture, veterinarians, fishery and food as needing work done on anonymization before publishing. These datasets are apart from the ones identified in the action plan, which are anonymized already. Concerning milestone 3, supervised entities of the ministry already (prior to the action plan) started documenting and evaluating data for opening and so are expected to continue this on a yearly basis. MRDF clarified that the process for updating and improving the quality of the datasets (milestone 4) was already put in place prior to release of the action plan. MRDF clarified that it had made four open data release decisions before the action plan was adopted, and there had been 16 open data release decisions by MRDF-supervised entities. There were also around 30 e-services already made available by MRDF (milestone 6).

Concerning the rationale behind choosing datasets to open, MRDF mentioned that these choices are based on reasoning about how many stakeholders would benefit from opening each dataset but still stated that no relevant stakeholders outside the public sector have been involved in this process. MRDF mentioned, however, that there are some plans to include other stakeholders but mostly in the context of consultations for new regulations. Non-governmental stakeholder interviews¹¹ revealed that datasets like the ones included in this commitment on types of sheep or authorised agricultural products and producers may be far from the needs of policy areas and citizens and in fact seem to emanate instead from the internal bureaucratic organisation of data processes and files rather than from identified added-value needs of external stakeholders.

The potential impact of the commitment's milestones and of the commitment as a whole is difficult to assess and thus, despite the large amount of data to be released, it is coded as None.

It is unclear how the commitment will respond to the needs of citizens and the agricultural sector as per this commitment's objective. It should be noted, in this respect, that the open data demand side of the agricultural sector in Greece remains at its infancy. The Panhellenic Confederation of Unions of Agricultural Cooperatives website¹² lists no documents on open data and only a handful of documents on statistics; the website of the Greek Open Technologies alliance lists a few announcements for open data infrastructures for the agricultural sector,¹³ whereas the data.gov.gr space of MRDF lists only two followers.¹⁴ This, in the IRM researcher's view, is also an indication of a shortcoming, on behalf of MRDF, to make known its open data offerings to the agricultural sector and thus spur demand. It is noted, in this respect, that in an interview question about eventual dissemination plans, MRDF responded for internal (within the ministry) dissemination only. It is unclear how the activities of this commitment could improve or change current open data practices in the ministry or its agencies. At the same time, the milestones do not constitute any step forward beyond what is already mandatory according to legislation. The commitment could strive for some more important impact if it were to address publishing data on issues which clearly address problematic areas. For example, desktop research¹⁵ revealed a number of topical issues for this ministry's domain of responsibility, for which publishing open data could have value and could help to improve policies and processes. An indicative example is information relating to the policies, calls for applications and decisions on agricultural investment plans.

¹ The commitment meets some basic requirements for this value as (a) it pertains to government-held information; (b) it provides open access to information (milestone 5); (c) it is not restricted to data but pertains to all information (e.g. decisions); and (d) it promotes transparency of government decision making and carrying out of basic functions. Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (e) strive to meet the 5-Star model for Open Data design.

² Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/ypagr?q=&sort=metadata_modified+asc.

³ See webpages <http://www.minagric.gr/index.php/el/for-farmer-2/biologikgeorgiaktinotrofia/388-statistikabiologika> and <http://www.minagric.gr/index.php/el/xrisimewplirofories-2/arxeia-georg-pro/643-statistikabiologikaarxeio>.

⁴ <http://www.minagric.gr>, as mentioned in the official catalogue of the Hellenic Parliament, at <https://www.hellenicparliament.gr/en/news/links/ministries>.

⁵ Quality Policy for MRDF and Supervised Entities Statistics, MRDF, May 29, 2019, available at http://www.minagric.gr/images/stories/docs/ypoyrgeio/STATISTIKA/politikh_piotitas_ypaat.pdf.

⁶ <http://www.minagric.gr/index.php/el/the-ministry-2/statistik-es-tekmhrioshs/8469-politikes190619-2>.

⁷ Available at https://www.europeandataportal.eu/sites/default/files/edp_landscaping_insight_report_n4_2018.pdf.

⁸ Greece country factsheet, State of Play on Open Data 2018, available at

https://www.europeandataportal.eu/sites/default/files/country-factsheet_greece_2018.pdf, p.3.

⁹ Statistical Secrecy Policy for MRDF and Supervised Entities as Parts of the Greek Statistical System, available at http://www.minagric.gr/images/stories/docs/ypoyrgeio/STATISTIKA/politikh_statistikou_aporitou_ypaat.pdf.

¹⁰ MRDF Updates Policy, available at

http://www.minagric.gr/images/stories/docs/ypoyrgeio/STATISTIKA/politiki_anatheoriseon_ypaat.pdf.

¹¹ P. Georgiadis, academic expert on electronic governance and former public sector official (Secretary General for Information Systems and Electronic Governance), and S. Loucopoulos, CSO actor (VouliWatch).

¹² <https://www.neapaseges.gr/>

¹³ Cf. search query <https://opendata.ellak.gr/?s=%CE%B3%CE%B5%CF%89%CF%81%CE%B3%CE%AF%CE%B1> for the most recent ones.

¹⁴ <http://data.gov.gr/organization/about/ypagr>

¹⁵ Concerning Commitment 2 - Open access to data of the Ministry of Rural Development and Food, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/3p5jxPT>; <https://cutt.ly/Cp5JtN>; <https://cutt.ly/Np5JLN3>; <https://cutt.ly/9p5J02a>; and <https://cutt.ly/pp5KwK4>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): agricultural investment plans support (policies, calls, decisions) (9/31); farmer subsidies (policies, calls, decisions) (5/31); food products branding and certification (policies, decisions) (3/31); personnel recruitment (calls, deadlines, decisions) (3/31); planned policy changes and new policy decisions (5/31); and responses to farmer mobilizations and demands (6/31). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead

Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead Ministry.

3. Open access to data of the Ministry of Immigration Policy

Main Objective

The published NAP mentions (p.18) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Immigration Policy and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

*"Objectives: 1) Integration of new datasets
2) Open data release decisions."*

Milestones

The published NAP mentions (p.18) the milestones for this commitment as follows:

*"1) Integration of new datasets
2) Open data release decisions."*

Editorial Note: For the complete text of this commitment, please see Greece's action plan at <https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece-Action-Plan-2019-2021-EN.pdf>, p.18-19.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	Minor

Commitment analysis

Following the change in government after the 2019 general election (two months after the action plan was adopted), the Ministry of Immigration Policy (MIP) was dissolved and subsequently re-established as the Ministry of Immigration and Asylum (MIA).

Greece continues to feel the impacts of the migration and humanitarian crisis of 2015 which overwhelmed the capacity of public institutions to process and look after migrants and refugees while Greece was still adapting to the effects of the ongoing economic crisis. While Greece received over a million refugees and migrants in 2015 and 2016, the numbers have stabilised, and UNHCR estimates some 43,000 refugees and migrants are in Greece. The UNHCR identified that key priorities continue to be accommodation and support for refugees and migrants, particularly at-risk groups like women and children. Also, it identified the needs for a comprehensive strategy on integration of refugees and migrants and enabling them access to mainstream public services.¹

This commitment aims to publish data the ministry holds, including memoranda of understanding with other entities such as international organisations, legislation, and communications and press releases.

The commitment is verifiable but lacks specific or clear information about what criteria or datasets will be published other than the three types of data identified (memoranda of understanding, national legislation, press releases). It is unclear whether it will address any of the above issues outlined by UNHCR or other actor working in the sector or if it will open or improve decision-making. The commitment has sufficient relevance to the Access to Information OGP value because, if implemented fully, it will lead the government (milestones 1, 2)² to disclose documents such as memoranda of understanding between Greece and third countries concerning refugee and immigrants' reception and identification issues. Disclosure of this information is already required by Greek law on open public data by default,³ to the extent that personal data are not exposed and national security is not compromised.

Though no datasets from MIP or MIA are available on open data portals,⁴⁵ MIA currently publishes monthly statistical data on legal migration and asylum seekers in accommodation.⁶ The official websites of MIP⁷ and MIA⁸ have not been found to contain published reports on open data policy and practice.

The measures do not constitute any step forward beyond what is already mandatory to achieve according to legislation, even though it will lead to some limited-value information being made newly available to the public. It is unclear how implementing this commitment will help meet the objective of satisfying citizens' needs for development and participation or how it will address current challenges in Greece.

According to the above, and in the absence of feedback from the lead ministry, the potential impact of the commitment as a whole is coded as minor.⁹

There are suggestions from non-governmental actors about what information could be published to improve implementation of this commitment to meet the objective 'to contribute to the development and participation of citizens. Non-governmental stakeholder interviews¹⁰ mentioned that statistical data provided from all services under the Ministry (Appeals Authority, Asylum Service, General Secretariat of Migration and Asylum) would be of particularly high value. Other civil society representatives¹¹ stated that all migration data are of high value to stakeholders and mentioned priorities for data related to social exclusion and ensuring equal treatment of all citizens. Yet another civil society stakeholder¹² stressed the need for transparency in all information relevant to the handling of refugee and migrant flows. At the same time, further desktop research¹³ revealed a number of topical issues for this ministry's domain of responsibility, for which publishing open data would have a value and could help to improve policies and processes such as audit information on EU funding, information on the management of temporary refugee settlements, and refugee and immigrant living conditions.

¹UNHCR <https://reporting.unhcr.org/node/14851?y=2018#year> Last accessed 11/09/2020

² The commitment meets some basic requirements for this value as (a) it pertains to government-held information; (b) it provides open access to information (milestone 2); and (c) it is not restricted to data but pertains to all information (e.g. memoranda of understanding). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (d) promote transparency of government decision making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

³ Law 4305/2014, Official Government Gazette No.A237/31.10.2014, online available at http://www.et.gr/ids-nph/search/pdfViewerForm.html?args=5C7QrtC22wEc63YDhn5AeXdtvSoClrL8oeKAuTKOuiV5MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKI3nP8NxdnJ5r9cmWyjWelDvWS_I8kAEhATUkjb0xILldQI63nV9K--td6SlubMfH2r_a2DXjO6MjnF-5f9_LW7pRMszX0fGIIINVmMlh.

⁴ Data sets searched through webpage <http://data.gov.gr/organization>.

⁵ Data sets searched through webpage <http://geodata.gov.gr/organization>.

⁶ See webpages <http://www.immigration.gov.gr/web/guest/miniaia-statistika-stoixeia> and <http://www.immigration.gov.gr/web/guest/statistika-stegasis>.

⁷ <https://www.migration.gov.gr>, as mentioned in the official catalogue of the General Secretariat of Legal and Parliamentary Issues, at https://gslegal.gov.gr/?page_id=138.

⁸ <http://www.immigration.gov.gr/>, as mentioned in the official Greek Government website, at <https://government.gov.gr/category/%CF%80%CE%BF%CE%B9%CE%BF%CF%83/ipourgio-metanastefsis/>.

⁹ As these codings are defined in the “IRM Procedures Manual” (OGP), available at <https://www.opengovpartnership.org/documents/irm-procedures-manual>, p.64-66.

¹⁰ N.Vlaikidis, from UNHCR Office in Athens.

¹¹ E.Thanou, a CSO actor representing Doctors of the World, and T.Vratimos representing GIVMED.

¹² A.Veizis, representing Doctors without Borders.

¹³ Concerning Commitment 3 - Open access to data of the Ministry of Immigration Policy, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/UaCdOCH>; <https://cutt.ly/9aCdS0F>; <https://cutt.ly/oaCdHqc>; <https://cutt.ly/taCdZzL>; and <https://cutt.ly/UaCf35u>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry’s domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): asylum requests (processes, decisions, appeals) (5/29); auditing of EU funds management and public expenditure for refugee and immigrant reception and support (6/29); management of refugee settlements (7/29); personnel recruitment (calls, terms, deadlines, decisions) (4/29); refugee and immigrant living conditions (6/29); and refugees sexual trafficking (incidents, investigation outcomes) (1/29). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry’s domain of responsibility; (b) meet the public’s interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead Ministry.

4. Open access to data of the Ministry of National Defence

Main Objective

The published NAP mentions (p.20) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of National Defence and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

*"Objectives: 1) Anonymisation and creation of new datasets
2) Integration of new datasets
3) Mobilisation of entities of the Ministry of National Defence for data publication
4) Improvement of the quality of datasets
5) Open data release decisions."*

Milestones

The published NAP mentions (p.20-21) the milestones for this commitment as follows:

*"1) Anonymisation and creation of new datasets
2) Integration of new datasets.
3) Mobilisation of entities of the Ministry of National Defence for data publication
4) Improvement of the quality of datasets
5) Open data release decisions."*

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.20-21.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	Minor

Commitment analysis

This commitment aims to publish data held by the Ministry of National Defence (MND).

The commitment is considered verifiable because it specifies that 100 datasets will be published in 2019 but does not clarify any specific details or criteria to determine the kind of data that may be considered for publishing. The commitment has sufficient relevance to the Access to Information OGP value because, if implemented fully, it will lead the government to disclose more information (milestones 1, 2 and 5), although it is not clear on which topics or how the data will be chosen.

As of May 2019, no datasets nor open data policies had been published by the Ministry of National Defence (MND) on open data portals nor on its own website.¹²³ The MND confirmed that no anonymised datasets were published prior to release of the action plan, no such datasets existed already upon release of the action plan, there were no awareness meetings and uptake of open data efforts before the action plan, no data quality concepts existed prior to release of the action plan and no data release decisions already existed upon release of the action plan.

The commitment, if fully implemented, is expected to make available for reuse some datasets curated by the lead agency and supervised entities. The relative significance of these datasets is unclear, and consequently, these improvements cannot be safely expected to respond to the needs of citizens for development and participation, as per the commitment objective.

Concerning the rationale behind choosing datasets to open, MND mentioned that these choices are based on what is perceived by the agency as interesting to the citizens, while taking into consideration national security and national defence issues, and stated that no relevant stakeholders outside the public sector are involved in this process. In terms of government practice, it is unclear what impact it may have, as the commitment does not move beyond what is already mandatory according to legislation; thus, it cannot be considered ambitious.

The potential impact of all the commitment's milestones and of the commitment as a whole is coded as minor.⁴ While the commitment in many ways is no different from other commitments in this action plan, it will introduce a step change in that the MND will publish datasets for the first time. This, coupled with the quality check and standardisation that will be needed for internal data-generating processes, and with a level of public-facing transparency that will be created, and which it will be difficult to take back once established, can be expected to make the ministry's internal process quality and policies better subjected to public oversight. However, the lack of clarity around what datasets or processes may change means that it is not possible to code the potential impact as more than minor.

Any changes to planned implementation would benefit from considering datasets to open according to citizens' priorities and by bringing CSOs and other external stakeholders into the process. That said, it is noted that interviews have not revealed specific high-value datasets that they would like to see published through this commitment's implementation. Desktop research⁵ however revealed a number of topical issues for this ministry's domain of responsibility for which publishing open data would have value and could help to improve policies and processes. An indicative example is publishing information on anti-corruption auditing of military procurement contracts.

¹ Data sets searched through webpage <http://data.gov.gr/organization>.

² Data sets searched through webpage <http://geodata.gov.gr/organization>.

³ <http://www.mod.mil.gr>, as mentioned in the official catalogue of the Hellenic Parliament, at <https://www.hellenicparliament.gr/en/news/links/ministries>.

⁴ As these codings are defined in the "IRM Procedures Manual" (OGP), available at <https://www.opengovpartnership.org/documents/irm-procedures-manual>, p. 64-66.

⁵ Concerning Commitment 4 - Open access to data of the Ministry of National Defense, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/vaChUUo>; <https://cutt.ly/YaChFyk>; <https://cutt.ly/XaChZmL>; <https://cutt.ly/7aChM2m>; and <https://cutt.ly/8aCh7hR>. The headlines harvested

have been thematically encoded and clustered for topical issues concerning the lead ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): anti-corruption auditing of military procurement contracts (5/25); auditing on non-military public expenditure (2/25); management of military real estate property (policies, decisions) (4/25); military accidents (incidents, investigation outcomes) (1/25); non-competitive selection procedures (non-permanent civilian staff) (1/25); personnel promotion (policies, calls, procedures, decisions) (1/25); personnel recruitment (policies, calls, procedures, decisions) (5/25); questioned disciplinary measures (3/25); and social work delivered by military personnel (3/25). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public and could bring forward a positive impact in improving the relevant processes and policies of the lead ministry.

5. Open access to data of the Ministry of the Interior

Main Objective

The published NAP mentions (p.22) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of the Interior and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

*"Objectives: 1) Anonymisation and creation of new datasets
2) Integration of new datasets
3) Mobilisation of entities of the Ministry of the Interior for data publication
4) Improvement of the quality of datasets
5) Open data release decisions
6) Upgrading of digital applications and provision of additional datasets."*

Milestones

The published NAP mentions (p. 22-23) the milestones for this commitment as follows:

*"1) Anonymisation and creation of new datasets
2) Integration of new datasets
3) Mobilisation of entities of the Ministry of the Interior for data publication
4) Improvement of the quality of datasets
5) Open data release decisions
6) Upgrading of digital applications and provision of additional datasets."*

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.22-23.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	Minor

Commitment analysis

This commitment aims to publish and improve the quality of election results data, expenses of election candidates, financial data of local authorities, data on the state administrative structure, and data related to the acquisition, rejection and withdrawal of Greek citizenship that the Ministry of Interior (MI) holds.

The commitment is verifiable because it outlines the expected number of datasets to be published in 2019. The commitment has sufficient relevance to the Access to Information OGP value because, if implemented fully, it will lead the government to disclose updated information (milestones 1, 2 and 5) and could improve the quality of the information disclosed to the public (milestone 4).¹

The MI had published 20 datasets across open data portals as of May 2019²³ and more than 40 open datasets on its own website as of May 2019,⁴ including a report on MI's open data policy and practice.⁵ Some of these datasets include high-level data on crime, forest fires, and elections information, such as lists of local councilors and number of voters per constituency. The MI has explained in interviews that all datasets available prior to release of the action plan are by definition anonymised. Datasets that have been published prior to release of the fourth action plan have concerned elections, organisation of local administrations and citizenship applications. The MI has also stated that supervised entities of MI have already been publishing datasets as obliged by law and have met this requirement and the milestones. The MI stated that not all published data are machine readable.

The potential impact of the commitment is coded as having minor impact.⁶ It is expected to make available for reuse some more datasets curated by the lead ministry and supervised entities. The ministry has confirmed that although some datasets have already been published and do not constitute new datasets, it expects to improve the quality of the datasets available for reuse by publishing in Excel as well as PDF formats and making it easier to access the information directly via the ministry website.⁷ The publication of financial data of local authorities in reusable formats will enable local civil society and citizens to engage in challenging financial spending, proposing spending or policy changes, and enable a greater evidence base for making arguments on such proposals. Concerning the rationale behind choosing datasets to open, MI mentioned that these choices are based on what is perceived by the ministry as bringing about more transparency and responding better to citizen interests and did not mention involving relevant stakeholders outside the public sector in this process. Desk research⁸ revealed a number of topical issues for this ministry's domain of responsibility for which publishing open data may have a value and could help to improve policies and processes. An indicative example is information on policies and decisions related to citizen naturalisation which will allow for these decisions to be scrutinised and challenged where necessary.

Any changes to planned implementation could include selecting datasets to open according to citizens' priorities and/or by bringing CSOs and other stakeholders into the process of improving and selecting datasets to publish.

¹The commitment meets some basic requirements for this value as (a) it pertains to government-held information; and (b) it provides open access to information (milestone 4). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (c) not be restricted to data but pertain to all information; (d) promote transparency of government decision-making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

²Datasets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/types?q=&sort=metadata_modified+asc.

³Data sets searched through webpage <http://geodata.gov.gr/organization> and query http://geodata.gov.gr/organization/types?q=&sort=metadata_modified+asc.

⁴ See webpage <https://www.ypes.gr/category/dioikitiki-anasygkrotisi-anoichta-dedomena/>.

⁵ Annual Report on the Availability and Reuse of Open Data in Application of Article 12C, Law 4305/2014 (in Greek), published on April 21, 2016, available at <https://www.ypes.gr/etisia-ekthesi-gia-ti-diathesi-kai-peraitero-chrisi-ton-anoichton-dedomenon-se-efarmogi-toy-arth-12g-toy-n-4305-2014/>.

⁶ As these codings are defined in the “IRM Procedures Manual” (OGP), available at <https://www.opengovpartnership.org/documents/irm-procedures-manual>, p. 64-66.

⁷ The Ministry of Interior confirmed this in feedback during the prepublication period.

⁸ Concerning Commitment 5 - Open access to data of the Ministry of the Interior, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/3aCRVAF>; <https://cutt.ly/1aCR322>; <https://cutt.ly/8aCTwWa>; <https://cutt.ly/waCToft>; and <https://cutt.ly/1aCThU4>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry’s domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): auditing of election costs (2/29); citizen naturalization (policies, decisions) (4/29); illegal constructions demolition (policies, decisions) (2/29); non-competitive selection processes (non-permanent staff) (2/29); public servants recruitment (policies, calls, decisions) (6/29); subsidies and debts to local administration (policies, decisions) (7/29); support for low-income families (policies, decisions) (2/29); and support for wildfire victims (policies, decisions) (4/29). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry’s domain of responsibility; (b) meet the public’s interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public and could bring forward a positive impact in improving the relevant processes and policies of the lead ministry.

6. Open access to data of the Ministry of Administrative Reconstruction

Main Objective

The published NAP mentions (p. 24) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Administrative Reconstruction and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

"Objectives: 1) Creation of a new open data site with advanced functionalities, screening, scoring and communication mechanisms with users

2) Integration of new datasets

3) Mobilisation of entities of the Ministry of Administrative Reconstruction for data publication

4) Improvement of the quality of datasets

5) Open data release decisions

6) Upgrading of digital applications and provision of additional datasets

7) Creation of new datasets, statistics and reports

8) Further expansion of the open data ecosystem by involving civil society

9) Integration of information of previous phases of the civil servant mobility system."

Milestones

The published NAP mentions (p. 24-25) the milestones for this commitment as follows:

"1) Creation of a new open data site with advanced functionalities, screening, scoring and communication mechanisms with users

2) Integration of new datasets

3) Mobilisation of entities of the Ministry of Administrative Reconstruction for data publication

4) Improvement of the quality of datasets

5) Open data release decisions

6) Upgrading of digital applications and provision of additional datasets

7) Creation of new datasets, statistics and reports

8) Further expansion of the open data ecosystem by involving civil society

9) Integration of information of previous phases of the civil servant mobility system."

Editorial Note: For the complete text of this commitment, please see Greece's action plan at <https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece-Action-Plan-2019-2021-EN.pdf>, p.24-25.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	Minor

Commitment analysis

This commitment aims to publish data held by the Ministry of Administrative Reconstruction (MAR) on a new open data website and engage with civil society on open data topics. Given that MAR was dissolved following Greece's government change in 2019 and its portfolio has been transferred mainly to the Ministry of Digital Governance (MDG) with some activities transferred to the Ministry of Interior (MI), the lead ministries for this commitment are currently MDG and MI.

The commitment, if fully implemented, is expected to make available for reuse some more datasets curated by the lead agency and supervised entities and improve the quality of the datasets available for reuse. However, given that the commitment does not make clear how this aim will be achieved, it is not clear that it will meet the commitment objective of responding to the development and participation needs of citizens. Additionally, the commitment is expected to create a new data portal whose functional design will consider the needs of users and allow interaction and involve civil society in the expansion of the public open data ecosystem. The relative significance of these improvements is unclear due to insufficient specificity of the commitment text and milestone language. It is also unclear how far this commitment will change government practice with regard to publishing open data or interacting with civil society for this commitment specifically and in general.

The commitment's text, as it reads in the action plan, is verifiable but does not contain any detail or specificity about the milestones in relation to the Ministry of Administrative Reconstruction. The commitment has sufficient relevance to the Access to Information OGP value, as it seeks to disclose more information and improve the quality of the information disclosed to the public.¹ This is one of the few commitments in the action plan that comes somewhat close to civic participation. Milestone 8 can be expected to create opportunities for civil society to be involved in further expansion of the open data ecosystem, but it is unclear what the ecosystem is, how civil society involvement is meant to operate, and whether this involvement is meant to influence decision-making or not. Interview responses provided by MAR² mentioned some ideas about working together with civil society and private sector organisations to inform public decisions but no concrete plans to deploy a formal public influence instrument.³

Data.gov.gr contains more than 110 open datasets MAR (as former lead ministry) had published as of May 2019.⁴ MAR's official website (as former lead institution)⁵ contains a published report on MAR's overall electronic government strategy.⁶ This report presented open availability of public information as one out of 10 strategic objectives, without however going into implementation guidelines. Of the new lead agencies for this commitment,⁷ only the website of MI had published its open data policy and practice as of 2016.⁸ This same report also provides an account of open data progress following publication of the relevant law in 2014 and an action plan for 2016.

MDG representatives explained that the data.gov.gr platform includes only basic communication facilities such as contact form, advanced users' room and a satisfaction questionnaire. MDG did not provide a specific rationale for not enhancing the existing data portal. MDG explained that meetings have taken place since the entry into force of Law 43.05/2014, which formed the catalyst for mobilisation of resources to publish data prior to the publication of the action plan.

MDG explained that the concept of data quality as machine readability of published datasets was already met by most of the datasets published prior to the fourth action plan and explained that MAR, as the former lead agency of this commitment, had issued one open data release decision prior to publication of the fourth action plan, whereas there were around 180 applications available upon publication of the fourth action plan. MDG did not provide further details on these topics. In terms of civil society involvement in the expansion of the open data ecosystem, MDG explained that prior to publication of the fourth action plan, it had held some discussions with the Federation of Greek Industries. MDG, however, did not mention any plans about continuing these discussions with FGI or other stakeholders.

With respect to the integration of previous phases of the civil servant mobility system, the Ministry of Interior, which inherited this part of the former MAR portfolio, did not provide information on this issue.

In terms of ambition, milestone 1 on a new, more interactive open data site, milestone 6 on web services, and milestone 8 on involvement of civil society constitute an ambition beyond the usual activities of the institution and broader public sector, as institutions do not often update the ability to interact with their websites or web services or involve civil society in decision-making. The remaining milestones and activities do not depart from current practice and, at the same time, do not constitute any step forward beyond what is already mandatory to achieve according to legislation; thus, they are not considered ambitious.

To assess potential impact, some of the feedback provided by the lead agency of this commitment needs to be considered. MDG did not mention taking up some specific experience from implementation of the previous action plan in the design of this commitment or integrating into this commitment feedback from the action plan co-design process given that there were no relevant comments submitted in the online consultation. Concerning the rationale behind choosing datasets to open, MDG did not mention involvement of relevant stakeholders outside the public sector or continuation of relevant discussions with FGI but did mention that datasets with high added value as perceived by MDG would be a factor.

This commitment is coded as having minor potential impact because of the new open data website that will be created to serve the needs of open data users. The commitment also seeks to work with civil society to improve the open data ecosystem overall (albeit remaining imprecise about what this will entail) and will ultimately lead to newly created and better-quality datasets being available to the public. The lack of specificity about how the commitment could be implemented restricts the assessment of the potential impact.

Any improvements to planned implementation need to consider selecting datasets that are relevant to data users and external stakeholders. Non-governmental stakeholder interviews did not reveal specific high-value datasets that they would like to see published through this commitment's implementation. Further desktop research⁹ revealed however that public officials' performance, the recruitment process, and salaries were topical issues and that publishing open data related to these could have value in informing the public and could help to improve government processes.

¹The commitment meets some basic requirements for this value as (a) it pertains to government-held information (milestones 7 and 9); and (b) it provides open access to information (milestone 5). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (c) not be restricted to data but pertain to all information; (d) promote transparency of government decision making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

² Email responses to interview questions provided on 15 May 2020, by Mr. A.Dimitriou and Mr. A.Sklapanis, MAR contacts referred to by lead contact Ms.A.Balou.

³ More details on how this will be done, however, are not provided in the commitment text.

⁴ Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/ydmed?q=&sort=metadata_modified+asc.

⁵<http://www.ydmed.gov.gr>, as mentioned in the official catalogue of the OpenGov.gr platform, at <http://www.opengov.gr/minreform/>.

⁶ Greek Strategy for Electronic Governance 2014-2020 (in Greek), published on 15 April, 2014, available at http://www.ydmed.gov.gr/wp-content/uploads/20140415_egov_strategy.pdf.

⁷<https://www.ypes.gr>, for MI, and <https://mindigital.gr/>, for MDG, as mentioned in the official catalogue of the Hellenic Parliament, at <https://www.hellenicparliament.gr/en/news/links/ministries>.

⁸ Annual Report on the Availability and Reuse of Open Data in Application of Article 12C, Law 4305/2014 (in Greek), published on April 21, 2016, available at <https://www.ypes.gr/etisia-ekthesi-gia-ti-diathesi-kai-peraitero-chrisi-ton-anoichton-dedomenon-se-efarmogi-toy-arth-12g-toy-n-4305-2014/>.

⁹ Concerning Commitment 6 - Open access to data of the Ministry of Administrative Reconstruction, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/2aCY2d2>; <https://cutt.ly/XaCY5Ig>; <https://cutt.ly/SaCUyYW>; <https://cutt.ly/RaCUdHy>; and <https://cutt.ly/GaCUvlf>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): non-competitive selection processes (non-permanent staff) (2/27); public sector salary costs (1/27); public servants leaves (policies, decisions) (4/27); public servants mobility (policies, calls, decisions) (3/27); public servants performance evaluation (policies, decisions) (2/27); public servants recruitment (policies, calls, decisions) (10/27); and public service delivery (policies, channels, procedures) (5/27). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead Ministry.

7. Open access to data of the Ministry of Economy and Development

Main Objective

The published NAP mentions (p.26) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Economy and Development and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

"Objectives: 1) Integration of new datasets

2) Mobilisation of entities of the Ministry of Economy and Development for data publication

3) Improvement of the quality of datasets

4) Open data release decisions

5) Upgrading of digital applications and provision of additional datasets

6) Datasets, applications and visualisations of data of procurement, contracts, public works and services."

Milestones

The published NAP mentions (p.26-27) the milestones for this commitment as follows:

"1) Integration of new datasets

2) Mobilisation of entities of the Ministry of Economy and Development for data publication

3) Improvement of the quality of datasets

4) Open data release decisions

5) Upgrading of digital applications and provision of additional datasets

6) Datasets, applications and visualisations of data of procurement, contracts, public works and services."

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.26-28.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	Minor

Commitment analysis

This commitment aims to publish statistical and economic data held by the Ministry of Economy and Development and to improve the quality of datasets, upgrade digital applications and produce visualisations of data on procurement, contracts, public works and services.

The commitment has sufficient relevance to the Access to Information OGP value since, if implemented fully, it will lead the Government to disclose more information.¹ It is verifiable, but it is not specific about the kinds of visualisations or digital applications, their purpose, the ways in which data quality could be improved, or the aims or criteria behind the datasets to be published.

The Ministry of Economy and Development (MED) has published more than 30 open data sets as of May 2019 on the data.gov.gr website², and over 150 open data sets have been made available as of May 2019 on the MED website³. The data published on the MED website include fuel and refinery prices, food and consumer goods prices, and steel and aluminium imports. Some of these datasets (for instance, fuel prices, consumer goods prices) are also published on the data.gov.gr website.

Although one CSO actor⁴ expressed confidence that datasets concerning the topic of economy will have high value for stakeholders, they did not specify which datasets were of high value. In this particular case, this actor is running a solidarity network for redistributing spare medications to low-income or no-income patients and might have benefitted from open data on high consumer prices by region, which could be made available by MED.

The commitment, if fully implemented, is expected to (a) make available for reuse some more datasets curated by the lead agency and supervised entities and (b) improve the quality of the datasets available for reuse. The potential impact of the commitment is coded as minor because despite aiming to make more datasets available to the public, with better-quality data and improved visualization and digital applications, it is not clear that this will change, improve or make any difference to current government practice beyond what is already mandatory, or resolve an identified problem. Nor is it clear whether the improvements will respond to the needs of citizens for development and participation as expressed in the commitment's objectives. MDI did not mention using any experience from implementation of the previous action plan in the design of this commitment or integrating into this commitment feedback from the action plan co-design process. Concerning the rationale behind choosing datasets to open, MDI mentioned perceived usefulness by internal ministry stakeholders and stated that no relevant stakeholders outside the public sector were involved in this process.

The commitment could benefit from greater engagement with citizens, data users, CSOs and other external stakeholders into the process of determining which datasets to publish. For instance, a CSO actor⁵ explicitly mentioned information regarding consumer protection, which is almost impossible to obtain from the public sector, whereas the text of this commitment mentions integrating consumer protection data from a proprietary MED website into new open datasets, but without providing further details. The ministry's open data plans could have clearer links to public needs if it had been cocreated with civil society. At the same time, further desktop research⁶ confirmed the interest in some datasets mentioned in the commitment (e.g. the datasets on fuel prices) and revealed a number of topical issues for this ministry's domain of responsibility, for which publishing open data would have a value and could help to improve policies and processes. An indicative example is information on the policies, subsidies, projects, calls and decisions related to new state investments.

¹ The commitment meets some basic requirements for this value as (a) it pertains to government-held information; and (b) it provides open access to information (milestone 4). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (c) not be restricted to data but pertain to all information; (d)

promote transparency of government decision making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

² Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/ytoypreio-oikonomiae-anatttyehe-kai-toyptemoy?q=&sort=metadata_modified+asc.

³ See webpages <http://www.mindev.gov.gr/open-data/#1586179665478-2d0648a6-a761>, <http://www.mindev.gov.gr/category/ektelesi-proipologismou/>, <http://www.mindev.gov.gr/%cf%84%ce%b9%ce%bc%ce%ad%cf%82-%cf%80%cf%81%ce%bf%cf%8a%cf%8c%ce%bd%cf%84%cf%89%ce%bd/> and <http://www.mindev.gov.gr/category/prostima-dieppy/>.

⁴T.Vratimos, representing GIVMED.

⁵E.Alevritou, representing E.K.PI.ZO.

⁶ Concerning Commitment 7 - Open access to data of the Ministry of Economy and Development, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/MaClkBH>; <https://cutt.ly/vaClQtE>; <https://cutt.ly/ZaClOiN>; <https://cutt.ly/WaClHrX>; and <https://cutt.ly/faClMwP>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): fuel prices (policies, decisions, information) (2/39); investigation outcomes of financial scandals (5/39); investments with environmental impact (policies, decisions) (2/39); investments with impact on monuments and antiquities (policies, decisions) (1/39); new investments (policies, subsidies, projects, calls, decisions) (20/39); non-competitive selection processes (direct awards, non-permanent staff) (2/39); personnel salaries and recruitment policies (3/39); policies for businesses (2/39); policies for local administrations (1/39); and policies for overdebted families (1/39). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead Ministry.

8. Open access to data of the National Centre for Public Administration and Local Government

Main Objective

The published NAP mentions (p.29) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the National Centre for Public Administration and Local Government and will be made available for re-use in order to contribute to the development and participation of citizens."

*"Objectives: 1) Study on the Implementation of the Digital Repository
2) Implementation of a platform of a Digital Repository for research and studies of the public sector
3) Study on optimisation of the online consultation process
4) Integration of new datasets."*

Milestones

The published NAP mentions (p.29) the milestones for this commitment as follows:

*"1) Study on the Implementation of the Digital Repository
2) Implementation of a platform of a Digital Repository for research and studies of the public sector
3) Study on optimisation of the online consultation process
4) Integration of new datasets."*

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.29.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	Minor

Commitment analysis

The commitment aims to implement a digital repository of research and studies performed within NCPALG and the public sector and to conduct a study on optimisation of the online consultation process on the OpenGov.gr platform. It is relevant to the Access to Information OGP value because the repository will aid publication of data and information even if it is unclear exactly what information will be published.¹ Neither the commitment text nor the feedback the lead agency² provided gives a clear indication of intentions to act upon the

proposed study on online consultation processes, so it is not relevant to the OGP Civic Participation value.

There is little evidence of datasets having been published by the National Centre for Public Administration and Local Government (NCPALG). The IRM found that data.gov.gr contains more than 20 open datasets published by NCPALG as of May 2019.³ The existing digital repository of NCPALG⁴ contains some 500 items (including 40 studies on subjects like the impact of the economic crisis on the family, farming, violence against women;⁵ 130 educational resources on subjects like tourist sector economic development and human rights;⁶ and 330 digital analytical and academic studies on different aspects of the public administration, political system and economy⁷). Download statistics provided for educational resources amount to some 4,000–7,000 downloads for the most popular ones on topics such as gender issues and health management.

In interviews with NCPALG, the ministry explained that no studies for implementation of digital repositories already existed upon release of the action plan. NCPALG representatives explained that a digital repository for research and studies of the public sector has operated since 2012, and this repository is to be migrated to the new one once the latter is operational. The IRM did not identify reports on repository quality and user satisfaction and uptake. NCPALG mentioned the importance of datasets in terms of the institutional profile of the agency and did not mention relevant stakeholders outside the public sector being involved in the process of choosing datasets to open.

Previous reports on evaluation and/or optimisation of the online consultation process have not been identified. Still, usage statistics publicly available for the opengov.gr platform⁸ report some 900 consultations and 240,000 comments as of the time of writing (July 2020), and the platform is regularly used for online consultation of new law drafts. NCPALG commented that the study (milestone 3) may address any major improvements of the online consultation mechanisms that could be affected through implementation of this commitment along with plans to increase participation in the online consultations and enhance feedback mechanisms and responsiveness.

With respect to milestone 4, NCPALG provided a list of some 220 datasets cleared for release through a decision prior to publication of the action plan. It is noted that this list was not formulated with CSO involvement and does not necessarily reflect topic areas which would be highly sought by civil society. The action is ambitious in seeking to publish the 220 datasets, but it appears that the datasets have already been determined and will not entail any further influence from civil society or public participation in implementation.

If completed, the commitment could have a minor impact. It is expected that new data will enter the public domain for the first time, and in theory, this could allow the public sector to better inform policymaking from previous research and studies. NCPALG mentioned that the previous action plan highlighted the need to define Creative Commons licenses, so these new data are expected to be available in open formats. That said, it is unclear whether actions following the study and implementation of the digital repository will lead to a refreshed website or a more substantial change in the way the repository works. Additionally, according to NCPALG's feedback, following the 2019 reform of ministry portfolios,⁹ it is not clear yet which agency will be responsible for carrying out the study.

As next steps, any changes to planned implementation could consider selecting datasets to open according to citizens' priorities. That said, non-governmental stakeholder interviews have not revealed specific high-value datasets they would like to see published through this commitment's implementation. At the same time, further desktop research¹⁰ revealed a number of topical issues for this ministry's domain of responsibility for which publishing open data would have a value and could help to improve policies and processes. An indicative example is information on alumni career paths and professional status.

¹The commitment meets some basic requirements for this value as (a) it pertains to government-held information (milestone 2); and (b) it is not restricted to data but pertains to all information (milestone 2). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (c) provide open access to information; (d) promote transparency of government decision making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

² Email response to interview questions provided on May 6, 2020, by G.Chalkias, referred to by the NCPALG lead contact.

³Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/ekdd?q=&sort=metadata_modified+asc.

⁴ Available at <http://resources.ekdd.gr/knowledge/>.

⁵ Available at http://resources.ekdd.gr/knowledge/index.php?option=com_php&Itemid=17.

⁶ Available at <http://resources.ekdd.gr/gnosis/index.php>.

⁷ Available at <https://repositoryesdda.ekdd.gr/>.

⁸ Available at <http://www.opengov.gr/home/announce-statistics>.

⁹ Law 4622/2019, Official Government Gazette No.A' 133/07.08.2019, online available at http://www.et.gr/docs-nph/search/pdfViewerForm.html?args=5C7QrtC22wFqnM3eAbjzrXdtvSoClrL8NXGWS3cU8Kt5MXD0LzOTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKI3nP8NxdnJ5r9cmWyjWelDvWWS_18kAEhATUkjb0x1LldQ163nV9K--td6SluRmo9qrjUJMQq2O30kMOMg7ZNfjn86oicoBs0fePDGfg.

¹⁰ Concerning Commitment 8 - Open access to data of the National Centre for Public Administration and Local Government, news headlines concerning the lead Centre have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/EaCOXF1>; <https://cutt.ly/7aCO2NH>; <https://cutt.ly/laCPqlx>; <https://cutt.ly/taCPoJU>; and <https://cutt.ly/paCPkEZ>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead centre's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): alumni career paths and professional status (2/12); personnel recruitment calls (terms, deadlines) (4/12); student recruitment calls (terms, deadlines) (4/12); and vocational training programs (calls, terms, deadlines) (2/12). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead centre's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead centre.

9. Open access to data of the Ministry of Justice, Transparency and Human Rights

Main Objective

The published NAP mentions (p.30) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Justice, Transparency and Human Rights and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

*"Objectives: 1) Anonymisation and creation of new datasets
2) Integration of new datasets
3) Mobilisation of entities of the Ministry of Justice, Transparency and Human Rights for data publication.
4) Improvement of the quality of datasets
5) Open data release decisions
6) Upgrading of digital applications and provision of additional datasets."*

Milestones

The published NAP mentions (p.30-31) the milestones for this commitment as follows:

*"1) Anonymisation and creation of new datasets
2) Integration of new datasets
3) Mobilisation of entities of the Ministry of Justice, Transparency and Human Rights for data publication.
4) Improvement of the quality of datasets
5) Open data release decisions
6) Upgrading of digital applications and provision of additional datasets."*

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.30-32.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	None

Commitment analysis

This commitment aims to publish new information into the public domain on issues related to crime statistics, lawyer and notary competition results; presidential pardons; and some economic

data. The commitment is considered verifiable but is unclear about the detail and format of these datasets.

The commitment is relevant to the Access to Information OGP value because, if implemented fully, it will lead the government to disclose more information (milestones 1, 2, 5 and 6) and improve the quality of the information disclosed to the public (milestone 4).¹

The Ministry of Justice, Transparency and Human Rights has published more than 20 open datasets on Data.gov.gr as of May 2019,² such as the simplification of administrative procedures and the decrees establishing detention centres.

The milestones will not lead to changes in the way government operates or publishes data beyond what is already mandatory according to legislation.

To assess potential impact, MJ did not mention taking up relevant experience from implementation of the previous action plan in the design of this commitment or integrating feedback from the action plan co-design process into this commitment. Additionally, MJ noted that in the context of the fourth action plan co-creation process, the process lead agency had not granted the ministry sufficient information and time for formulating commitments, contrary to what the case was in the context of the third action plan co-creation process. Concerning the rationale behind choosing datasets to open, MJ did not provide specific information and did not mention relevant stakeholders outside the public sector to be involved in this process. In this respect, the potential impact of the commitment is coded as None.³

Any changes to planned implementation could consider selecting datasets to open according to citizens' priorities and could bring CSOs and other non-government stakeholders into the process of setting priorities. Civil society stakeholders during interviews did not provide any specific views on the value of these or other ministry datasets. Desktop research⁴ revealed a number of topical issues for this ministry's domain of responsibility for which publishing open data could have value and help to improve policies and processes. An indicative example is information such as policies, incidents, decisions and appeals on detainment conditions or information around personnel recruitment such as calls for applications, deadlines and decisions.

¹ The commitment meets some basic requirements for this value as (a) it pertains to government-held information; and (b) it provides open access to information (milestone 5). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (c) not be restricted to data but pertain to all information; (d) promote transparency of government decision making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

² Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/moj?q=&sort=metadata_modified+asc.

³ As these codings are defined in the "IRM Procedures Manual" (OGP), available at <https://www.opengovpartnership.org/documents/irm-procedures-manual>, p. 64-66.

⁴ Concerning Commitment 9 – Open access to data of the Ministry of Justice, Transparency and Human Rights, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/SaCAAWg>; <https://cutt.ly/6aCAZTH>; <https://cutt.ly/0aCA2fU>; <https://cutt.ly/JaCA63e>; and <https://cutt.ly/EaCSi3l>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): detainment conditions (policies, incidents, decisions, protests, appeals) (10/40); non-competitive selection processes (direct contract awards, non-permanent staff) (2/40); personnel recruitment (calls, terms,

deadlines, decisions) (11/40); planned changes to the judicial and penitentiary system (4/40); prisoner escape and in-prison corruption incidents (7/40); and unjustified stringency / unjustified leniency (incidents, policy changes) (6/40). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead ministry.

10. Open access to data of the Ministry of Environment and Energy

Main Objective

The published NAP mentions (p.33) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Environment and Energy and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

*"Objectives: 1. A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Environment and Energy and will be made available for re-use in order to contribute to the development and participation of citizens.
2. Investigation of the possibility of harvesting the data of the Ministry of Environment and Energy into data.gov.gr
3. Integration of new datasets and web services
4. Improvement of the quality of datasets
5. Open data release decisions."*

Milestones

The published NAP mentions (p. 33-34) the milestones for this commitment as follows:

*"1) Creation of new datasets
2) Investigation of the possibility of harvesting our data in data.gov.gr (creation of a compatible API)
3) Integration of new datasets and web services
4) Improvement of the quality of datasets
5) Open data release decisions."*

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.33-34.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	None

Commitment analysis

This commitment seeks to publish new datasets held by the Ministry of Environment and Energy, develop an API which would help make the data available on data.gov.gr and improve the quality of published datasets.

The commitment is considered verifiable and relevant to the Access to Information OGP value because, if implemented fully, it will lead the government to disclose more information (milestones 1, 3 and 5) and improve the quality of the information disclosed to the public (milestone 4).¹ However, the commitment does not contain all required details regarding the datasets to be made open nor any criteria for selecting datasets to be published.

The Ministry of Environment and Energy (MEE) has more than 250 datasets published across various websites, including its own Maps Portal² and Geoportal,³ along with data.gov.gr⁴ and geodata.gov.gr⁵ which published data from multiple public institutions, including land use maps. Geospatial dataset views on MEE's Maps Portal amount to 1,000+ for the most popular datasets, whereas MEE's Geoportal does not provide usage statistics. MEE explained in interviews that datasets that existed already upon release of the action plan include spatial data, custom queries from diavgeia.gov.gr and technical reports.

MEE explained that currently no APIs exist for harvesting the agency's data (milestone 2), but MEE controls two geoportals (geoportal.ypen.gr and mapsportal.ypen.gr) that provide web services according to Open Geospatial Consortium (OGC)⁶ standards. MEE stated that it was not planning to integrate information stored on an urban planning platform (E-Poleodomia⁷) as part of the changes foreseen in the commitment. MEE also stated that many published datasets were not machine readable for further processing and reuse.

Concerning the rationale behind choosing datasets to open, MEE mentioned no specific rationale other than the absence of access restrictions and stated that no relevant stakeholders outside the public sector are involved in this process.

The commitment is expected to have no potential impact. It is not sufficiently clear which datasets will be opened, what the criteria will be for choosing them and, therefore, how relevant these datasets will be.

Improvements to implementation of this commitment could bring in CSOs and other non-governmental stakeholders into the process of selecting datasets to open. Non-government stakeholder interviews revealed that foundational geospatial data such as base maps and ortho-imagery (aerial/satellite photos) would be a basic but high-value dataset that these stakeholders would like to see published.⁸ This may help address the issue of illegal constructions, antiquities protection, land and seascape restoration, which are topics that concern the ministry's responsibilities and have appeared in media during the last 12 months.⁹

¹The commitment meets some basic requirements for this value as(a) it provides open access to information (milestone 5). Still, it is not clear whether and how the commitment meets some further basic requirements for the Access to Information value, namely (b) pertain to government-held information; (c) not be restricted to data but pertain to all information; (d) promote transparency of government decision making and carrying out of basic functions; and (e) strive to meet the 5-Star model for Open Data design.

² Official website: <http://mapsportal.ypen.gr/>. See webpages <http://mapsportal.ypen.gr/maps/?limit=20&offset=0> and <http://mapsportal.ypen.gr/layers/?limit=20&offset=0>

³ Official website: <http://geoportal.ypen.gr/>. See webpage <http://geoportal.ypen.gr/geonetwork/srv/eng/catalog.search#/search?facet.q=type%2Fdataset>.

⁴ Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/ypeka?q=&sort=metadata_modified+asc.

⁵ Data sets searched through webpage <http://geodata.gov.gr/organization> and query http://geodata.gov.gr/organization/ypapen?q=&sort=metadata_modified+asc.

⁶ URL: <https://www.ogc.org/>.

⁷ Accessible at <http://gis.epoleodomia.gov.gr/v1/#!/>.

⁸ Contributed by S.Athanassiou, an academic expert experienced in geospatial data.

⁹ Concerning Commitment 10 - Open access to data of the Ministry of Environment and Energy, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/RaCDwel>; <https://cutt.ly/FaCF2uB>; <https://cutt.ly/QaCF6x2>; <https://cutt.ly/jaCGuCO>; and <https://cutt.ly/laCGgqc>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): climate adaptation (policies, projects, subsidies, calls) (2/40); construction regulations and antiquities protection (policies, decisions) (6/40); everyday environment and energy issues (policies, decisions) (3/40); illegal constructions demolition (policies, decisions, appeals) (7/40); large construction project permits (policies,decisions) (3/40); natural landscape and seascape restoration (policies, projects, decisions) (4/40); personnel recruitment (calls, terms, deadlines, decisions, appeals) (5/40); renewable energy (policies, projects, decisions) (4/40); support to wildfire victims (policies, decisions) (3/40); and urban restoration (policies, projects, decisions) (3/40). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead ministry.

11. Open access to data of the Ministry of Culture and Sports

Main Objective

The published NAP mentions (p.35) the main objective for this commitment as follows:

"Description of Commitment: A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Culture and Sports and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."

"Objectives: 1. Open data release decisions

2. Updating of the datasets

3. Adaptation of datasets in accordance with the new structure of the Ministry's services

4. Grouping and homogenisation of the datasets of the Ministry."

Milestones

The published NAP mentions (p.35-36) the milestones for this commitment as follows:

"1. Open data release decisions

2. Updating of the datasets

3. Adaptation of datasets in accordance with the new structure of the Ministry's services

4. Grouping and homogenisation of the datasets of the Ministry."

Editorial Note: For the complete text of this commitment, please see Greece's action plan at https://www.opengovpartnership.org/wp-content/uploads/2019/05/Greece_Action-Plan_2019-2021_EN.pdf, p.35-36.

IRM Design Report Assessment	
Verifiable:	Yes
Relevant:	Yes Access to Information
Potential impact:	None

Commitment analysis

This commitment aims to restructure the way data are published by the Ministry of Culture and Sport (MCS) and ensure datasets are updated. It is relevant to the Access to Information OGP value because it commits to making open data release decisions that will lead to data being published.

Data.gov.gr contains more than 40 open datasets published by MCS as of May 2019, including lists of archaeological sites, educational facilities and archives of events and exhibitions.¹ These have many different formats and contain document collections,² along with some structured data, in non-machine-readable formats,³ on fragmented topics and grouped in no particular order. The official MCS⁴ website does not contain published reports on the lead agency's open

data policy and practice. However, a number of published open data release decisions do exist (5 decisions) as of May 2019 in compliance with Law 4305/2014.⁵

No potential impact stemming from the implementation of this commitment. The Ministry did not mention any learning from implementation of the previous action plan in the design of this commitment, or integrating into this commitment feedback from the action plan co-design process. MCS explained that the grouping and homogenization process of datasets is critical because the units use different formats and data storage methods which leads to duplication of information. The Ministry explained that internal unit collaboration on this matter in an ad hoc manner will lead to homogenization of the information held within the Ministry. This cannot be considered to have sufficiently clear public facing impact. MCS did not clarify the rationale for selecting data sets to open, neither mentioned involvement of relevant stakeholders involved in the choice of the datasets. Civil society stakeholders stated that the lack of clarity of dataset release provisions means implementation of the commitment is far from the needs of stakeholders.⁶

Any changes to planned implementation could consider more structured internal collaboration to ensure a more complete and coherent overhaul of information storage and structure in the ministry rather than using an ad hoc approach. The grouping of datasets could be done in collaboration with dataset users to ensure that the logic for grouping is relevant to users and to the public sector. Greater collaboration with users and citizens could help in identifying datasets to publish. Desktop research⁷ revealed a number of topical issues for this ministry's domain of responsibility for which publishing open data would have value and could help to improve policies and processes. An indicative example is information on protection of antiquities against catastrophes and theft (such as policies or data about incidents of theft) or information around the privatisation process of management of cultural monuments.

¹ Data sets searched through webpage <http://data.gov.gr/organization> and query http://data.gov.gr/organization/yppoa?q=&sort=metadata_modified+asc.

² For example, cf. <http://data.gov.gr/dataset/arxeio-egkritikwn-shmeiwmatwn-pago>.

³ For example, cf. <http://data.gov.gr/dataset/sxoles-proponhtwn>.

⁴ <https://www.culture.gov.gr>, as mentioned in the official catalogue of the Hellenic Parliament, at <https://www.hellenicparliament.gr/en/news/links/ministries>.

⁵ Available at <https://www.culture.gov.gr/el/service/SitePages/view.aspx?ilD=2714>.

⁶ As reported by S.Loucopoulos, a CSO actor (Vouliwatch).

⁷ Concerning Commitment 11 - Open access to data of the Ministry of Culture and Sports, news headlines concerning the lead Ministry have been desk-searched for the 12-month period prior to action plan release, namely the period from May 2018 up to April 2019. Headline search has been run on a number of Greek investigative journalism news outlets (Protagon.gr, The Press Project, Documento, TVXS) and on the Google News service, using the following queries, respectively: <https://cutt.ly/KaCHEOE>; <https://cutt.ly/laCHFkq>; <https://cutt.ly/5aCHCeX>; <https://cutt.ly/PaCH8Nh>; and <https://cutt.ly/qaCJrCO>. The headlines harvested have been thematically encoded and clustered for topical issues concerning the lead Ministry's domain of responsibility, and the following list of identified topical issues has been produced (numbers in parentheses refer to partial with respect to total harvested results): financial corruption incidents (3/44); intellectual property rights protection (policies, information) (5/44); museums and monuments protection against vandalisms (incidents, policies) (4/44); museums and monuments restoration (projects, outcomes, policies) (5/44); non-competitive selection processes (direct contract awards, non-permanent staff) (1/44); personnel recruitment (calls, terms, deadlines, decisions) (3/44); privatization of cultural monuments management (cases, policies) (7/44); protection of antiquities against catastrophes and theft (policies, incidents) (4/44); protection of antiquities with respect to construction projects (policies, decisions) (3/44); public entrance to cultural sites (policies, ticket services, prices, discounts) (3/44); responses to personnel mobilizations and demands (2/44); and subsidies to the cultural sector (policies, calls, decisions, appeals) (4/44). These issues are not listed in any specific order, but they all correspond to topics which (a) fall under the lead Ministry's domain of responsibility; (b) meet the public's interest; and (c) are often the subject of ad hoc, opaque or problematic treatment, as testified by the news harvested. In this respect, releasing open data on these topics would be useful for the public, and could bring forward a positive impact in improving the relevant processes and policies of the lead ministry.

V. General Recommendations

This section aims to inform the development of the next action plan and guide implementation of the current action plan. It is divided into two sections: 1) IRM key recommendations to improve OGP process and action plans in the country and, 2) an assessment of how the government responded to previous IRM key recommendations.

5.1 IRM Five Key Recommendations

Recommendations for the next action plan's development process	
1	Adhere to the OGP's Participation and Co-creation standards when co-creating action plans.
2	Establish a permanent and fully functional multistakeholder forum that ensures and oversees the co-creation process as well as provide effective monitoring during implementation.

Adhere to the OGPs' Participation and Co-creation standards when co-creating action plans.

This recommendation stems from the specific findings of the development process for the fourth action plan. Non-governmental stakeholders explicitly expressed their concerns over lack of awareness for the design process of the fourth plan and the public consultation exercise, lack of a time window adequately sized to provide their inputs and lack of specific feedback for the inputs provided.¹

To ensure the next co-creation process complies with OGP standards, the government needs to consider extending the period of the public consultation process to ensure citizens and interested parties are able to participate in a meaningful way and provide contributions both before a first draft of the action plan has been conceived and after an initial draft has been disseminated. To ensure wider engagement of civil society and general public, the government needs to consider measures that ensure maximum awareness of civil society and the wider public of the action plan process, including access to information about the process in advance. This could be made publicly available in a single repository. Contributors would benefit from receiving timely and reasoned feedback that addresses the contribution they have made rather than a general comment that it will be looked at.

Establish a permanent and fully functional multistakeholder forum that ensures and oversees the co-creation process as well as provide effective monitoring during implementation.

This recommendation additionally draws upon a previous IRM Report Key Recommendation from assessment of the third action plan, which the IRM has not found to have informed the design process of the fourth plan (more details provided below). The lack of a multistakeholder forum to inform and oversee the co-creation process has limited the level of collaboration in the process and ambition in the action plan. Following OGP Participation and Co-creation standards, a multistakeholder forum

made up of members from civil society and government could oversee the process, consider commitments and ensure transparency and reasoned responses to contributions. The forum membership needs to be chosen through an open and transparent selection process. The multistakeholder forum could also play a monitoring role in the implementation of the action plan once the development stage is completed and the action plan is adopted. This could help ensure an ongoing dialogue on the implementation of the plan and allow timely identification, discussion and addressing of challenges in a collaborative manner.

Recommendations for the next action plan's design	
1	Develop a national open public data strategy in a collaborative manner with non-governmental stakeholders that consolidates scattered data, ensures compliance with open data standards and quality, and prioritises publishing high-value datasets to address key economic, social, and political problems in Greece.
2	In a participatory manner, develop a commitment that enhances effective whistleblower protection in both the public and private sectors.
3	Enhance public procurement transparency, in particular by prioritising publishing information on procurements made through Ministerial or joint Ministerial Decisions, or other procurements related to the Covid-19 pandemic.

Develop a national open public data strategy in a collaborative manner with non-governmental stakeholders that consolidates scattered data, ensures compliance with open data standards and quality, and prioritises publishing high-value datasets to address key economic, social, and political problems in Greece.

Currently, structured open public data are published under at least two different public sector-wide portals,² and at least two more thematic portals,³ whereas unstructured open public data are published under at least three different public sector-wide portals,⁴ resulting in scattering of resources and possible duplications of effort as well as poor findability on the side of citizens and businesses. Feedback collected from non-governmental stakeholders, in particular from academic experts,⁵ explicitly referred to poor aggregation of data by public administration and to limited compliance to established open data usability guidelines.⁶ Key recommendations in the previous IRM Report along with the EU directive on open data and reuse of public sector information⁷ point to ensuring that open data publication puts a priority on high-value datasets to address key economic, social and political problems in Greece. Public institutions to act on this recommendation include the Ministry of Digital Governance along with the Ministry of Environment and Energy, which has specific expertise on geospatial data.

In a participatory manner, develop a commitment that enhances whistleblower protection in Greece in both the public and private sectors.

Whistleblower protection has been recently institutionalised at the EU level through the Whistleblower Protection Directive.⁸ Transparency International and its national chapter TI Greece have already put out a strong call for incorporating this directive into national legislation.⁹

Although questionable COVID-19 public spending cases have appeared worldwide,¹⁰ there is an ongoing discussion for the need for COVID-19-related spending transparency in Greece too.¹¹ Clear action on the protection of whistleblowers in general, and in particular on fiscal matters, has the potential to address these concerns and to help make the next action plan stronger in the focus on public accountability.

Such a commitment could focus on ensuring greater protection for whistleblowers against retaliation and ensure that Greek authorities raise awareness and inform citizens on whistleblowing. Furthermore, a commitment could be made with civil society to implement a training program for public officials on how to deal appropriately with whistleblowing.

Public institutions that could act on this recommendation include the Ministry of Health, the Ministry of Justice, the Ministry of Finance, the Ministry of Development and Investments, along with the Hellenic Parliament and the recently established National Transparency Authority (NTA), who dispose of the mandates and legal instruments required to handle cases of alleged corruption involving civil servants, MPs and members of the Cabinet.

Enhance public procurement transparency, in particular by prioritising publication of information on procurements made through Ministerial or joint Ministerial Decisions, or other procurements related to the COVID-19 pandemic.

The government made a number of spending decisions in the format of Ministerial or Joint Ministerial Decisions related to responding to the COVID-19 crisis which circumvent ratification by Parliament. This evades effective scrutiny and oversight of such spending. Examples include the €20m COVID-19 public awareness campaign that has been directly awarded to a private company without disclosing financial details of the programme and the allocation of a €190m financial package to a number of private companies to implement an e-learning programme for the self-employed. The Ministry of Labour launched an investigation.¹²

As the country is moving from immediate emergency response to long-term recovery and reform, it is essential that measures are taken to strengthen transparency and accountability in public procurement processes. Civil society actors have called for more transparency, participation and accountability in the management of COVID-19 pandemic-related expenditures¹³. At the same time, international organisations¹⁴ have expressed concerns over the transparency, accountability and participation levels needed to safeguard public trust in governments' decisions.

The OGP's Open Response Open Recovery campaign¹⁵ contains shared resources to address procurement and COVID-19, which could be considered in the next co-creation process to help develop a specific commitment in the next action plan on procurement transparency in collaboration with civil society.

Develop local civic participation mechanisms, with a special focus to include youth voices in local policymaking processes.

Greece's previous action plan included commitments from the Region of Western Macedonia¹⁶ and the Municipality of Thessaloniki¹⁷ to publish budget and spending information. The region of Central Greece¹⁸ committed to implementing participatory budgeting. Although these commitments had limited early results, they are steppingstones to bringing greater transparency and civic participation to Greece.

Non-governmental stakeholders stated in interviews that to address the full spectrum of open government, more commitments are needed for increasing interactions between the public and administrations; for civic participation and e-participation, with emphasis on participation in decision-making; and for deliberative democracy designs.¹⁹

A new commitment in the next action plan for Greece could therefore seek to develop opportunities to engage Greek citizens in policy and decision-making through participatory processes. As this has already been attempted at the local level in previous action plans, the next action plan could seek to engage these same, or other, local areas to improve current processes or to innovate and implement participative mechanisms using deliberative processes on specific service delivery or policy processes.

Central government – such as the Ministry of the Interior, the National Centre for Public Administration and Local Government, and the Ministry of Digital Governance – could help facilitate learning and resources to establish local participatory and deliberative processes. Civil society groups both at the national and at the local level could be involved in co-creating local participatory processes.

This recommendation also builds upon the suggestions of the previous IRM Report which recommended looking at introducing tools and processes that would enable public accountability and oversight and would increase opportunities for public engagement in fiscal policy.

Such participative processes could ensure youth participation. Greece's ratification of the UN Convention on the Rights of the Child (CRC)²⁰ and the agendas of child participation²¹ and children citizenship, as voiced by international organisations such as the UN Office of the High Commissioner on Human Rights and the Council of Europe,²² highlight the importance of participation of youth. In this respect, the next plan could commit to deploy local participation instruments with the focus on empowering youth. Public institutions that could act on this recommendation include the Ministry of Education and Religious Affairs along with ministries and public bodies that have a mandate to handle youth affairs.

5.2 Response to Previous IRM Key Recommendations

Previous IRM Report Key Recommendations

Recommendation		Did it inform the OGP Process?
1	Focus on continuity and consistency by creating a mandate for OGP action plan development and implementation that assigns specific responsibilities to the national representative, the national point of contact, and public officials involved.	✓
2	Establish a permanent and fully functional multistakeholder forum to monitor and improve the implementation of the action plan.	X
3	Think of the impact for citizens first. New commitments must balance achievable ambition with a focus on improving citizens' lives.	X
4	Develop problem-oriented commitments that seek to address key economic, social, and political problems in Greece.	X
5	Regain trust in public institutions. Continue work in fiscal openness with a focus on citizen engagement, auditing, and public accountability.	X

Recommendation 1 has informed the OGP process for Greece in the context of the fourth action plan design process in a partial way. With respect to consistency, public agencies have been allocated to specific commitments, ensuring a clearer responsibility than in the previous action plan. However, with reference to continuity, the IRM has found that a challenge of feedback collection on commitments from the lead agencies has been a difficulty stemming from cases of contact persons not having complete knowledge to address the corresponding commitments, as testified to by a large number of internal referrals to peers and subordinates that has more than doubled in size of the contact persons list.²³ This phenomenon, which in the understanding of the IRM relates to the re-allocation of responsibilities following a government change, although not concerning the fourth action plan design process per se but the broader ongoing OGP process of Greece, is nevertheless something to be noted as a continuity drawback. On the other side, it must also be noted that currently (following the 2019 government change) the government has established for the first time in Greece a Ministry of Digital Governance, with a Digital Strategy portfolio allocated at the deputy minister level (Mr Grigoris Zarifopoulos) and a Digital Governance and Procedures Simplification portfolio allocated at the secretary general level (Mr Leonidas Christopoulos).²⁴ At the same time, the Minister of State Mr Kyriakos Pierrakakis, who heads the Ministry of Digital Governance, recently set up a Coordinating Committee for Digital Transformation²⁵ whose membership comprises approximately 60 representatives from all ministries and from a number of supervised public bodies, along with the OGP National Point of Contact for Greece Ms Nancy Routzouni as central coordinator for Digital Actions. Additionally, in Law 4623/2019,²⁶ the government has institutionalised the creation of a White Paper of Digital Transformation to be made available for public consultation. The official mandate of the Ministry of Digital Governance²⁷ and the first information on the contents of the

White Paper on Digital Transformation that were uncovered in the press²⁸ do not contain explicit references to the open government agenda. However, the recent law on Digital Governance and Electronic Communications²⁹ contains two chapters on open public data for reuse and digital transparency. These decisions establish continuity and consistency to Greece's broader digital government process and, in parallel, lend themselves as instruments for providing a similar level of continuity and consistency to the country's OGP process too. This is evidenced by the fact that the OGP National Point of Contact for Greece participates, and so much so with a core role, in the Coordinating Committee for Digital Transformation, and the original list of contact persons to consult on the fourth action plan commitments came from membership of this committee. In this respect, as far as the broader OGP process of Greece is concerned, Recommendation 1 can be considered to have informed this process.

Recommendation 2 has not been found to have informed the OGP process for Greece in the context of the fourth action plan design process. No information has been found documenting the establishment by the government of a multistakeholder forum to be used for this process or for monitoring and improving implementation of the action plan. Still, in the context of a Kick-Off Meeting for the OpenGov Monitor initiative,³⁰ co-organised by GFOSS and TI Greece in Athens (4 December 2019) and attended by a number of civil society and public sector stakeholders, including Mr Grigoris Zarifopoulos, deputy minister of Digital Governance, and in a follow-up Workshop on Co-Design of the OpenGov Monitor Platform,³¹ co-organised by GFOSS and TI Greece in Athens (28 January 2020) and attended by a number of civil society and public sector stakeholders, the need for such a forum was recognised and taken up by civil society.

Recommendations 3 and 4 have not been found to have informed the OGP process for Greece in the context of the fourth action plan design process. In fact, objectives on improving citizens' lives and addressing key problems in Greece are not described in the action plan, and the IRM does not find that they have been implicitly considered in the design of commitments either. This is based both on the feedback received from lead agency contact persons, which contain only a few cases in which design rationale mentions the need to open up high-value datasets, and on the feedback received from stakeholders and experts, who criticise the absence of clear links to improving citizens' lives and addressing key problems. For more detailed information on this, see IV. Commitments.

Recommendation 5 has not been found by the IRM to have informed the OGP process for Greece in the context of the fourth action plan design process. The commitment coming more close to this recommendation (Commitment 7: Open access to data of the Ministry of Economy and Development) states, *"A wealth of data falling within the scope of Law 4305/2014 is available to the Ministry of Economy and Development and its supervised entities and will be made available for re-use in order to contribute to the development and participation of citizens."* Still, the ways in which availability of data will practically focus on citizen engagement, auditing and public accountability are not made clear in this commitment description nor in the feedback collected from the contact persons of the lead public sector agency.³² All 11 commitments of the fourth action plan on opening public data have the potential to contribute, if completed as

written, to building public trust, but this comes as a desirable lateral effect rather than as an expressed design goal which can be clearly traced in the action plan.

¹ For more details on this, see Section III. Leadership and Multistakeholder Process.

² The Data.gov.gr (<http://data.gov.gr/>) and Geodata.gov.gr (<http://geodata.gov.gr/>) portals.

³ The <http://geoportal.ypen.gr/> and <http://mapsportal.ypen.gr/> portals of the Ministry of Environment and Energy, also mentioned in the feedback collected by contact persons of this Ministry (Konstantinos Stefanakis, Panagiotis Katsaridis, CharikliaAndrikopoulou) with respect to Commitment 10 of the fourth action plan, on 15 April 2020, through email communication. For more details see IV. Commitments and VI. Methodology and Sources.

⁴ The OpenGov.gr portal (<http://www.opengov.gr/home/>) for public consultations on law drafts, the Hellenic Parliament website (<https://www.hellenicparliament.gr/Nomothetiko-Ergo/Katatethenta-Nomosxedia>) for laws and legislative content acts under parliamentary ratification, the Official Government Gazette portal (<http://www.et.gr/>) for ratified legislation, and the Diavgeia portal (<https://diavgeia.gov.gr/>) for public body decisions.

⁵ For more details on this, see Section IV. Commitments.

⁶ Including, for instance, the 5 Star Linked Data scheme (https://www.w3.org/2011/gld/wiki/5_Star_Linked_Data), FAIR principles (<https://www.go-fair.org/fair-principles/>), the Open Geospatial Consortium standards (<https://www.ogc.org/standards/>) and other similar established guidelines.

⁷ Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information, PE/28/2019/REV/1, OJ L 172, 26.6.2019, p. 56–83, online available at <https://eur-lex.europa.eu/eli/dir/2019/1024/oj>.

⁸ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, PE/78/2019/REV/1, OJ L 305, 26.11.2019, p. 17–56, online available at <https://eur-lex.europa.eu/eli/dir/2019/1937/oj>.

⁹ Cf. Transparency International (2019). BUILDING ON THE EU DIRECTIVE FOR WHISTLEBLOWER PROTECTION ANALYSIS AND RECOMMENDATIONS. Position Paper #1/2019, online available at http://www.transparency.gr/wp-content/uploads/2019/12/2019_EU_whistleblowing_EN.pdf; and a much earlier report, TI Greece (2013). Providing an Alternative to Silence: Towards Greater Protection and Support for Whistleblowers in the EU. Country Report Greece. April 2013, online available at http://www.transparency.gr/wp-content/uploads/2013/11/WHISTLEBLOWERS_ENGLISH_LOW.pdf.

¹⁰ Cf. an email bulletin by Transparency International, May 22, 2020, online available at <https://transparencyinternational.cmail19.com/t/ViewEmail/r/2A403AD32489E63E2540EF23F0FEDED/F7A148C35F6CD44216B21F2806CB3AEB>. Also cf. a recent study by Transparency International in response to a query from a U4 Partner Agency, 'Professional enablers of economic crime during crises', published on May 25, 2020, available at <https://knowledgehub.transparency.org/helpdesk/professional-enablers-of-economic-crime-during-crises>.

¹¹ As a recent example, see 'As the pandemic subsidies, Greeks will soon want answers on public finances', opinion piece by A.Fotiadis on the online edition of Guardian, June 16, 2020, available at <https://www.theguardian.com/commentisfree/2020/jun/16/pandemic-greece-public-finances-covid-19>.

¹² Fotiadis A (2020) *As the pandemic subsidies, Greeks will soon want answers on public finances*, The Guardian, available at <https://www.theguardian.com/commentisfree/2020/jun/16/pandemic-greece-public-finances-covid-19>

¹³ Transparency International Greece & GFOSS, March 31, 2020, Letter to the Minister of State Mr. Giorgos Gerapetriti and to the Deputy Minister to the Prime Minister for Government Coordination Mr. Aris Skertsos, available at <https://opengov.ellak.gr/2020/03/31/apetite-diafania-simmetochi-ke-logodosia-sti-diachirisi-tis-pandimias-tou-covid-19/>.

¹⁴ Cf. IMF (2020). Keeping the Receipts: Transparency, Accountability, and Legitimacy in Emergency Responses. IMF Fiscal Affairs, Special Series on Fiscal Policies to Respond to COVID-19, prepared by Claude Wendling et al. April 20, 2020, online available at <https://www.imf.org/en/Publications/SPROLLS/covid19-special-notes>.

¹⁵ <https://www.opengovpartnership.org/campaigns/open-response-open-recovery/>

¹⁶ Budget information available at <https://www.pdm.gov.gr/opengov/open-budget/>, last update December 2018.

¹⁷ Budget information available at <https://thessaloniki.gr/%CE%B8%CE%AD%CE%BB%CF%89-%CE%B1%CF%80%CF%8C-%CF%84%CE%BF%CE%BD-%CE%B4%CE%AE%CE%BC%CE%BF%CE%B8%CE%AD%CE%BB%CF%89-%CE%BD%CE%B1-%CE%B5%CE%BD%CE%B7%CE%BC%CE%B5%CF%81%CF%89%CE%B8%CF%8E%CE%B4%CE%B9%CE%B1%CF%86%CE%AC%CE%BD%CE%B5%CE%B9%CE%B1-%CE%BB%CE%BF%CE%B3%CE%BF%CE%B4%CE%BF%CF%83%CE%AF%CE%B1%CF%80%CF%81%CE%BF%CF%85%CF%80%CE%BF%CE%BB%CE%BF%CE%B3%CE%B9%CF%83%CE%BC%CF%8C%CF%82/>, last update January 2020.

¹⁸ Budget information available at <https://pbplatform.crowdapps.net/sterea/>, last update February 2019.

¹⁹ Combining criticisms made by S. Athanassiou, S. Vitoratos, S. Gritzalis, A. Deligkaiouri, M. Karatza and S. Loucopoulos.

²⁰ Signature date January 26, 1990, ratification date May 11, 1993, information drawn from the United Nations Treaty Collection, webpage https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11&chapter=4&lang=en.

²¹ Cf. the child participation thematic pages of UN OHCHR at <https://www.ohchr.org/EN/HRBodies/CRC/Pages/ChildParticipation.aspx>, and of the Council of Europe at <https://www.coe.int/en/web/children/participation>, as well as the Council of Europe Recommendation on

participation of children and young people under the age of 18, available at https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805cb0ca.

²² Cf. the Council of Europe Reference Framework of Competences for Democratic Culture (RFCDC), webpage <https://www.coe.int/en/web/reference-framework-of-competences-for-democratic-culture/home>, and CoE's intergovernmental project on Digital Citizenship Education (DCE), webpage <https://www.coe.int/en/web/digital-citizenship-education/home>.

²³ For more details on this, see VI. Methodology and Sources.

²⁴ More details available on the Ministry of Digital Governance website, <https://mindigital.gr/dioikisi>.

²⁵ Decision of the Minister of State Mr. Kyriakos Pierrakakis, 26 February 2020, published on the Diavgeia government portal, online available at

<https://diavgeia.gov.gr/decision/view/6%CE%A3%CE%9F946%CE%9C%CE%A4%CE%9B%CE%A0-%CE%A4%CE%A52>.

²⁶ Law 4623/2019, Article 49 "White Paper on Digital Transformation", Official Government Gazette No.134A, August 9, 2019, online available at http://www.et.gr/idosc-nph/search/pdfViewerForm.html?args=5C7OrtC22wFqnM3eAbJzrXdtvSoClrL8SzKdMKJot955MXD0LzOTLWPU9yLzB8V68knBzLCmTXKaO6fpYZ6Lx3UnKI3nP8Nxdnj5r9cmVWyJWelDvWS_18kAEhATUkj0x1LldQ163nV9K--td6SluVqsEss2eSalS82-Bx6Fvy3NAmZrlb4nmIH1p7XjCQdg.

²⁷ Online available on the Ministry website, <https://mindigital.gr/to-ypourgeio/apostoli>.

²⁸ Cf. a news article by BusinessDaily.gr, March 3, 2020, 'White Paper on Digital Transformation: The 18 movements that will change everything', online available at https://www.businessdaily.gr/oikonomia/12060_biblos-psifiakoy-metashimatismoy-oi-18-kiniseis-poy-allazoyn-ta-panta (in Greek).

²⁹ Law 4727/2020, Official Government Gazette no.A184/23.09.2020, available at http://www.et.gr/idosc-nph/search/pdfViewerForm.html?args=5C7OrtC22wHUdWr4xouZundtvSoClrL8yb7I1HobT0h5MXD0LzOTLWPU9yLzB8V68knBzLCmTXKaO6fpYZ6Lx3UnKI3nP8Nxdnj5r9cmVWyJWelDvWS_18kAEhATUkj0x1LldQ163nV9K--td6SluamaZppfIYGufqs-72Wsf7c7-sBp-O-XlfrI56OkYmC.

³⁰ Invitation to the IRM researcher to attend this meeting was sent by TI Greece. The meeting attendance form is online available at https://docs.google.com/forms/d/e/1FAIpQLScCghPQHvHjJoO4tmZCqqmVlgWFiS5uPLnQ-6c_7g3rrEc0g/viewform. The meeting minutes and presentations were made online available to participants (weblink available upon request to the organizers for permission).

³¹ Invitation to the IRM researcher to attend this workshop was sent by TI Greece. The workshop attendance form is online available at <https://ellak.gr/opengovmonitor/>. The meeting minutes were made online available to participants (weblink available upon request to the organizers for permission).

³² A set of open-ended questions on this commitment (see VI. Methodology and Sources) has been addressed to contact persons from the Ministry of Development and Investments (Konstantina Deligiorgi) and the Ministry of Finance (Christos Christodoulou), and responded to by K. Deligiorgi on 4 May 2020, through email communication.

VI. Methodology and Sources

IRM reports are written in collaboration with researchers for each OGP-participating country. All IRM reports undergo a process of quality control 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, observation, and feedback from nongovernmental stakeholders. The IRM report builds on the evidence available in Greece's OGP webpage¹ and Government website on Open Government², which are used in the absence of an OGP repository or online tracker, findings in the government's own self-assessment reports, and any other assessments of process and progress put out by civil society, the private sector, or international organisations.

Each IRM researcher conducts stakeholder interviews to ensure an accurate portrayal of events. Given budgetary and calendar constraints, the IRM cannot consult all interested parties or visit implementation sites. Some contexts require anonymity of interviewees and the IRM reserves the right to remove personal identifying information of these participants. Due to the necessary limitations of the method, the IRM strongly encourages commentary during the pre-publication review period of each report.

Each report undergoes a quality-control process that includes an internal review by IRM staff and the IRM's International Experts Panel (IEP). Each report also undergoes an external review where governments and civil society are invited to provide comments on the content of the draft IRM report.

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual.³

Fact-finding methods and sources

The fact-finding exercise for each commitment has been designed in a twofold way, based on interviews and desk research. Lists of questions have been drafted and sent out by email to interviewees in English, allowing for responses in English or Greek, and running the interview process altogether as elaborated further below. Given the focus of commitments on open data, desk research has been performed on the official public sector-wide Greek Government portals for structured open data, namely data.gov.gr and geodata.gov.gr, on any thematic portals for structured open data mentioned by the commitment lead agency, as well as on the lead agency's official website. Structured open data portals have been researched for open datasets published as of the publication of the fourth action plan (May 2019), in order to help assess the baseline situation, whereas lead agency official websites have been researched for reports on open data policy and practice, published either before or after publication of the fourth action plan.

Interviews and stakeholder input

The IRM researcher was provided by the National Point of Contact with an original list of 15 contact persons from the Greek public sector lead agencies of the 11 commitments. This list was subsequently enriched, through internal referrals by the lead agencies, to a total of 34 contact persons. The details of these contact persons and their response timeline are available in an online document.⁴ From these contact persons it has been possible, by the time of closing the feedback collection process of the draft Design Report (22 May 2020) for submission to the IRM (25 May 2020), to collect feedback for 10 out of the 11 commitments from 13 April 2020 up to

11 June 2020. With regard to the one commitment (commitment 3) for which it has not been possible to collect feedback by the lead agency, the IRM researcher made every reasonable effort to facilitate the feedback collection process by means of allowing a time frame of 80 calendar days and making more than five communications with reminders and/or clarifications. For this commitment, assessment has been based on further sources, namely on desk research and feedback from third-party stakeholders and experts.

Additionally, the IRM researcher identified a set of 65 third stakeholders and experts coming from civil society, academia and, in some cases, the public sector. The details of these contact persons and their response timeline are available in an online document.⁵ These persons have been selected based on their involvement in specific domains of the commitments and open government in general, as well as (for academic persons) on their expertise on open government, open data, electronic government, and/or public administration, and have provided a total of 26 responses from April 7, 2020 up to May 29, 2020. Given that during the feedback collection process Greece was affected by the COVID-19 outbreak, with requirements for remote work and restrictions on mobility and professional gatherings,⁶ the IRM researcher decided to replace in-person interviews with questionnaires mostly based on open-ended questions. Email questionnaires were sent out to all respondents, and the latter were also offered the option of phone and video calls for clarifications and feedback provision. In all cases, respondents opted to provide their final feedback by email. The option of phone calls for clarifications was taken up by some respondents, whereas no respondents took up the option of video calls.

The detailed feedback-collection questions sent out to contact persons from the lead agencies for the 11 commitments are available in a document online.⁷ These questions were designed for resolving unclear points that the commitments presented as they currently read with respect to their rationale, verifiability and impact if completed. For each commitment, a similar set of questions was also sent out to selected civil society stakeholders. In parallel, an additional set of questions was designed for third stakeholders and experts, on (a) their eventual involvement in the co-creation process of action plan, and (b) the eventual response of action plan to their own priorities and expectations for positive impact on the open government agenda for Greece. These detailed questions are also available in a document online.⁸

Challenges identified during interviews

Detailed information about commitment leadership contingency and performance/effectiveness of the interviews-based feedback collection process is provided in an online document.⁹ As this information elaborates, the IRM researcher observed a number of difficulties respondents faced. (1) Due to the COVID-19 outbreak, many public sector mid-management personnel were working remotely; therefore, they were hard to reach by office phone for clarifications and follow-up. (2) As the COVID-19 outbreak entailed the need for emergency responses by the public administration at multiple levels, coupled with public servants taking special parental leaves for family care needs, daily workload of public administration has been more demanding than usual. This is especially true for MDG staff concerned with deploying many new e-services. (3) Response to IRM researcher questions created the need for collaboration between different workgroups and departments within the lead agencies, which required considerable time. (4) At least for one commitment, response to IRM researcher questions also raised responsibility concerns. (5) In some cases, which in the IRM researcher's view may be due to organisational

changes following the change of government in 2019, contact persons seemed to not have acquired complete familiarity with the commitments and delegated the task of responding to peers or subordinates. These difficulties explain the more than doubling in size of the contact persons list through internal referrals, which resulted in cases of delayed and sub-optimal feedback and, for 1 of the 11 commitments, in no provision of feedback at all.

Feedback collection from third stakeholders and experts was less complicated. The 40% response rate achieved is considered satisfactory in terms of performance, also considering that only one reminder was sent out for pending replies. With regard to non-replies, only 7 respondents provided an 'unable to reply' notification due to lack of time (in 1 case) and lack of perceived competence (in 6 cases). Still, the responses collected are satisfactory, based not only on their number (26 responses) but also on their contents and the views expressed, which are converging and show saturation of findings. All third stakeholders and experts have been notified by the IRM researcher about the possibility of keeping specific references to their input anonymised upon their expressed request.

Desk research sources

As an additional fact-finding mechanism, on top of feedback collection from contact persons and third stakeholders/experts, the IRM researcher used the following desk research sources: (a) the data.gov.gr,¹⁰ geodata.gov.gr¹¹ and opengov.gr¹² government open data portals; (b) the recently established (March 2020) gov.gr digital service portal;¹³ (c) the portal of the National Printing House of Greece,¹⁴ providing access to the Official Government Gazette; (d) the press release service of the Greek Ministry of Digital Governance;¹⁵ (e) the press release services of GFOSS,¹⁶ TI Greece,¹⁷ and other CSOs in Greece; and a number of Greek ICT-dedicated newsletters, such as Weekly Telecom¹⁸ and ICT Plus.¹⁹ Apart from that, topical issue searches for the lead agencies of all commitments were performed through a number of Greek investigative journalism news outlets (Protagon.gr,²⁰ The Press Project,²¹ Documento,²² TVXS²³) and on the Google News service.²⁴

Events attended

Lastly, the IRM researcher attended as an observer a number of OGP-related events organised by Greek CSOs with the participation, in one case, of IRM staff. These comprise: (1) A Kick-Off Meeting for the OpenGov Monitor initiative,²⁵ co-organised by GFOSS and TI Greece in Athens (4 December 2019) and attended by a number of civil society and public sector stakeholders, including Mr Grigoris Zarifopoulos, deputy minister of Digital Strategy. This meeting was attended by lead researcher Dr Dimitris Gouscos and co-researcher Dr Evika Karamagioli. (2) A follow-up Workshop on Co-Design of the OpenGov Monitor Platform,²⁶ co-organised by GFOSS and TI Greece in Athens (28 January 2020) and attended by a number of civil society and public sector stakeholders. This workshop was attended by lead researcher Dr Dimitris Gouscos. (3) A Webinar on Developing Strong Commitments,²⁷ offered by IRM and co-hosted by TI Greece, which took place online on 7 February 2020, was delivered by IRM staff (Ms Tinatin Ninua, Ms Helen Turek and Mr Matthew Tramonti) and was attended by a number of civil society and public sector stakeholders, including Ms Nancy Routzouni, OGP National Point of Contact for Greece. This webinar was attended by lead researcher Dr Dimitris Gouscos.

About the Independent Reporting Mechanism

The Independent Reporting Mechanism (IRM) is a key means by which all stakeholders can track OGP progress in participating countries and entities. The International Experts Panel (IEP) oversees the quality control of each report. The IEP is comprised of experts in transparency, participation, accountability, and social science research methods.

Current membership of the International Experts Panel is

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Juanita Olaya

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

¹ URL: <https://www.opengovpartnership.org/members/greece/>.

² URL: <http://www.opengov.gr/home/>.

³ IRM Procedures Manual, V.3: <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

⁴ See the Fourth Greece Action Plan Design Report online folder available at https://drive.google.com/drive/folders/198BxqR80S5aFvs8qdjo9_7i_LrDEUvPt, document “Lead agency contact persons for Greece NAP4”.

⁵ See the Fourth Greece Action Plan Design Report online folder available at https://drive.google.com/drive/folders/198BxqR80S5aFvs8qdjo9_7i_LrDEUvPt, document “Third stakeholders contacted for Greece NAP4”.

⁶ More information on this is provided in section II. Open Government Context in Greece of the report.

⁷ See the Fourth Greece Action Plan Design Report online folder available at https://drive.google.com/drive/folders/198BxqR80S5aFvs8qdjo9_7i_LrDEUvPt, document “Questions for Greece NAP4 commitments to lead agency contacts”.

⁸ See the Fourth Greece Action Plan Design Report online folder available at https://drive.google.com/drive/folders/198BxqR80S5aFvs8qdjo9_7i_LrDEUvPt, document “Questions for Greece NAP4 co-creation and contents to third stakeholders”.

⁹ See the Fourth Greece Action Plan Design Report online folder available at https://drive.google.com/drive/folders/198BxqR80S5aFvs8qdjo9_7i_LrDEUvPt, document “Greece NAP4 commitment leadership and interviewing process”.

¹⁰ URL: <http://data.gov.gr/>.

¹¹ URL: <http://geodata.gov.gr/>.

¹² URL: <http://www.opengov.gr/home/>.

¹³ URL: <https://www.gov.gr/>.

¹⁴ URL: <http://www.et.gr/>.

¹⁵ URL: <https://mindigital.gr/archives/category/deltia-typou-anakoinoseis>.

¹⁶ URL: <https://eellak.ellak.gr/deltia-tipou/>.

¹⁷ URL: <http://www.transparency.gr/nea-kai-typos/deltia-typou/>.

¹⁸ URL: <https://www.infocom.gr/weekly-telecom-archive/>.

¹⁹ URL: <http://www.ictplus.gr/>.

²⁰ URL: <https://www.protagon.gr/>.

²¹ URL: <https://thepressproject.gr/>.

²² URL: <https://www.documentonews.gr/>.

²³ URL: <https://tvxs.gr/>.

²⁴ URL: <https://news.google.com/>.

²⁵ Invitation to the IRM researcher to attend this meeting was sent by TI Greece. The meeting attendance form is online available at https://docs.google.com/forms/d/e/1FAIpQLScCghPQHvHhJoO4tmZCqqumVlgWFiS5uPLnO-6c_7g3rrEc0g/viewform. The meeting minutes and presentations were made online available to participants (weblink available upon request to the organizers for permission).

²⁶ Invitation to the IRM researcher to attend this workshop was sent by TI Greece. The workshop attendance form is online available at <https://ellak.gr/opengovmonitor/>. The meeting minutes were made online available to participants (weblink available upon request to the organizers for permission).

²⁷ Invitation to the IRM researcher to attend this webinar was sent by TI Greece. The webinar information note is online available at <https://drive.google.com/file/d/0B2uhxfYzEIdgYm9OazRleUlpQU9LMnlzODZrQXdFWE9ZVFUw/view>. The

webinar presentations and recording were made online available to participants (weblinks available upon request to the organizers for permission).

Annex I. Commitment Indicators

All OGP-participating governments develop OGP action plans that include concrete commitments over a two-year period. Governments begin their OGP action plans by sharing existing efforts related to open government, including specific strategies and ongoing programs.

Commitments should be appropriate to each country's circumstances and challenges. 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.¹ The indicators and method used in the IRM research can be found in the IRM Procedures Manual.² A summary of key indicators the IRM assesses is below:

- **Verifiability:**
 - Not specific enough to verify: Do the written objectives and proposed actions lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment?
 - Specific enough to verify: Are the written objectives and proposed actions sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment?
- **Relevance:** This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine relevance are:
 - Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
 - Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
 - Public Accountability: Will the government create or improve public-facing opportunities to hold officials answerable for their actions?
- **Potential impact:** This variable assesses the potential impact of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
 - Identify the social, economic, political, or environmental problem;
 - Establish the status quo at the outset of the action plan; and
 - Assess the degree to which the commitment, if implemented, would impact performance and tackle the problem.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the country's IRM Implementation Report.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the country's IRM Implementation Report.

What makes a results-oriented commitment?

A results-oriented commitment has more potential to be ambitious and be implemented. It clearly describes the:

1. **Problem:** What is the economic, social, political, or environmental problem rather than describing an administrative issue or tool? (E.g., “Misallocation of welfare funds” is more helpful than “lacking a website.”)
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan? (E.g., “26% of judicial corruption complaints are not processed currently.”)
3. **Change:** Rather than stating intermediary outputs, what is the targeted behavior change that is expected from the commitment’s implementation? (E.g., “Doubling response rates to information requests” is a stronger goal than “publishing a protocol for response.”)

Starred commitments

One measure, the “starred commitment” (★), deserves further explanation due to its interest to readers and usefulness for encouraging a race to the top among OGP-participating countries/entities. Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria.

- Potential star: the commitment’s design should be **verifiable**, **relevant** to OGP values, and have **transformative** potential impact.
- The government must make significant progress on this commitment during the action plan implementation period, receiving an assessment of **substantial** or **complete** implementation.

These variables are assessed at the end of the action plan cycle in the country’s IRM Implementation Report.

¹ “Open Government Partnership: Articles of Governance” (OGP, 17 Jun. 2019), <https://www.opengovpartnership.org/articles-of-governance/>.

² “IRM Procedures Manual” (OGP), <https://www.opengovpartnership.org/documents/irm-procedures-manual>.